

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-T39-18-21)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T39-18-21, filed on December 7, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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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?

RESPONSE:

On old MPBCS and OCR equipment, the feeder stops when a bin fills up. On the other letter and flat sorting equipment, mail pieces go to an overflow bin when the corresponding distribution stacker is full. These overflow pieces must then be re-run on the machine for distribution. Either occurrence negatively impacts productivity. If a bin near the feed station fills up, the loader may sweep that bin, but that action would, of course, increase the probability of the feeder running out of mail.

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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.

RESPONSE:

The latest information I have received from Engineering is that the minimum production throughput of a CSBCS would be 36,800 pieces. However, this is misleading since the CSBCS has a total capacity of only running 3,000 pieces on any one pass (on a 17 stacker machine). Therefore, it is not possible to run 36,800 pieces “straight” at one time. Given this information the MODS productivity of 28,156 is reasonable.

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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.

RESPONSE:

If the facility has letter automation, it will sort outgoing letters and cards to the same depth of sort as P&DCs (to AADCs). CSUs without letter automation will instead sort to the ADC network. Outgoing flats and parcels at CSUs and P&DCs are sorted to the same depth of sort.

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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.

RESPONSE:

The outgoing mail processing operations, including depth of sort, at P&DFs are similar to those performed at P&DCs. See my testimony for various outgoing descriptions (pages 2 –9 for letters, pages 14-17 for flats, pages 21-24 for parcels, bundles and sacks). See response to KE/USPS-T39-1, redirected to witness Miller, for a description of First-Class letter outgoing processing.

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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