

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION
REDIRECTED FROM WITNESS BOZZO
(MMA/USPS-T14-1(A), 6(A-C), 7(A-C), AND 8(A-C))

The United States Postal Service hereby provides the responses of
witness Miller to the following interrogatories of Major Mailers Association:
MMA/USPS-T14-1(a), 6(a-c), 7(a-c), and 8(a-c)., filed on October 5, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
November 19, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS BOZZO**

KE/USPS-T14-1 Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the outgoing BCS primary operation.

- A. Please refer to page 52 of Library Reference USPS-LR-J-60. Please confirm that, according to USPS witness Miller, 5.35% of all letters sent to the outgoing BCS primary are barcoded by the Postal Service in the RBCS, and that the remaining letters sent to that operation, 94.65%, have been prebarcoded by mailers. If you cannot confirm, please explain.

RESPONSE:

- A. Not confirmed. The page referenced in this interrogatory contains presort letters and cards density tables. This data have nothing to do with the percent of mail that is prebarcoded by Postal Service mail processing equipment or by mailers.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS BOZZO**

KE/USPS-T-14-6 Please refer to pages 12 and 14 of Library Reference
USPS-LR-J-60.

- A. Please confirm that according to USPS witness Miller, 7.61% of handwritten letters (761 of 10,000 letters) will be rejected by postal automation equipment at some point during processing and processed manually from that point on. If you cannot confirm, please explain.
- B. Please confirm that according to USPS witness Miller, 10.52% of QBRM letters (1,052 of 10,000 letters) will be rejected by postal automation equipment at some point during processing and processed manually. If you cannot confirm, please explain.
- C. Is it reasonable to expect that 7.61 % of handwritten addressed letters would be rejected by postal automation equipment, but if those same letters have prebarcodes and printed addresses that are pre-approved pursuant to USPS requirements, that 10.52% of such letters would be rejected? Please explain your answer.

RESPONSE:

- A. Not confirmed. Please see the USPS LR-J-60 revisions filed on 11/15/01.
- B. Not confirmed. Please see the USPS LR-J-60 revisions filed on 11/15/01.
- C. This issue has been resolved using the new methodology filed on 11/5/01 and subsequently updated on 11/15/01.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS BOZZO**

KE/USPS-T-14-7 Please refer to pages 14 and 16 of Library Reference
USPS-LR-J-60.

- A. Please confirm that, according to USPS witness Miller, 4.51 percent of metered letters (451 of 10,000 letters) will be rejected by postal automation equipment at some point during processing (excluding the incoming secondary operation) and processed manually. If you cannot confirm, please explain.
- B. Please confirm that, according to USPS witness Miller, 10.52 percent of QBRM letters (1,052 of 10,000 letters) will be rejected by postal automation equipment at some point during processing and processed manually. If you cannot confirm, please explain.
- C. Is it reasonable to expect that 4.49 % of metered letters would be rejected by postal automation equipment, but 10.52% of prebarcoded letters with printed addresses that were pre-approved pursuant to USPS requirements would be rejected? Please explain your answer.

RESPONSE:

- A. Not confirmed. Please see the USPS LR-J-60 revisions filed on 11/15/01.
- B. Not confirmed. Please see the USPS LR-J-60 revisions filed on 11/15/01.
- C. *This issue has been resolved using the new methodology filed on 11/5/01 and subsequently updated on 11/15/01.*

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS BOZZO**

KE/USPS-T-14-8 Please refer to pages 12 and 14 of Library Reference USPS-LR-J-60 where Mr. Miller presents his mail flow models for handwritten and QBRM letters.

- A. Please confirm that of 10,000 handwritten letters sent to the outgoing RBCS, Mr. Miller finds that 9,891 letters will be successfully barcoded and sorted and that such letters will next be sent to an automated operation for additional processing; and the remaining 109 letters will be sent to a manual operation for additional processing. If no, please explain.
- B. Please confirm that of 10,000 QBRM letters sent to the outgoing BCS primary, Mr. Miller finds that 9,510 letters will be successfully sorted and that such letters will next be sent to an automated operation for additional processing; and the remaining 490 letters will be sent to a manual operation for additional processing. If no, please explain.
- C. Is it reasonable for the RBCS to "reject" 1.09% of handwritten letters but for a barcode sorted to reject 4.9% of pre-approved, prebarcoded QBRM letters? Please explain your answer.

RESPONSE:

- A. Not confirmed. Please see the USPS LR-J-60 revisions filed on 11/15/01.
- B. Not confirmed. Please see the USPS LR-J-60 revisions filed on 11/15/01.
- C. This issue has been resolved using the new methodology filed on 11/5/01 and subsequently updated on 11/15/01.

DECLARATION

I, Michael W. Miller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

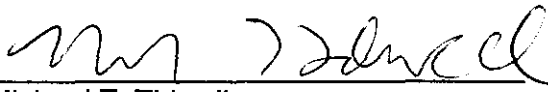


MICHAEL W. MILLER

Dated: 11/19/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Michael T. Tidwell

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