

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 INTERROGATORY OF OFFICE OF THE
CONSUMER ADVOCATE
(OCA/USPS-T39-23)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-T39-23, filed on December 19, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 2, 2002

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TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T39-23 Please refer to your response to OCA/USPS-T39-13(a), concerning the processing of letter-shaped pieces

- a. Please explain what is meant by the phrase “a change in the pattern,” and give examples.
- b. Will stackers fill up faster or slower for automation compatible, barcoded First-Class letter-shaped pieces as compared to automation compatible, barcoded Standard Regular letter-shaped pieces. Please explain.
- c. In the response to OCA/USPS-145(a), it is stated that First-Class sort plans likely involve the use of more stackers. Please confirm that each stacker on average will fill up more slowly for a given volume of letter-shaped pieces. If you do not confirm, please explain.
- d. Please define the term “sweeping,” and describe what activities are involved in sweeping.
- e. What is the difference between “sweeping,” and the “removal of full trays?”

RESPONSE:

- a. The “pattern” refers to the location of the stackers that fill up first, second, third, etc. If the high-density stacker pattern is widely separated on the machine, the sweeper will spend more time moving between stackers and thus there will be a greater average delay in emptying individual full stackers. Of course, when a stacker is full, the mail goes to an overflow bin to be rerun, thus lowering productivity.
- b. – c. If the mail pieces are otherwise identical and the First-Class scheme utilizes more stackers, then it is a mathematical certainty that on the average, stackers on the First-Class scheme will fill more slowly than stackers on the Standard scheme. However, as explained in my response to subpart a, the pattern is probably more important than a small change in the average fill rate. Furthermore, the average mail piece characteristics for First-Class and Standard mail are certainly different.

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Standard Mail letters are heavier and thicker on average than First Class Mail and generally fill up stackers and trays at a faster rate.

- d. – e. Sweeping in this context means to remove mail from a stacker and place it in a tray. This also includes removing trays as they become full. “Sweeping out a machine” includes sweeping and removing all trays from automation.

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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