

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE
OCA/USPS-219(e) (ERRATA)

The United States Postal Service hereby provides its revised response to the following interrogatory: OCA/USPS-219(e), filed on November 14, 2001. The original response, filed on November 28, 2001, described the types of damage to automated mail processing equipment caused by nonmachinable letter-shaped pieces. The revised response more accurately reflects the nature and extent of the damage.

The 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

Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078; Fax -5402
November 30, 2001

Revised November 30, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-219 Please refer to the testimony of witness Kingsley (USPS-T-39) at page 10, lines 11-12.

- a. Please describe the types of damage referred to in the testimony that occur to machinable and nonmachinable letter-shaped pieces during automated mail processing.
- b. Please confirm that nonmachinable letter-shaped pieces that “impede the mail flow” may cause damage to subsequent machinable letter-shaped pieces during automated processing. If you do not confirm, please explain.
- c. Please confirm that nonmachinable letter-shaped pieces that “impede the mail flow” adversely affect the throughputs of automated mail processing equipment. If you do not confirm, please explain.
- d. Please confirm that nonmachinable letter-shaped pieces that “impede the mail flow” and cause damage to subsequent machinable letter-shaped pieces render such letter-shaped pieces nonmachinable. If you do not confirm, please explain.
- e. Please describe the types of damage referred to in the testimony that occur to automated mail processing equipment caused by nonmachinable letter-shaped pieces.

RESPONSE:

- (a) The piece can be either torn, crushed, and/or soiled. Also see response to MMA/USPS-T-39-6.
- (b) Confirmed.
- (c) Confirmed. See response to OCA/USPS-44.

Revised November 30, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

- (d) Not confirmed. Some subsequent pieces are only minimally bent or torn and can still be processed in automation.
- (e) Broken belts and rollers, in addition to general wear and tear on the equipment, shorten the life of replaceable parts.

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.

Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 30, 2001