

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 MICHAEL W. MILLER
(OCA/USPS-T22-1-5)
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
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OCA/USPS-T22-1. Please refer to the responses to OCA/USPS-174(a), OCA/USPS-176(a), and USPS-LR-J-60 at pages 46 and 81. In the response to OCA/USPS-174(a), the Postal Service states that it “seems intuitive” that there is a correlation between weight and thickness of mailpieces. In the response to OCA/USPS-176(a), the Postal Service states that experience reveals that thicker pieces tend to jam automated mail processing equipment more frequently, causing negative impacts on throughput and productivity.

- a. Please confirm that 78.5 percent, 16.9 percent and 3.6 percent of Standard Mail letter-shaped pieces weigh between 0 to 1, >1 to 2, and >2 to 3 ounces, respectively. If you do not confirm, please explain.
- b. Please confirm that 94.9 percent, 4.1 percent and 0.7 percent of single-piece First-Class Mail letter-shaped pieces weigh between 0 to 1, >1 to 2, and >2 to 3 ounces, respectively. If you do not confirm, please explain.
- c. Please confirm that Standard Mail letter-shaped pieces have a greater average weight per piece in the 0 to 3 ounce weight range than single-piece First-Class letter-shaped pieces. If you do not confirm, please explain.
- d. Please confirm that the marginal volume variable productivities for Standard Mail letter-shaped pieces should be judgmentally reduced to reflect the negative impact on the productivities caused by the greater average weight of Standard Mail letter-shaped pieces in the 0 to 3 ounce weight range. If you do not confirm, please explain.

OCA/USPS-T22-2. Please refer to USPS-LR-J-60 (revised 11-15-01), File: fcmrev2.xls, Sheet: NONAUTO LTR DEAVG. In cells E18 – E25, the first figure in the formula in each cell is 3748977. Please provide a citation for this figure, and show all calculations used in its derivation.

OCA/USPS-T22-3. Please refer to USPS-LR-J-60 (revised 11-15-01), File: fcmrev2.xls, Sheet: MACH SP COSTS, Column (1). Please confirm that the average number of sorts per piece for “First-Class Mail Single-Piece Machinable Letters” is 4.4207 (the sum of all figures Column (1) divided by 10,000). If you do not confirm, please provide the average number of sorts per piece and show all calculations. Also, please provide the average number of sorts per piece for all First-Class Single-Piece, First-Class Presort, and Standard Regular cost models. If you cannot provide the average number of sorts per piece, please rank the First-Class Single-Piece, First-Class Presort, and Standard Regular from highest to lowest in terms of the average number of sorts per piece.

OCA/USPS-T22-4. Please refer to USPS-LR-J-60 (revised 11-15-01). Please provide the entry profile for single-piece First-Class letters.

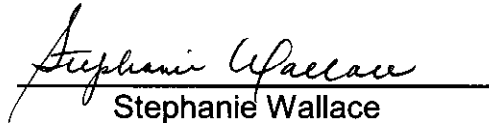
- a. Please provide the entry profile for single-piece First-Class letters.
- b. Please provide the mail flow densities for single-piece First-Class letters.
- c. Please explain how the relevant cost models account for residual First-Class presort letters.
- d. Please provide the mail flow densities for residual First-Class presort letters.

OCA/USPS-T22-5. Please refer to the responses to the following interrogatories:

OCA/USPS-12, 13, 35-38, 86(a), 142, and 143. 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