UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2001) Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY
(OCA/USPS-T39-9-12)
November 20, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T39-9. Please refer to the response to OCA/USPS-167.

a. Refer to the response to part c.i. Please describe the duties of "retail acceptance personnel."

b. Refer to the response to part c.i. Please confirm that "retail acceptance personnel" do not mark nonstandard/nonmachinable letter-shaped mail "Postage Due." If you do not confirm, please explain.

c. Refer to the response to part c.i. Please confirm that carriers retrieving mail from "collection boxes" do not mark any nonstandard/nonmachinable letter-shaped mail collected "Postage Due." If you do not confirm, please explain.

d. Refer to the response to part c.i. Please confirm that where carriers make "pick-ups at delivery points" which include nonstandard/nonmachinable letter-shaped mail, carriers do not mark such letter-shaped mail picked-up "Postage Due." If you do not confirm, please explain.

e. Refer to the response to part c.i. Please confirm that carriers making stops on "collection routes" to collect mail do not mark nonstandard/nonmachinable letter-shaped mail collected "Postage Due." If you do not confirm, please explain.

f. Refer to the response to part t., where it states that "Clerks and carriers also mark pieces postage due." Please confirm that the term "clerks" as used in the statement above has the same meaning as the term "retail acceptance personnel" as used in the response to OCA/USPS-63. If you do not confirm, please explain.

g. Refer to the response to part t., where it states that "Clerks and carriers also mark pieces postage due." At the carrier station, please confirm that letter-

shaped pieces presented to carriers for delivery will not be separated into trays of letter-shaped pieces subject to the proposed nonmachinable surcharge and trays of other letter-shaped pieces. If you do not confirm, please explain.

h. Refer to the response to part u., where it states "nonstandard/non-machinable *mailings*." (emphasis added) Where "nonstandard/non-machinable" letter-shaped pieces are not entered as mailings, please confirm that supervisors, nixie clerks, and carriers will not separate nonstandard/non-machinable letter-shaped pieces subject to the proposed surcharge from other manual letter-shaped pieces. If you do not confirm, please explain.

i. Refer to the response to part u., where it states that "processing personnel (e.g., supervisors, nixie clerks, etc.) and carriers handling nonstandard/non-machinable mailings could mark the pieces postage due." Please confirm that "processing personnel (e.g., supervisors, nixie clerks, etc.) and carriers handling nonstandard/non-machinable mailings" must place the "Postage Due" marking on letter-shaped pieces by hand stamp. If you do not confirm, please explain.

OCA/USPS-T39-10. Please refer to the response to OCA/USPS-168.

a. Refer to the response to part a., where it states that "Many Standard Mail flats are catalogs with bound edges." Please confirm that many Standard Mail flats are "enveloped." If you do not confirm, please explain.

b. Refer to the response to part a., where it states that "Many Standard Mail flats are catalogs with bound edges, while most First-Class Mail flats are enveloped." Would the use of envelopes with automation compatible, barcoded First-Class

flat-shaped pieces weighing two ounces vs. the use of bound-edged automation compatible, barcoded Standard Mail flat-shaped pieces weighing two ounces produce a small or large impact on the throughputs of the Advanced Flat Sorting Machine (AFSM) 100, the Flat Sorting Machine (FSM) 881, and the Flat Sorting Machine (FSM) 1000? Please explain and provide copies of any studies, reports, other documents, or communications that support the explanation.

c. Refer to the response to part a.

   i. Please provide the base year and test year volume, or an estimate of the volume, of First-Class and Standard Mail flat-shaped mail that is "enveloped;"

   ii. For the base year and test year, please provide the percent, or an estimate of the percent, of total First-Class and Standard Mail flat-shaped mail that is "enveloped;"

d. Refer to the response to part a., where it states "Though not specifically studied, these differences are likely to have an impact on the AFSM 100 operation." Please confirm that the term "differences" refers to physical differences in mailpiece characteristics. If you do not confirm, please explain.

e. Refer to the response to part a., where it states "Though not specifically studied, these differences are likely to have an impact on the AFSM 100 operation."

   i. Please identify any physical differences (other than bound edges and "enveloped") for automation compatible, barcoded First-Class and Standard Mail flat-shaped pieces weighing two ounces that affect throughput when processed on the AFSM 100, FSM 881, and FSM 1000.

ii. Please indicate whether each physical difference in mailpiece characteristics identified in subpart i. with respect to automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces has a positive or negative impact on throughput when processed on the AFSM 100, FSM 881, and FSM 1000. Please explain the basis for indicating any positive or negative impact.

iii. Please separately rank the positive and negative impacts indicated in subpart ii. from most important to least important for the AFSM 100, FSM 881, and FSM 1000.

iv. Please identify which (if any) of the positive and negative impacts from subpart iii. have been specifically estimated, quantified, or modeled by the Postal Service in the calculation of throughputs with respect to automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces processed on the AFSM 100, FSM 881, and FSM 1000.

f. Refer to the response to part a.

i. Please identify any factors (other than physical differences in mailpiece characteristics) for automation compatible, barcoded First-Class and Standard Mail flat-shaped pieces weighing two ounces that affect throughput when processed on the AFSM 100, FSM 881, and FSM 1000.

ii. Please indicate whether each factor identified in subpart i. with respect to automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces has a positive or negative impact on

throughput when processed on the AFSM 100, FSM 881, and FSM 1000. Please explain the basis for indicating any positive or negative impact.

iii. Please separately rank the positive and negative impacts indicated in subpart ii. from most important to least important for the AFSM 100, FSM 881, and FSM 1000.

iv. Please identify which (if any) of the positive and negative impacts from subpart iii. have been specifically estimated, quantified, or modeled by the Postal Service in the calculation of throughputs with respect to automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces processed on the AFSM 100, FSM 881, and FSM 1000.

g. Refer to the response to part a. Please confirm that automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces are processed on different sort plans. If you do not confirm, please explain.

h. Refer to the response to part a. To what extent are automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces processed on different sort plans on the AFSM 100, FSM 881, and FSM 1000? Please provide the frequency, or an estimate of the frequency, with which this occurs for AFSM 100, FSM 881, and FSM 1000 processing.

i. Refer to the response to part a. Please confirm that First-Class sort plans for automation compatible, barcoded flat-shaped pieces weighing two ounces involve the use of more stackers as compared to automation compatible,

barcoded Standard Mail flat-shaped pieces weighing two ounces. If you do not confirm, please explain.

j. Refer to the response to part a. To what extent do First-Class sort plans for automation compatible, barcoded flat-shaped pieces weighing two ounces involve the use of more stackers as compared to automation compatible, barcoded Standard Mail flat-shaped pieces weighing two ounces? Please provide the frequency, or an estimate of the frequency, with which this occurs for AFSM 100, FSM 881, and FSM 1000 processing.

k. Refer to the response to part a. Would your response to the hypothetical posed in part a. change if the group that paid the First-Class rate were entered in bulk? Please explain.

l. Refer to the response to part b. "[A]bsent testing," please provide copies of any studies, reports, other documents, or communications that discuss the impact of different First-Class Mail and Standard Mail sort plans on productivities.

m. Refer to the response to part d. Refer also to the hypothetical posed in OCA/USPS-168(a). Please quantify the effect on the unit cost of automation compatible, barcoded First-Class and Standard Mail flat-shaped pieces weighing two ounces caused by the changes in throughput cited in response to part a. when such mail is processed on the AFSM 100. Please quantify the effect on the unit cost when such mail is processed on the FSM 881 and FSM 1000.

n. Refer to the response to part d. Refer also to the hypothetical posed in OCA/USPS-168(b). Please quantify the effect on the unit cost of automation compatible, barcoded First-Class and Standard Mail flat-shaped pieces weighing

two ounces caused by the changes in productivity cited in response to part b. when such flat-shaped pieces are processed on the AFSM 100. Please quantify the effect on the unit cost when such letter-shaped pieces are processed on the FSM 881 and FSM 1000.

o. Refer to the response to part d. Refer also to the hypothetical posed in OCA/USPS-168(c). Assuming the automation compatible, barcoded First-Class and Standard Mail flat-shaped pieces weighing two ounces are processed in one tour, please quantify the effect on the unit cost when such letter-shaped pieces are processed on the AFSM 100. Please quantify the effect on the unit cost when such letter-shaped pieces are processed on the FSM 881 and FSM 1000.

OCA/USPS-T39-11. Please refer to the response to OCA/USPS-169. Refer to the response to parts a. and b. In part a., it is stated that because "there are no mechanical differences in how the AFSM 100 feeds, transports, and sorts pieces of different weights, there should be no significant difference in the throughputs and velocities." However, in part b., the response does not confirm that the productivities for each group of 10,000 automation compatible, barcoded First-Class flat-shaped pieces, with one group weighing two ounces and the other weighed three ounces, would be the same. Given the response to part a., please explain why the productivities would not be the same.

OCA/USPS-T39-12. Please refer to page 3 of 4 of the attachment to the response to interrogatory OCA/USPS-175.

a. Please provide copies of the spreadsheets referred to at the bottom of that page.

b. Please provide all data on the "damage to the equipment" caused by 3.3, 3.5, and 3.7 ounce mail.

c. Please provide tables similar to the table on page 3 of 4 comparing 100 percent test decks of 3.5 and 3.7 ounce mail.

d. Please provide tables similar to the table on page 3 of 4 comparing two percent test decks of 3.3 and 3.5 ounce mail.

e. Please provide tables similar to the table on page 3 of 4 comparing two percent test decks of 3.5 and 3.7 ounce mail.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

Stephanie Wallace

Washington, D.C. 20268-0001
November 20, 2001