BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 RECEIVED

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POSTAL RAVE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF POSTAL SERVICE WITNESS COCHRANE TO UPS INTERROGATORIES (UPS/USPS-T40-2-4)

The United States Postal Service hereby provides the response of Postal Service witness Cochrane to the following interrogatories of United Parcel Service: UPS/USPS-T40-2-4, filed on December 11, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 January 4, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS COCHRANE TO INTERROGATORIES OF THE UNITED PARCEL SERVICE

UPS/USPS-T40-2. Refer to your response to interrogatory UPS/USPS-20 (redirected from the Postal Service) regarding Priority Mail performance in FY2001, in which you mention "lessons learned from the original PMPC sites."

- (a) What were the "lessons learned from the original PMPC sites"?
- (b) What measures were taken in response to those lessons?
- (c) How and to what extent did the measures taken in response to those lessons translate into improved Priority Mail performance?
- (d) How and to what extent will the measures taken in response to those lessons improve Priority Mail performance in the Test Year?

RESPONSE:

- (a) As stated in my testimony (USPS-T-40), page 10, lines 20 through 22,
 "Specifically, the Postal Service is examining shape-based processing and
 automated flat processing equipment (FSM 1000 and SPBS) for potential
 productivity improvements."
 In addition, as stated in my testimony, page 5, lines 22 through 24,
 "Instead of a primary sort to the first three digits of the ZIP Code, the
- (b) Additional flat processing equipment is being tested and explored for Priority Mail processing, and all Postal operated PMPCs are processing the primary sort to the first digit of the ZIP Code.

primary sort was to the first digit (0-9)".

- (c) Currently, there have been no improvements to Priority Mail performance.

 The Postal Service is anticipating that the actions taken today translate into improved Priority Mail service in the future.
- (d) As equipment is added to more facilities and more facilities incorporate standardized processing, the Postal Service is expecting Priority Mail productivity to increase thus permitting more timely and consistent service.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS COCHRANE TO INTERROGATORIES OF THE UNITED PARCEL SERVICE

UPS/USPS-T40-3. Refer to your response to interrogatory UPS/USPS-20 (redirected from the Postal Service) regarding Priority Mail performance in FY2001, in which you discuss "[s]tandardization of mail processing."

(a) What measures were taken to introduce "[s]tandardization in mail processing" in FY2001?

(b) How and to what extent did standardization in mail processing improve Priority Mail performance in FY2001?

(c) How and to what extent will standardization in mail processing improve Priority Mail performance in the Test Year?

RESPONSE:

- (a) The Postal Service continued to utilize the PMPCs sorting methodology instead of a primary sort to the first three digits of the ZIP Code, the primary sort is to the first digit of the ZIP Code.
- (b) We have no quantifiable performance results at this time that are directly linked to the standardization of the primary sort by the facilities utilizing it.
- (c) As more facilities incorporate the new primary sort methodology and as more processing equipment is added to more facilities, the Postal Service expects more timely and consistent service.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS COCHRANE TO INTERROGATORIES OF THE UNITED PARCEL SERVICE

UPS/USPS-T40-4. Refer to your response to interrogatory UPS/USPS-21 (redirected from the Postal Service) regarding "possible courses of action" Postal Service management is considering to improve Priority Mail performance from the end of FY2001 through the Test Year. Describe each of these "possible courses of action" and describe the extent to which each is expected to improve Priority Mail performance in FY2002 and FY2003 if implemented.

RESPONSE:

Please see my testimony (USPS-T-40), page 12, lines 6 through 21.

DECLARATION

I, James P. Cochrane, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Date: 1-4-01

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.

Richard T. Cooper

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