UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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-T39-18-21)
December 7, 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,

Emmett Rand Costich

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OCA/USPS-T39-18. Please refer to your response to OCA/USPS-T39-11, where it states that you "would expect a slight productivity difference [for thicker flats] since flat trays would fill up faster requiring more frequent sweeping . . ." Also, please refer to the response to OCA/USPS-174(c), which states that

> with the impact that [letter-shaped] piece thickness has on the rate at which trays are fed, stackers filled, trays filled and replaced it would be expected that thickness would have some impact on throughput/productivity.

Please explain how the processing of thicker letter-shaped and flat-shaped pieces would have some negative impact on automated letter- and flat-shaped mail processing throughput and productivity. For example, does the Postal Service assign additional employees in order to sweep the letter trays and flat tubs that are filling up more rapidly? Or, does the mail processing equipment automatically stop processing when some letter stackers and flat tubs are full, waiting to be emptied? Or, is there some other explanation?

OCA/USPS-T39-19. Please refer to your testimony at page 7, lines 12-13, which states that the Carrier Sequence Bar Code Sorter (CSBCS) has a throughput of "approximately 19,000 pieces per hour with a staffing index of one." Also, please refer to USPS-LR-J-60 (revised 11-15-01), at page 46, and the "MODS Productivity" of 28,156 for "Incoming CSBCS Secondary DPS (3 Pass)." Please explain how the CSBCS, with a throughput of 19,000 pieces per hour and a staffing index of one, can have a MODS productivity of 28,156. Please show all calculations used to derive the MODS Productivity.

OCA/USPS-T39-20. Please describe the outgoing mail processing operations performed at Customer Service Units (CSUs). Is the depth of sort achieved at CSUs equivalent to that achieved at Processing and Distribution Centers (P&DCs)? If not, please explain.

OCA/USPS-T39-21. Please describe the outgoing mail processing operations performed at Processing and Distribution Facilities (P&DFs). Is the depth of sort achieved at P&DFs equivalent to that achieved at P&DCs? If not, please explain.

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 7, 2001