

UNITED STATES OF AMERICA
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

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY
(OCA/USPS-T39-15-17)
December 5, 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,



SHELLEY S. DREIFUSS
Acting Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T39-15. Please refer to the response to OCA/USPS-219(d).

- a. In your visits to postal mail processing facilities, have you personally observed the phenomenon of nonmachinable letter-shaped pieces impeding the mail flow on automated mail processing equipment so as to cause damage to subsequent machinable letter shaped pieces? If so, please estimate the number of times you have observed this phenomenon.
- b. Based upon your observations, or the observations/experience of operations or engineering personnel, how many subsequent machinable letter-shaped pieces on average are affected by the phenomenon of a nonmachinable letter-shaped piece impeding the mail flow on automated mail processing equipment.
- c. Based upon your observations, or the observations/experience of operations or engineering personnel, of the subsequent machinable letter-shaped pieces that are damaged, how many on average are only minimally damaged and can still be processed on automated mail processing equipment?
- d. Based upon your observations, or the observations/experience of operations or engineering personnel, of the subsequent machinable letter-shaped pieces that are damaged, how many on average are so damaged that they can no longer be processed on automated mail processing equipment and must be manually processed?

OCA/USPS-T39-16. Please refer to the response to VP/USPS-4, Attachment A.

- a. Refer to the response to part a., where it references “manual sortation cost pools,” “allied cost pools,” and “mechanized sortation cost pools” in Attachment A.
 - i. Please list the “manual sortation cost pools” from Attachment A.
 - ii. Please list the “allied cost pools” from Attachment A.
 - iii. Please list the “mechanized sortation cost pools” from Attachment A.
- b. Refer to the table entitled “Percent Difference 2-3 oz. to 0-1 oz.” Consider only the “FC Single Piece” column and the following cost pools: BCS/ and OCR/. Please explain why it is reasonable for unit mail processing costs for single-piece letters to increase 129 percent and 198 percent, respectively, from the 0-1 oz. to the 2-3 oz weight range.
- c. Refer to the table entitled “Percent Difference 2-3 oz. to 0-1 oz.” Consider only the “FC Single Piece” column and the following cost pools: MANL, 1CANCMPP, 1OPPREF, 1PLATFRM, and 1POUCHNG. Please explain why it is reasonable for unit mail processing costs for single-piece letters to increase 389 percent, 556 percent, 451 percent, 482 percent, and 525 percent, respectively, from the 0-1 oz. to the 2-3 oz weight range.
- d. Refer to the table entitled “Percent Difference 2-3 oz. to 0-1 oz.” Consider only the “FC Presort” column and the following cost pools: BCS/, BCS/DBCS and OCR/. Please explain why it is reasonable for unit mail processing costs for presort letters to increase 515 percent, 297 percent, and 167 percent, respectively, from the 0-1 oz. to the 2-3 oz weight range.

- e. Refer to the table entitled "Percent Difference 2-3 oz. to 0-1 oz." Consider only the "FC Presort" column and the following cost pools: MANL, 1CANCMPP, 1OPPREF, 1PLATFRM, and 1POUCHNG. Please explain why it is reasonable for unit mail processing costs for presort letters to increase 788 percent, 4,142 percent, 578 percent, 502 percent, and 718 percent, respectively, from the 0-1 oz. to the 2-3 oz weight range.

OCA/USPS-T39-17. Please refer to the responses to the following interrogatories: OCA/USPS-6, 8, 10,11, 21,32, 42-44, 47-49, 62, 63, 92, 93(c)-(j), 144, 148, 160, 161, 164, 174-176, 218, 219, and 222. Do you agree with the response of the Postal Service to the interrogatories listed above? If you do not agree with any response thereto, please provide your response.

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
December 5, 2001