

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
(MMA/USPS-4)

The United States Postal Service hereby provides the response to the following interrogatory of Major Mailers Association: MMA/USPS-4, filed on November 21, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 5, 2001

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TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION

MMA/USPS-4 Please refer to your response to Part I of Interrogatory OCA/USPS-145. There you discuss potential cost differences between First-Class and Standard Mail processing costs if very large mailings were offered to the Postal Service.

- A. Please discuss any operational problems that might occur if the Postal Service were to receive a large mailing of 1 million non-presorted, non-barcoded letters at a window, dock or BMEU.
- B. Would the Postal Service meet its delivery standards under these circumstances?
- C. How large would the mailing have to be before the Postal Service would fail to meet its delivery standards?
- D. At what time would all the letters have to be processed by in order to meet its delivery standards?

Response:

- A. It depends. The primary factors would be the geographic location where the mail was entered and the nature of the mail. Your question encompasses one million pieces of non-machinable First Class Mail dropped without warning at a small, geographically remote plant in December without prior warning as one extreme, and one million pieces of OCR readable Standard letters at a large urban plant in July with plenty of warning at the opposite extreme. In the first instance, the plant might use their limited manual capability to sort the mail into 3-digit ZIP Code ranges suitable for dispatch to large plants in the appropriate areas. If the mail was machinable but not OCR readable, it could overwhelm a Remote Encoding Center which might respond by encoding the mail to only the first 5 digits of the ZIP Code to get as much processed on time as possible. If the mail is OCR readable with sufficient plant capacity on the night in question, the mailing would be handled in the normal course of business. Employees would be called in on their day off and

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overtime authorized as necessary. Obviously, all of these tactics work better with prior warning. For Standard Mail, the processing differences described in OCA/USPS-145 apply. Also see response to GCA/USPS-T-29-25b.

B. It depends. See part a.

C. It depends. See part a.

D. In witness Kingsley's testimony (USPS-T10, pages 28 and 29) from Docket No. R2000-1, the processing schedule for First-Class Mail is described. For Standard Mail, the color-coding standards require origin processing on the next day.

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

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