

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
WITNESS KINGSLEY TO INTERROGATORIES OF OFFICE OF THE
CONSUMER ADVOCATE
(OCA/USPS-T39-15, 16(b)-(e), and 17)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T39-15, 16(b)-(e), and 17, filed on December 5, 2001. OCA/USPS-T39-16(a) was redirected to the Postal Service and will be answered separately.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 19, 2001

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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?

RESPONSE:

- a. Yes.
- b. I have not studied or kept track of these data. I would guess that the number would be fairly small.
- c. All automated letter equipment are equipped with a dynamic brake to stop the running equipment when a jam occurs. The vast majority of jams do not create mail damage. Some damage may occur but it is not always caused by non-automatable mail. I would estimate that most minimally damaged pieces can still be processed on automated mail processing equipment.

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- d. I would estimate that very few pieces are damaged to the point that manual processing is necessary.

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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, 1 PLATFRM, and 1 POUCHNG. 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 0-1oz. 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, 10PPREF, 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.

RESPONSE:

a. Redirected to the Postal Service.

b. – e. I am not a costing witness, but see witness Schenk’s response to

ABA&NAPM/USPS-T43-14c. Further, I am told that the average 2-3 oz. FCM letter is

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actually about 5 times heavier than the average 0-1 oz FCM letter (5.9 for single piece and 4.33 for presort), so these results are not that surprising to me.

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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.

RESPONSE:

I have no reason to disagree with the institutional responses. However, that does not mean that I am knowledgeable on the details of each and every one of those listed.

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.

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