

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF DOUGLAS CARLSON  
(DFC/USPS-T22-1 AND 2)

The United States Postal Service hereby provides the responses of witness Miller to the following interrogatories of Douglas Carlson: DFC/USPS-T22-1 and 2, filed on November 14, 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

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Michael T. Tidwell

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November 28, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF DOUGLAS CARLSON

**DFC/USPS-T22-1.** Please refer to your revised testimony at pages 18–19 and your response to MMA/USPS-T22-15.

- a. Please identify the two facilities that replied to your survey and indicated that they did not have an 020B operation.
- b. Please specify the number of facilities that replied to your survey and indicated that their 020B operation removes the rubber bands from bundles of properly dated, faced, machinable metered letters and places these letters in trays for processing on an MLOCR. For any of the 96 facilities that have an 020B operation but that do not process metered bundles in the manner described in this interrogatory, please describe how these facilities process the metered bundles described in this interrogatory.
- c. Please confirm that proper procedure for processing metered bundles in the 020B operation is to remove the rubber bands from bundles of properly dated, faced, machinable metered letters and to place these letters in trays for processing on an MLOCR. If you do not confirm, please explain the proper procedure.
- d. Please identify the proper procedure for handling bundles of machinable metered letters that have an incorrect meter date. Specifically, should these letters be postmarked and cancelled with a proper date by an AFCS or similar machine?

**RESPONSE:**

- (a) Please see USPS LR-J-155 page 4 and page 12.
- (b) No facilities responding to this survey would have engaged in the activities described in this interrogatory as part of the 020B operation. The survey found in USPS LR-J-155 did not collect data regarding the processing of metered packages.
- (c) Not confirmed. Metered packages are not processed in the 020B operation.
- (d) Please see the attached response to DFC/USPS-T10-9(a) from Docket No. R2000-1.

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**DFC/USPS-T22-2.** Please refer to your revised testimony at pages 18–19 and your response to MMA/USPS-T22-15.

- a. Please confirm that the Denver P&DC removes the rubber bands from bundles of properly dated, faced, machinable metered letters that are separated by the culling system and enters these letters loose into the culling system for facing and canceling. If you do not confirm, please clarify your handwritten note reflected on page 2 of Attachment 2 to Response to MMA/USPS-T22-15(A).
- b. Please confirm that the Denver P&DC's practice described in part (a) of this interrogatory may cause some metered letters to be rejected from the culling system because the letters are too thick, and yet some of these letters are not so thick that they could not have been processed on an MLOCR if the letters in those bundles had instead been placed in trays and taken to an MLOCR. If you do not confirm, please explain.
- c. Were stations, branches, associate offices, and city collectors that the Denver P&DC serves instructed to separate metered bundles from loose letters and place the bundles in trays?
- d. Please confirm that the Denver P&DC's handling of metered bundles is inconsistent with proper Postal Service procedures for handling metered bundles. If you do not confirm, please explain.

**RESPONSE:**

- (a) Confirmed.
- (b) If a collection mail letter exceeds the length, height, or thickness requirement, culling mechanisms will remove the letter before it can be processed on the Advanced Facer Canceler System Input Sub System (AFCS-ISS). Were that letter to be entered in trays, the mail processing clerk that feeds the Multi Line Optical Character Reader Input Sub System (MLOCR-ISS) would be responsible for culling out nonmachinable mail pieces.  
  
All letter mail processing equipment has been designed around the "standard letter" dimension requirements. Mail pieces that do not meet these requirements are culled from the system in order to prevent jamming.

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**RESPONSE TO DFC/USPS-T22-1 (CONTINUED)**

- (c) Many plants, including the Denver Processing and Distribution Center (P&DC), have agreements with Delivery Units where employees will unpackage, face, and tray the metered packages entered at their facilities before they send that mail to the plant.
  
- (d) The procedures used at the Denver plant are not consistent with those outlined in the attachment to the response to DFC/USPS-T22-1(d). However, if you look at Attachment 2, page 2, in the response to MMA/USPS-T22-15(A), you will see that the discussion regarding the processing of metered bundles immediately precedes a discussion of how metered bundles are unpackaged and trayed at Delivery Units. My recollection is that the Denver plant recirculates metered bundles through the AFCS-ISS because the volume of the bundles culled from cancellation operations is so small given the fact that the Delivery Units unpackage and tray metered bundles. Consequently, the volume of metered bundles is not sufficient to support a traditional 020 meter belt operation.

## **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.

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Michael T. Tidwell

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