

# Official Transcript of Proceedings

*Before the*

POSTAL RATE COMMISSION

RECEIVED

FEB 13 11 08 AM '02

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of:

Postal Rate and Fee Changes

Docket No. R2001-1

VOLUME 10-B

Designation of Institutional Responses filed  
In Response to P.O. Ruling R2001-1/23

DATE: February 8, 2002

PLACE: Washington, DC

PAGES: 3059 through 3401

---

## HERITAGE REPORTING CORPORATION

*Official Reporters*

1220 L Street, NW, Suite 600

Washington, DC 20005-4018

(202)628-4888

[hrc@concentric.net](mailto:hrc@concentric.net)

INTERROGATORY RESPONSES OF  
UNITED STATES POSTAL SERVICE  
DESIGNATED AS WRITTEN CROSS-EXAMINATION

Interrogatory

Designating Parties

**Volume 10-A**

ABA&NAPM/USPS-T22-1 redirected to USPS	ABA&NAPM
ABA&NAPM/USPS-T22-4 redirected to USPS	ABA&NAPM
ABA&NAPM/USPS-T22-11 redirected to USPS	ABA&NAPM
ABA&NAPM/USPS-T22-21 redirected to USPS	ABA&NAPM
ABA&NAPM/USPS-T22-33 redirected to USPS	ABA&NAPM
ABA&NAPM/USPS-T22-35 redirected to USPS	ABA&NAPM
ABA&NAPM/USPS-T29-12c redirected to USPS	OCA
ABA&NAPM/USPS-T39-3 redirected to USPS	OCA
ABA&NAPM/USPS-T39-5 redirected to USPS	ABA&NAPM, OCA, UPS
ABA&NAPM/USPS-T39-6 redirected to USPS	ABA&NAPM, OCA, UPS
ABM-MH/USPS-1	ABM-MH, MPA
ABM-MH/USPS-2	ABM-MH
ABM-MH/USPS-3	ABM-MH
ABM-MH/USPS-4	ABM-MH
ABM-MH/USPS-5	ABM-MH
ABM-MH/USPS-6	ABM-MH
ABM-MH/USPS-7	ABM-MH
ABM-MH/USPS-8	ABM-MH
ABM-MH/USPS-T34-13 redirected to USPS	MPA, NAA
AMZ/USPS-T2-7 redirected to USPS	UPS
AOL-TW/USPS-1	AOL-TW, UPS
AOL-TW/USPS-2	AOL-TW, UPS
AOL-TW/USPS-3	AOL-TW, UPS
AOL-TW/USPS-4	AOL-TW, UPS
AOL-TW/USPS-5	AOL-TW, UPS
AOL-TW/USPS-6	AOL-TW
AOL-TW/USPS-7	AOL-TW
AOL-TW/USPS-8	AOL-TW
AOL-TW/USPS-9	AOL-TW
AOL-TW/USPS-10	AOL-TW

InterrogatoryDesignating Parties

AOL-TW/USPS-11	AOL-TW, UPS
AOL-TW/USPS-12	AOL-TW, UPS
AOL-TW/USPS-13	AOL-TW
AOL-TW/USPS-14	AOL-TW
AOL-TW/USPS-15	AOL-TW
AOL-TW/USPS-16	AOL-TW
AOL-TW/USPS-17	UPS
AOL-TW/USPS-18	AOL-TW
AOL-TW/USPS-19	AOL-TW, UPS
AOL-TW/USPS-20	AOL-TW, UPS
AOL-TW/USPS-21	AOL-TW
AOL-TW/USPS-22	AOL-TW
AOL-TW/USPS-23	AOL-TW
AOL-TW/USPS-24	AOL-TW
AOL-TW/USPS-25	AOL-TW
AOL-TW/USPS-26	AOL-TW
AOL-TW/USPS-27	AOL-TW
AOL-TW/USPS-28	AOL-TW
AOL-TW/USPS-29	AOL-TW, UPS
AOL-TW/USPS-30	AOL-TW
AOL-TW/USPS-31	AOL-TW
AOL-TW/USPS-32	AOL-TW
AOL-TW/USPS-33	AOL-TW
AOL-TW/USPS-34	AOL-TW
AOL-TW/USPS-T13-1a redirected to USPS	AOL-TW
AOL-TW/USPS-T13-1b redirected to USPS	AOL-TW
AOL-TW/USPS-T13-3 redirected to USPS	AOL-TW, UPS
AOL-TW/USPS-T13-4a redirected to USPS	AOL-TW, UPS
AOL-TW/USPS-T13-4c redirected to USPS	AOL-TW, UPS
AOL-TW/USPS-T13-4d redirected to USPS	AOL-TW, UPS
AOL-TW/USPS-T13-4f redirected to USPS	AOL-TW, UPS
AOL-TW/USPS-T13-4h redirected to USPS	AOL-TW, UPS
AOL-TW/USPS-T13-4i redirected to USPS	AOL-TW, UPS
DBP/USPS-10	OCA
DBP/USPS-11	OCA
DBP/USPS-12	OCA
DBP/USPS-13	OCA
DBP/USPS-14	OCA
DBP/USPS-15	OCA
DBP/USPS-16	OCA

InterrogatoryDesignating Parties

DBP/USPS-17	OCA, UPS
DBP/USPS-30	OCA
DBP/USPS-35	OCA
DBP/USPS-43	OCA
DBP/USPS-44	OCA
DBP/USPS-46	OCA
DBP/USPS-53	OCA
DBP/USPS-54	OCA
DBP/USPS-55	OCA, UPS
DBP/USPS-56	OCA
DBP/USPS-57	OCA
DBP/USPS-63	OCA
DBP/USPS-64	UPS
DBP/USPS-65	OCA
DBP/USPS-66	OCA
DBP/USPS-69	OCA
DBP/USPS-71	OCA
DBP/USPS-73	UPS
DBP/USPS-74	OCA
DBP/USPS-81	OCA
DBP/USPS-86	OCA
DBP/USPS-91	OCA
DBP/USPS-92	OCA
DBP/USPS-95	OCA
DBP/USPS-97	OCA
DBP/USPS-98	OCA
DBP/USPS-99	OCA
DBP/USPS-102	OCA
DBP/USPS-103	OCA
DFC/USPS-1	OCA
DFC/USPS-2	OCA
DFC/USPS-3	OCA
DFC/USPS-4	OCA
DFC/USPS-5	NAA, OCA
DFC/USPS-6	NAA, OCA
DFC/USPS-7	OCA
DFC/USPS-8	NAA, OCA, UPS
DFC/USPS-9	OCA
DFC/USPS-10	OCA, UPS
DFC/USPS-11	OCA
DFC/USPS-12	OCA



InterrogatoryDesignating Parties

DFC/USPS-13	OCA, UPS
DFC/USPS-15	OCA
DFC/USPS-17	OCA
DFC/USPS-18	OCA
DFC/USPS-19	OCA
DFC/USPS-T28-2a redirected to USPS	NAA, UPS
DFC/USPS-T28-2b redirected to USPS	NAA, UPS
DFC/USPS-T28-2c redirected to USPS	NAA, UPS
DFC/USPS-T28-2e redirected to USPS	NAA, UPS
DFC/USPS-T28-2f redirected to USPS	NAA, UPS
DFC/USPS-T28-2g redirected to USPS	NAA, UPS
DFC/USPS-T28-2h redirected to USPS	NAA, UPS
KE/USPS-1	OCA
MMA/USPS-3	OCA, UPS
MMA/USPS-4	OCA
MMA/USPS-6	OCA
MMA/USPS-T22-3 redirected to USPS	ABA&NAPM
MMA/USPS-T22-4b redirected to USPS	OCA
MMA/USPS-T22-4c redirected to USPS	OCA
MMA/USPS-T22-4d redirected to USPS	OCA
MMA/USPS-T22-6b redirected to USPS	UPS
MMA/USPS-T22-6c redirected to USPS	UPS
MMA/USPS-T22-7d redirected to USPS	ABA&NAPM
MMA/USPS-T22-7e redirected to USPS	ABA&NAPM
MMA/USPS-T22-20b redirected to USPS	OCA
MMA/USPS-T22-20c redirected to USPS	OCA
MMA/USPS-T22-20d redirected to USPS	OCA
MMA/USPS-T22-20e redirected to USPS	OCA
MMA/USPS-T22-28c redirected to USPS	ABA&NAPM
MMA/USPS-T22-28d redirected to USPS	ABA&NAPM
MMA/USPS-T22-28e redirected to USPS	ABA&NAPM
MMA/USPS-T22-28f redirected to USPS	ABA&NAPM
MMA/USPS-T22-39c redirected to USPS	OCA, PRC
MMA/USPS-T22-39d redirected to USPS	PRC
MMA/USPS-T22-42 redirected to USPS	OCA
MMA/USPS-T22-48a redirected to USPS	OCA
MMA/USPS-T22-48b redirected to USPS	OCA
MMA/USPS-T22-48c redirected to USPS	OCA
MMA/USPS-T22-48e redirected to USPS	OCA
MMA/USPS-T22-76 redirected to USPS	MMA
MMA/USPS-T28-1 redirected to USPS	NAA

InterrogatoryDesignating Parties

MPA/USPS-2	MPA
MPA/USPS-3	MPA
MPA/USPS-4	MPA
MPA/USPS-5	MPA
MPA/USPS-6	MPA
MPA/USPS-7	MPA
MPA/USPS-8	MPA, UPS
MPA/USPS-9	MPA
MPA/USPS-10	MPA
MPA/USPS-12	MPA
MPA/USPS-13	MPA
MPA/USPS-T34-35 redirected to USPS	MPA, UPS
MPA/USPS-T39-7 redirected to USPS	MPA
MPA/USPS-T43-1 redirected to USPS	MPA
MPA/USPS-T43-5b redirected to USPS	MPA
NAA/USPS-T39-1 redirected to USPS	NAA, UPS, Val-Pak
NAA/USPS-T39-2 redirected to USPS	NAA, Val-Pak
NAA/USPS-T39-3 redirected to USPS	NAA, Val-Pak
NAA/USPS-T39-4 redirected to USPS	NAA, Val-Pak
NAA/USPS-T39-5 redirected to USPS	NAA
NAA/USPS-T39-6 redirected to USPS	Advo, NAA
NAA/USPS-T39-7 redirected to USPS	NAA
NAA/USPS-T39-8 redirected to USPS	NAA, Val-Pak
NAA/USPS-T39-9 redirected to USPS	NAA
NAA/USPS-T39-10 redirected to USPS	NAA
NAA/USPS-T39-11 redirected to USPS	NAA
NAA/USPS-T39-12 redirected to USPS	Advo, NAA, UPS
OCA/USPS-1	NAA, OCA
OCA/USPS-2a	OCA
OCA/USPS-2b	OCA
OCA/USPS-4	OCA, UPS
OCA/USPS-5	OCA
OCA/USPS-6	NAA, OCA
OCA/USPS-7	OCA
OCA/USPS-7b	UPS
OCA/USPS-8	NAA, OCA
OCA/USPS-9	OCA
OCA/USPS-10	OCA
OCA/USPS-11	OCA
OCA/USPS-12	OCA
OCA/USPS-13	OCA



InterrogatoryDesignating Parties**Volume 10-B**

OCA/USPS-52	OCA, UPS
OCA/USPS-53	OCA
OCA/USPS-54	OCA
OCA/USPS-55	OCA
OCA/USPS-56	OCA
OCA/USPS-57	OCA
OCA/USPS-58	OCA
OCA/USPS-59	OCA
OCA/USPS-60	NAA
OCA/USPS-60a	OCA
OCA/USPS-60b	OCA
OCA/USPS-60c	OCA
OCA/USPS-60d	OCA
OCA/USPS-60e	OCA
OCA/USPS-60f	OCA
OCA/USPS-60g	OCA
OCA/USPS-61	OCA
OCA/USPS-62	OCA
OCA/USPS-63	OCA
OCA/USPS-64	OCA, UPS
OCA/USPS-65	OCA
OCA/USPS-74	OCA
OCA/USPS-75	OCA
OCA/USPS-76	OCA
OCA/USPS-79	OCA
OCA/USPS-80	OCA, UPS
OCA/USPS-81	OCA
OCA/USPS-83	OCA
OCA/USPS-84	OCA
OCA/USPS-85	OCA
OCA/USPS-86a	OCA
OCA/USPS-89	OCA
OCA/USPS-90	OCA
OCA/USPS-91h	OCA
OCA/USPS-91i	OCA
OCA/USPS-92	OCA, UPS
OCA/USPS-93c	OCA, UPS
OCA/USPS-93d	OCA, UPS

InterrogatoryDesignating Parties

OCA/USPS-93e	OCA, UPS
OCA/USPS-93f	OCA, UPS
OCA/USPS-93g	OCA, UPS
OCA/USPS-93h	OCA, UPS
OCA/USPS-93i	OCA, UPS
OCA/USPS-93j	OCA, UPS
OCA/USPS-95	OCA
OCA/USPS-96	OCA
OCA/USPS-97	OCA
OCA/USPS-98	OCA
OCA/USPS-100	NAA, OCA
OCA/USPS-101	OCA
OCA/USPS-102	OCA
OCA/USPS-103	NAA, OCA, UPS
OCA/USPS-105	NAA, OCA, UPS
OCA/USPS-106	OCA, UPS, Val-Pak
OCA/USPS-107	OCA, UPS
OCA/USPS-108	OCA
OCA/USPS-109	OCA, UPS
OCA/USPS-110	OCA, UPS
OCA/USPS-111	OCA, UPS
OCA/USPS-112	OCA, UPS
OCA/USPS-113	OCA
OCA/USPS-114	OCA
OCA/USPS-115	OCA
OCA/USPS-116	OCA
OCA/USPS-117	OCA
OCA/USPS-118	OCA
OCA/USPS-119b	OCA
OCA/USPS-120	OCA
OCA/USPS-121	OCA, UPS
OCA/USPS-122	OCA
OCA/USPS-123	OCA
OCA/USPS-124	NAA, OCA
OCA/USPS-125	OCA
OCA/USPS-126	OCA
OCA/USPS-127	OCA
OCA/USPS-128	OCA
OCA/USPS-129	OCA
OCA/USPS-130	OCA
OCA/USPS-131	OCA

InterrogatoryDesignating Parties

OCA/USPS-132	OCA
OCA/USPS-133	OCA
OCA/USPS-134	OCA
OCA/USPS-135	OCA
OCA/USPS-136	OCA
OCA/USPS-137	OCA
OCA/USPS-138	OCA
OCA/USPS-139	OCA
OCA/USPS-140	OCA
OCA/USPS-141	OCA
OCA/USPS-142	OCA
OCA/USPS-143	OCA
OCA/USPS-144	OCA
OCA/USPS-145	OCA
OCA/USPS-146	OCA
OCA/USPS-147	OCA
OCA/USPS-148	OCA
OCA/USPS-149	OCA, UPS
OCA/USPS-150	OCA
OCA/USPS-153	OCA
OCA/USPS-154	OCA, UPS
OCA/USPS-156	OCA
OCA/USPS-157	OCA
OCA/USPS-158	OCA
OCA/USPS-159	OCA
OCA/USPS-160	OCA
OCA/USPS-161	OCA, Val-Pak
OCA/USPS-162	OCA, Val-Pak
OCA/USPS-163	NAA, OCA
OCA/USPS-164	OCA
OCA/USPS-165	OCA
OCA/USPS-166	OCA
OCA/USPS-167	OCA
OCA/USPS-168	OCA
OCA/USPS-169	OCA
OCA/USPS-170	OCA
OCA/USPS-171	OCA
OCA/USPS-173	OCA
OCA/USPS-174	OCA
OCA/USPS-175	OCA, Val-Pak
OCA/USPS-176	OCA



InterrogatoryDesignating Parties**Volume 10-C**

OCA/USPS-200	OCA
OCA/USPS-201	OCA
OCA/USPS-202	OCA
OCA/USPS-203	OCA
OCA/USPS-204	OCA
OCA/USPS-205	OCA
OCA/USPS-206	OCA
OCA/USPS-207	OCA
OCA/USPS-208	OCA
OCA/USPS-209	OCA
OCA/USPS-210	OCA
OCA/USPS-211	OCA
OCA/USPS-212	OCA
OCA/USPS-213	OCA
OCA/USPS-214	OCA
OCA/USPS-215	OCA
OCA/USPS-216	OCA
OCA/USPS-217	OCA
OCA/USPS-218	OCA
OCA/USPS-219	OCA
OCA/USPS-220	OCA, UPS
OCA/USPS-221	OCA, UPS
OCA/USPS-222	OCA
OCA/USPS-223	OCA, UPS
OCA/USPS-224	OCA
OCA/USPS-225	OCA
OCA/USPS-226	OCA
OCA/USPS-227	OCA
OCA/USPS-228	OCA
OCA/USPS-229	OCA
OCA/USPS-230	OCA
OCA/USPS-235	OCA
OCA/USPS-236	OCA
OCA/USPS-237	OCA
OCA/USPS-238	OCA
OCA/USPS-241	OCA
OCA/USPS-242	OCA
OCA/USPS-244	OCA



InterrogatoryDesignating Parties

OCA/USPS-248	OCA
OCA/USPS-249	OCA
OCA/USPS-250	OCA
OCA/USPS-251	OCA
OCA/USPS-252	OCA
OCA/USPS-253	OCA
OCA/USPS-254	OCA
OCA/USPS-255	OCA
OCA/USPS-256	OCA
OCA/USPS-257	OCA
OCA/USPS-258	OCA
OCA/USPS-263	OCA
OCA/USPS-264	OCA
OCA/USPS-265	OCA, UPS
OCA/USPS-266	OCA, UPS
OCA/USPS-267	OCA, UPS
OCA/USPS-286	OCA, UPS
OCA/USPS-287	OCA
OCA/USPS-288	OCA
OCA/USPS-289	OCA
OCA/USPS-292	OCA
OCA/USPS-293	OCA
OCA/USPS-295	OCA, UPS
OCA/USPS-296	OCA
OCA/USPS-297	OCA
OCA/USPS-298	OCA
OCA/USPS-299	OCA
OCA/USPS-300	OCA
OCA/USPS-301	OCA
OCA/USPS-302	OCA
OCA/USPS-304	OCA, UPS
OCA/USPS-306a	OCA
OCA/USPS-308	NAA, OCA
OCA/USPS-309	OCA
OCA/USPS-310	OCA
OCA/USPS-312	OCA
OCA/USPS-T28-1a redirected to USPS	NAA, OCA
OCA/USPS-T28-1b redirected to USPS	NAA, OCA
OCA/USPS-T28-2b redirected to USPS	NAA, OCA
OCA/USPS-T28-2c redirected to USPS	NAA, OCA
OCA/USPS-T30-1 redirected to USPS	OCA

InterrogatoryDesignating Parties

OCA/USPS-T30-2 redirected to USPS	OCA
OCA/USPS-T30-17 redirected to USPS	OCA
OCA/USPS-T30-18 redirected to USPS	OCA, UPS
OCA/USPS-T30-19a redirected to USPS	OCA
OCA/USPS-T30-19b redirected to USPS	OCA
OCA/USPS-T30-19c redirected to USPS	OCA
OCA/USPS-T30-20a redirected to USPS	OCA, UPS
OCA/USPS-T30-21 redirected to USPS	OCA
OCA/USPS-T35-1 redirected to USPS	OCA
OCA/USPS-T36-8 redirected to USPS	OCA
OCA/USPS-T40-1 redirected to USPS	NAA, OCA, PRC, UPS
PostCom/USPS-T33-12d redirected to USPS	PostCom
PostCom/USPS-T39-4 redirected to USPS	MPA
PSA/USPS-T40-3e redirected to USPS	PSA
PSA/USPS-T40-3h redirected to USPS	PSA
PSA/USPS-T40-5 redirected to USPS	PSA
PSA/USPS-T40-6 redirected to USPS	PSA
PSA/USPS-T40-7 redirected to USPS	PSA
UPS/USPS-1	UPS
UPS/USPS-2a	UPS
UPS/USPS-2b	UPS
UPS/USPS-3	UPS
UPS/USPS-5	UPS
UPS/USPS-6	NAA, UPS
UPS/USPS-7	NAA, UPS
UPS/USPS-8	UPS
UPS/USPS-9	UPS
UPS/USPS-10	UPS
UPS/USPS-13	NAA
UPS/USPS-15	NAA
UPS/USPS-18	UPS
UPS/USPS-19	UPS
UPS/USPS-25	UPS
UPS/USPS-26	UPS
UPS/USPS-T1-1e redirected to USPS	NAA, UPS
UPS/USPS-T6-7 redirected to USPS	PSA
UPS/USPS-T11-7 redirected to USPS	UPS
UPS/USPS-T11-10 redirected to USPS	UPS
UPS/USPS-T13-1 redirected to USPS	UPS
UPS/USPS-T13-2 redirected to USPS	UPS
UPS/USPS-T14-6a redirected to USPS	UPS



Interrogatory

VP/USPS-7  
 VP/USPS-8  
 VP/USPS-9  
 VP/USPS-10  
 VP/USPS-11  
 VP/USPS-12  
 VP/USPS-13  
 VP/USPS-14  
 VP/USPS-T1-3 redirected to USPS  
 VP/USPS-T5-4 redirected to USPS  
 VP/USPS-T5-5 redirected to USPS  
 VP/USPS-T5-6 redirected to USPS  
 VP/USPS-T5-7b redirected to USPS  
 VP/USPS-T5-8e redirected to USPS  
 VP/USPS-T5-9d redirected to USPS  
 VP/USPS-T5-10b redirected to USPS  
 VP/USPS-T5-10c redirected to USPS  
 VP/USPS-T5-10d redirected to USPS  
 VP/USPS-T5-11 redirected to USPS  
 VP/USPS-T5-12 redirected to USPS  
 VP/USPS-T5-14a redirected to USPS  
 VP/USPS-T5-15 redirected to USPS  
 VP/USPS-T5-16 redirected to USPS  
 VP/USPS-T31-42a redirected to USPS  
 VP/USPS-T31-42c redirected to USPS  
 VP/USPS-T39-4 redirected to USPS  
 VP/USPS-T39-5 redirected to USPS  
 VP/USPS-T39-6 redirected to USPS  
 VP/USPS-T39-7 redirected to USPS  
 VP/USPS-T39-8 redirected to USPS  
 VP/USPS-T39-9 redirected to USPS  
 VP/USPS-T39-10 redirected to USPS  
 VP/USPS-T39-11 redirected to USPS  
 VP/USPS-T39-12 redirected to USPS  
 VP/USPS-T39-13 redirected to USPS  
 VP/USPS-T39-14 redirected to USPS  
 VP/USPS-T39-16 redirected to USPS  
 VP/USPS-T39-17 redirected to USPS  
 VP/USPS-T39-23 redirected to USPS  
 VP/USPS-T39-24 redirected to USPS  
 VP/USPS-T39-26 redirected to USPS

Designating Parties

Val-Pak  
 Val-Pak  
 NAA, OCA, Val-Pak  
 NAA, OCA, Val-Pak  
 NAA, OCA, Val-Pak  
 NAA, Val-Pak  
 OCA, Val-Pak  
 Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 Val-Pak  
 Val-Pak  
 Val-Pak  
 Val-Pak  
 Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 Val-Pak  
 NAA, Val-Pak  
 Val-Pak  
 Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak

Interrogatory

VP/USPS-T39-27 redirected to USPS  
 VP/USPS-T39-28 redirected to USPS  
 VP/USPS-T39-29 redirected to USPS  
 VP/USPS-T39-30 redirected to USPS  
 VP/USPS-T39-32 redirected to USPS  
 VP/USPS-T39-33 redirected to USPS  
 VP/USPS-T39-34 redirected to USPS  
 VP/USPS-T39-35 redirected to USPS  
 VP/USPS-T39-36 redirected to USPS  
 VP/USPS-T39-37 redirected to USPS  
 VP/USPS-T39-39 redirected to USPS  
 VP/USPS-T39-40 redirected to USPS  
 VP/USPS-T39-41 redirected to USPS  
 VP/USPS-T39-42 redirected to USPS  
 VP/USPS-T39-43 redirected to USPS  
 VP/USPS-T39-44 redirected to USPS  
 VP/USPS-T39-45 redirected to USPS  
 VP/USPS-T39-54 redirected to USPS  
 VP/USPS-T39-55 redirected to USPS  
 VP/USPS-T39-56 redirected to USPS  
 VP/USPS-T39-57 redirected to USPS  
 VP/USPS-T39-58 redirected to USPS  
 VP/USPS-T39-59 redirected to USPS  
 VP/USPS-T39-60 redirected to USPS  
 VP/USPS-T39-61 redirected to USPS  
 VP/USPS-T39-62 redirected to USPS  
 VP/USPS-T39-64 redirected to USPS  
 VP/USPS-T39-65 redirected to USPS  
 VP/USPS-T39-66 redirected to USPS  
 VP/USPS-T39-67 redirected to USPS  
 VP/USPS-T39-68 redirected to USPS  
 VP/USPS-T43-14a redirected to USPS  
 VP/USPS-T43-14b redirected to USPS  
 VP/USPS-T43-14c redirected to USPS  
 VP/USPS-T43-18 redirected to USPS  
 VP/USPS-T43-25 redirected to USPS  
 POIR No. 2, Questions 5, 12  
 POIR No. 4, Questions 8, 9a  
 POIR No. 6, Question 4  
 POIR No. 7, Questions 7 and 9

Designating Parties

Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, Val-Pak  
 NAA, Val-Pak  
 Advo, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 Advo, NAA, Val-Pak  
 NAA, Val-Pak  
 Advo, Val-Pak  
 Advo, Val-Pak  
 Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 NAA, Val-Pak  
 Val-Pak  
 NAA, Val-Pak  
 PRC  
 PRC  
 UPS  
 UPS

Supplemented 12/14/01

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-52.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of the quality of Postal Service products and services. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

The surveys responsive to this question are Customer Satisfaction Measurement (CSM) Residential survey, the CSM Small/Large Business (CSM-Business) survey, the CSM National Account survey and the CSM Premier Account survey.

The Postal Service is providing the data for the years FY 94, 97, 00, and 01 in USPS-LR-J-197, as directed in P.O. Rulings R2001-1/7 and 17, and pursuant to protective conditions. See P.O. Rulings 2 and 17. Only the data for FY2001 can be provided annually. The rest of the data are being provided quarterly, which is how the Postal Service received the data until FY2001.

The CSM-Residential survey referenced in P.O. Ruling 17, (footnote 11) is the survey that was used only in FY2001. The questions in the CSM Residential surveys for FY1994, 97 and 00 were different in many respects from the FY2001 survey.

The CSM-Business survey, the National Account survey, and the Premier Account survey referenced in P.O. Ruling 17 (footnote 11) were used in FY2000

Supplmented 12/14/01

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

and FY2001. The questions in used in FY94 and FY97 were also different in many respects from the FY2000 and FY2001 survey.

Where questions in the surveys differ from the ones selected in P.O. Rulings 7 and 17, the data provided are for those questions that most nearly approximate the selected questions. See P.O. Ruling R2001-1/17, p. 8. The difference in the questions from one year to the next may affect any conclusions about trends over time that could have been drawn from the results. As such, by providing the results that "most nearly approximate" the selected questions, Postal Service is not making any representation that the results can be compared statistically or that any conclusions about trends are necessarily valid.

The following data are unavailable: FY1994 results for CSM Business, Premier and National Accounts surveys and the FY1997 textual answers to the question about recent experiences with a serious problem.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-52.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of the quality of Postal Service products and services. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

Objection and joint motion for protective conditions filed on October 15, 2001.



Supplemented 12/14/01

**SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-53.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of consumer satisfaction with Postal Service products and services. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

See response to OCA/USPS-52. The only publicly available survey information is the American Customer Satisfaction Index (ACSI). See response to Interrogatory OCA/USPS-65, filed on October 31, 2001 for the publicly available information.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-53.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of consumer satisfaction with Postal Service products and services. Please include such materials *produced since 1990*, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include *but are not limited to* First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

Attached are two telephone forms that the Postal Service uses to survey its Premier (Attachment A) and National (Attachment B) accounts. Regarding other material that may be responsive, see objection and joint motion for protective conditions filed on October 15, 2001.

**CRT****FINANCE, USP46924  
F924****FIELD FINAL - OCTOBER 11, 1999**  
(Columns are "card/column")

AC1645

PROJECT REGISTRATION #120278

UNITED STATES POSTAL SERVICE

THE GALLUP ORGANIZATION

  X   APPROVED BY CLIENT

Premier Business Customer Study

  X   APPROVED BY PROJECT MANAGER

Max Larsen/Linda Keil/Syed Ali

Stacey Richter

Brenda Sonksen, Specwriter

October, 1999 (AP02 2000) n=1,300

I.D.#:

    0     (1-6)

AREA CODE AND TELEPHONE NUMBER:

                     ( 1/32 - 1/41)

\*\*INTERVIEW TIME:

                     ( 2/49 - 2/54)\*\*RESPONDENT: (Code from "Fone" file)                     (15/12 - 15/36)\*\*COMPANY: (Code from "Fone" file)                     (19/12 - 19/46)(CAUTION: We have ONLY ONE contact for this company)

(If no name in "Fone" file,  
Skip to "Intro #2")

INTRO #1

(If CONTACT NAME in "Fone" file, ask:) Hello, may I speak to (name from "Fone" file)? (When named respondent is reached, continue:) Hello, this is \_\_\_\_\_, from The Gallup Organization. We are conducting a survey for the U.S. Postal Service to gather information that will help them improve their service to your business.

- 1 Yes, respondent available - (Skip to S6a)
- 2 Respondent available at another phone number - (Skip to S6)
- 3 No longer works for this company/  
Responsibilities have changed/  
Someone better able to evaluate satisfaction - (Skip to S4)
- 5 Respondent unknown - (Skip to R3)
- 7 Busy/Out to lunch/Sick, etc. -  
(Set time to call back)
- 9 (Refused) - (Skip to S2) \_\_\_\_\_ ( 5/12)

INTRO #2

(If NO CONTACT NAME available, ask:) Hello, may I speak to the person who is in charge of your mailing operation? (NOTE TO INTERVIEWER: Talk to the person best able to evaluate satisfaction with USPS)

- 1 Yes, respondent available - (Skip to R2)
- 2 Respondent available at another phone number - (Skip to R4)
- 3 No such person exists - (Continue)
- 5 Don't know if there is such a person - (Continue)
- 7 Busy/Out to lunch/Sick, etc. - (Set time to call back)
- 9 (Refused) - (Thank and Terminate) \_\_\_\_\_ ( 5/12)

R1. This is \_\_\_\_\_, from The Gallup Organization. We are conducting a survey for the U.S. Postal Service to gather information that will help them improve their service to your business. Is there anyone at this location who would be able to evaluate your company's satisfaction with the Postal Service?

- 1 Yes - (Skip to R4)
- 2 No (Thank and Terminate)
- 8 (DK) (Thank and Terminate)
- 9 (Refused) (Thank and Terminate) \_\_\_\_\_ ( 5/14)

R2. (When mail operations person is reached, continue:)

Hello, this is \_\_\_\_\_, from The Gallup Organization. We are conducting a survey for the U.S. Postal Service to gather information that will help them improve their service to your business. Would you be the best person at this location to evaluate your company's satisfaction with the Postal Service?

1 Yes - (Skip to R4)

2 No - (Continue)

8 (DK) (Thank and Terminate)

9 (Refused) (Thank and Terminate)

\_\_\_\_\_ ( 5/15)

R3. Who would be the best person to evaluate the Postal Service at this location?

NAME: (Verify spelling)

\_\_\_\_\_ ( 5/16 - 5/45)

(All in R3, Skip to S5)

R4. What is (your/person's) name?

NAME: (Verify spelling)

\_\_\_\_\_ ( 5/16 - 5/45)

(If code "1" in R2, Skip to S6a;  
Otherwise, Skip to S5)

'There is no S1)

HOLD

0 ( 7/50)

S2. (INTERVIEWER CODE:) What is the reason for refusal?

- 01 Other (list)
- 02 (DK)
- 03 HOLD
- 04 HOLD
- 05 HOLD
- 06 Too busy
- 07 Respondent does not want to do this survey now or in the future
- 08 Respondent does not want to do survey this quarter; call back during another field period
- 09 No reason given/Hung up
- 10 Corporate refusal against company policy to participate

( 7/53) ( 7/54)

S2a. (INTERVIEWER CODE:) Describe what happened.

( / ) ( / )

S3. (INTERVIEWER CODE:) Who refused?

- 1 Respondent
- 2 Receptionist/Other office personnel

( 7/55)

(All in S3, Thank and Terminate)

S4. Who has taken over (his/her/your) responsibilities?

01 Name given

DK (DK) (Thank and Terminate)

RF (Refused) (Thank and Terminate)

NA (Not applicable/No one has taken these responsibilities) - (Thank and Terminate)

NAME: (Verify spelling)

( 5/16 - 5/45)

S5. Can (he/she) be reached at this telephone number?

1 Yes - (Reset to "Intro")

2 No - (Continue)

( 7/56)

S6. May I have (his/her) telephone number, please?

01 Phone number given - (Reset to "Connect")

DK (DK) - (Thank and Terminate)

RF (Refused) - (Reset to "Intro", and code as appropriate)

S6a. Just to verify I have reached the correct company, is this (name of company from "Fone" file)?

1 Yes - (Skip to S6c)

2 No (Continue)

8 (DK) (Continue)

9 (Refused) (Continue)

( 8/60)



S6b. Has your company ever been called (name of company from "Fone" file)?

- 1 Yes - (Skip to #S6c)
- 2 No (Continue)
- 8 (DK) (Continue)
- 9 (Refused) (Continue) \_\_\_\_\_ ( 8/61)

S6b-1. (If code "2", "8" or "9" in S6b, ask:) Is this location part of (name of parent company from "Fone" file)?

- 1 Yes - (Continue)
- 2 No - (Thank, Terminate & Tally on QSS screen, and say, "I'm sorry, I have reached the wrong company.")
- 8 (DK) - (Thank, Terminate & Tally on QSS screen, and say, "I'm sorry, I have reached the wrong company.")
- 9 (Refused) - (Thank, Terminate & Tally on QSS screen, and say, "I'm sorry, I have reached the wrong company.") \_\_\_\_\_ ( 7/59)

S6c. What is your zip code?

- 1 (Enter zip code) - (Continue)
- 8 (DK) (Skip to S6e)
- 9 (Refused) (Skip to S6e) \_\_\_\_\_ ( 8/62)

(SURVENT NOTE: Display:)

"Fone" file zip code: (Code from "Fone" file)  
 Zip code given by respondent: (Code from S6c)

S6d. (INTERVIEWER CODE:) (on same screen with Survent display)

- 1 Yes, first three digits of both zip codes are the same
- 2 No, first three digits of both zip codes are not the same

\_\_\_\_\_ ( 8/63)

(If code "1" in S6d,  
Skip to "Interviewer Read" before S7)

S6e. (If code "8" or "9" in S6c or code "2" in S6d,  
ask:) Is this company located in (city and state  
from "Fone" file)?

- 1 Yes - (Skip to "Interviewer Read" before S7)
- 2 No - (Thank, Terminate and Tally on QSS screen, and Continue with "Interviewer Read")
- 8 (DK) - (Thank, Terminate and Tally on QSS screen, and Continue with "Interviewer Read")
- 9 (Refused) - (Thank, Terminate and Tally on QSS screen, and Continue with "Interviewer Read")

\_\_\_\_\_ ( 8/64)

(If code "2", "8" or "9" in S6e,  
INTERVIEWER READ:) I'm sorry, I have reached the wrong location. - (Terminate)

**(INTERVIEWER READ:)** This survey covers all types of mail your company sends and receives. Gallup will prepare reports for the Postal Service that show group totals from all survey respondents. Your individual answers will be kept strictly confidential.

S7. Does your company have mailing operations in more than one location?

1 Yes (Continue)

2 No - (Skip to #1)

8 (DK) (Thank and Terminate)

9 (Refused) (Thank and Terminate)

\_\_\_\_\_ ( 8/52)

S8. Are you able to evaluate your company's satisfaction with the U.S. Postal Service in (read 1-3)?

1 This location only (Continue)

2 This location and some other  
company locations, OR (Continue)

3 All company locations (Continue)

8 (DK) (Thank and Terminate)

9 (Refused) (Thank and Terminate)

\_\_\_\_\_ ( 5/53)

1. Thinking about the service your business received from the U.S. Postal Service in the PAST THIRTY DAYS, how would you rate the U.S. Postal Service on (read and rotate A-O)? Would you say (read 5-1)?

5    Excellent  
 4    Very good  
 3    Good  
 2    Fair, OR  
 1    Poor

7    (Not applicable)  
 8    (DK)  
 9    (Refused)

- |  |               |
|--|---------------|
| A. Providing products and services to meet the needs of your business                          | _____ ( 9/12) |
| B. Providing products and services that are a good value for the price                         | _____ ( 9/13) |
| C. Having rules and regulations that are easy to understand                                    | _____ ( 9/14) |
| D. Keeping you informed of changes in rules and regulations                                    | _____ ( 9/15) |
| E. The consistency of interpretation of rules and regulations by U.S. Postal Service employees | _____ ( 9/16) |
| F. The amount and complexity of paperwork  | _____ ( 9/17) |
| G. Having employees who are responsive   | _____ ( 9/18) |
| H. Having courteous and friendly employees   | _____ ( 9/19) |
| I. Having employees who go out of their way to meet your mailing needs                         | _____ ( 9/20) |
| J. Having employees who are knowledgeable about U.S. Postal Service products and services      | _____ ( 9/21) |

## 1. (Continued:)

- K. The length of time it usually takes for a First-Class letter mailed in your local area to be delivered in your local area \_\_\_\_\_ ( 9/22)
- L. The length of time it usually takes for a First-Class letter mailed in your local area to be delivered in other parts of the country \_\_\_\_\_ ( 9/23)
- M. Delivering Standard Mail A within the expected number of days? (If asked, say:) Standard Mail A is advertising mail \_\_\_\_\_ ( 9/24)
- N. Delivery of mail in good condition \_\_\_\_\_ ( 9/25)
- O. The security of First-Class mail, that your mail will remain unopened and safe from theft and loss \_\_\_\_\_ (11/12)

'There is no #2)

HOLD

\_\_\_\_\_ 0 ( 9/27-  
9/28)

3. During the PAST THIRTY DAYS, have you experienced errors by the U.S. Postal Service in processing money in your postage accounts? Would you say this has happened (read 1-4)?

- 1 Never
- 2 Once a week or less
- 3 Two to three times a week, OR
- 4 Nearly every day
- 7 (Not applicable)
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 9/29)

4. Does your business use a U.S. Postal Service Post Office box for receiving mail?

1 Yes  
2 No  
8 (DK)  
9 (Refused)

\_\_\_\_\_ ( 9/30)

5. For mail received at your company location, how would you rate the U.S. Postal Service on delivering mail to the correct address? Would you say it is (read 5-1)? (If code "1" in #4, say:) Please consider mail delivered to your street address and your Post Office box.

5 Excellent  
4 Very good  
3 Good  
2 Fair, OR  
1 Poor  
  
7 (Not applicable)  
8 (DK)  
9 (Refused)

\_\_\_\_\_ ( 9/31)

6. In the PAST THIRTY DAYS, have you received mail intended for a different address? (If code "1" in #4, say:) Please consider mail delivered to your street address and your Post Office box.

1 Yes - (Continue)  
  
2 No (Skip to #9)  
8 (DK) (Skip to #9)  
9 (Refused) (Skip to #9)

\_\_\_\_\_ ( 9/32)

7. (If code "1" in #6, ask:) How often has this occurred in the PAST THIRTY DAYS? Would you say (read 2-4)?

1 (Not at all)  
 2 Once  
 3 Two or three times, OR  
 4 More than three times

8 (DK)  
 9 (Refused)

\_\_\_\_\_ ( 9/33)

8. When mail was misdelivered to this company location in the PAST THIRTY DAYS, how much mail was delivered incorrectly to your address? Would you say (read 1-4)?

1 One tray or less per day  
 2 Two to five trays per day  
 3 Six to ten trays per day, OR  
 4 More than ten trays per day

8 (DK)  
 9 (Refused)

\_\_\_\_\_ ( 9/34)

9. Which of the following best describes how mail is delivered to this company location? Is it (read 1-3)? (ENTER ALL RESPONSES)

1 Delivered by the U.S. Postal Service  
 2 Picked up by one of your company's employees, OR  
 3 Delivered by a courier service you pay to pick up your mail and deliver it to your location

8 (DK)  
 9 (Refused)

\_\_\_\_\_ ( 9/35)

(If code "2" or "3" in #9, Continue;  
Otherwise, Skip to "Note" before #10)

9a. Does your company use Caller Service or Firm Holdout Service?

1 Yes, Caller Service (Continue)

2 Yes, Firm Holdout Service (Continue)

3 (Both) (Continue)

4 Neither - (Skip to #9c)

8 (DK) (Continue)

9 (Refused) (Continue)

(12/12)

9b. (If code "1", "2", "3", "8" or "9" in #9a, ask:)

How many times a day does your company usually pick up your mail at the Post Office (includes pick up by courier or company employees)? (Open ended and code actual number)

98 (DK)

99 (Refused)

(12/13) (12/14)

9c. In the PAST THIRTY DAYS, how would you rate the U.S. Postal Service on consistency of having the mail available for pick up at the same time each day? Would you say it is (read 5-1)?

5 Excellent

4 Very good

3 Good

2 Fair

1 Poor

8 (DK)

9 (Refused)

( 9/37)



(If code "1" in #9, Continue;  
Otherwise, Skip to #12)

10. Thinking about mail delivered to this company location by a U.S. Postal Service carrier during the PAST THIRTY DAYS, how would you rate the U.S. Postal Service on (read and rotate A-B)? Would you say it is (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair  
 1     Poor

8     (DK)  
 9     (Refused)

A. Time of day mail is delivered to your location \_\_\_\_\_ (11/20)

B. Consistency of delivering mail to your location within a half hour of the same time each day \_\_\_\_\_ (11/21)

- 10a. During the PAST THIRTY DAYS, did you typically receive your mail at this location (read 1-2)?

1     Before noon, OR  
 2     After noon  
 3     (Both/More than one delivery)

8     (DK)  
 9     (Refused) \_\_\_\_\_ (11/22)

(There is no #11)

12. During the PAST THIRTY DAYS, has your business made substantial use of the following USPS products and services, either directly or through a vendor? How about (read and rotate A-H, then I)? (NOTE: If respondent says "very little" or "not much", code as "2")

- 1 Yes  
2 No  
8 (DK)  
9 (Refused)

- |   |               |
|---|---------------|
| A. Express Mail   | _____ ( 9/38) |
| B. Priority Mail  | _____ ( 9/39) |
| C. Full-Rate, First-Class Mail                                      | _____ ( 9/40) |
| D. Discounted First-Class Mail (presorted, bar-coded)               | _____ ( 9/41) |
| E. Periodicals (e.g., magazines, newspapers; formerly second-class) | _____ ( 9/42) |
| F. Standard Mail A (e.g., advertising; formerly third-class)        | _____ ( 9/43) |
| G. Standard Mail B (e.g., parcels; formerly fourth-class)           | _____ ( 9/44) |
| H. International  | _____ ( 9/45) |
| I. Some other product or service                                    | _____ ( 9/79) |

12. (Continued:)

II. (If code "1" in #12-I, ask:) What product or service? (Open ended) (Allow three responses)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 No/No other product or service
- 05 HOLD

_____	1st Resp:	( 9/46)	( 9/47)
_____	2nd Resp:	( 9/75)	( 9/76)
_____	3rd Resp:	( 9/77)	( 9/78)

(If code "2", "8" or "9" to ALL  
in #12 A-H, and code "02", "03" or "04"  
in #12-II, Skip to #16;  
Otherwise, Continue)

13. (For each code "1" in #12 A-H, and "Specific"  
response in #12-II, ask:) Based on your company's  
 experience in the PAST THIRTY DAYS, how would you  
 rate the performance of (read and rotate A-I3, as  
appropriate)? Would you say (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair, OR  
 1     Poor

8     (DK)  
 9     (Refused)

A.    Express Mail	_____	( 9/48)
B.    Priority Mail	_____	( 9/49)
C.    Full-Rate, First-Class Mail	_____	( 9/50)
D.    Discounted First-Class Mail (presorted, bar-coded)	_____	( 9/51)
E.    Periodicals (e.g., magazines, newspapers; formerly second-class)	_____	( 9/52)
F.    Standard Mail A (e.g., advertising; formerly third-class)	_____	( 9/53)
G.    Standard Mail B (e.g., parcels; formerly fourth-class)	_____	( 9/54)
H.    International	_____	( 9/55)
I1.   ("1st Specific" response in #12-II)	_____	( 9/56)
I2.   ("2nd Specific" response in #12-II)	_____	(10/70)
I3.   ("3rd Specific" response in #12-II)	_____	(10/71)

14. (For each code "1" in #12 A-H, or "Specific" response in #12-II, ask:) In the next twelve months, do you intend to use (read and rotate A-I3, as appropriate) (read 3-1)?

- 3 More than in the past twelve months
- 2 About the same as in the past twelve months, OR
- 1 Less than in the past twelve months

- 8 (DK)
- 9 (Refused)

- |   |               |
|---|---------------|
| A. Express Mail   | _____ ( 9/57) |
| B. Priority Mail  | _____ ( 9/58) |
| C. Full-Rate, First-Class Mail                                      | _____ ( 9/59) |
| D. Discounted First-Class Mail (presorted, bar-coded)               | _____ ( 9/60) |
| E. Periodicals (e.g., magazines, newspapers; formerly second-class) | _____ ( 9/61) |
| F. Standard Mail A (e.g., advertising; formerly third-class)        | _____ ( 9/62) |
| G. Standard Mail B (e.g., parcels; formerly fourth-class)           | _____ ( 9/63) |
| H. International  | _____ ( 9/64) |
| I1. ("1st Specific" response in #12-II)                             | _____ ( 9/65) |
| I2. ("2nd Specific" response in #12-II)                             | _____ (10/72) |
| I3. ("3rd Specific" response in #12-II)                             | _____ (10/73) |

15. (For each code "1" in #12 A-H, or "Specific" response in #12-II, ask:) Would you recommend (read and rotate A-I3, as appropriate) to your business associates?

1 Yes  
2 No  
8 (DK)  
9 (Refused)

A. Express Mail \_\_\_\_\_ ( 9/66)

B. Priority Mail \_\_\_\_\_ ( 9/67)

(There are no C-E) HOLD 0 ( 9/68-9/70)

F. Standard Mail A (e.g., advertising; formerly third-class) \_\_\_\_\_ ( 9/71)

G. Standard Mail B (e.g., parcels; formerly fourth-class) \_\_\_\_\_ ( 9/72)

H. International \_\_\_\_\_ ( 9/73)

(There is no I1) HOLD 0 ( 9/74)

(There are no I2-I3) HOLD 0 (10/74-10/75)

16. Does the U.S. Postal Service pick up mail at your business location?

1 Yes - (Continue)

2 No (Skip to #19)

8 (DK) (Skip to #19)

9 (Refused) (Skip to #19) \_\_\_\_\_ (10/12)

17. (If code "1" in #16, ask:) Thinking about your experiences in the LAST THIRTY DAYS, how would you rate the U.S. Postal Service on convenience of mail pick up times by the USPS from your business location? Would you say it is (read 5-1)?

5     Excellent  
4     Very good  
3     Good  
2     Fair  
1     Poor

8     (DK)  
9     (Refused)

\_\_\_\_\_ (10/13)

18. How would you rate the U.S. Postal Service on reliability of mail pick up times? Would you say it is (read 5-1)?

5     Excellent  
4     Very good  
3     Good  
2     Fair  
1     Poor

8     (DK)  
9     (Refused)

\_\_\_\_\_ (10/14)

- 18a. How would you rate the U.S. Postal Service on the number of pick up times? Would you say it is (read 5-1)?

5     Excellent  
4     Very good  
3     Good  
2     Fair, OR  
1     Poor

8     (DK)  
9     (Refused)

\_\_\_\_\_ (11/13)

19. Thinking about the equipment or supplies (trays, sacks) the U.S. Postal Service provided you in the LAST THIRTY DAYS, how would you rate the U.S. Postal Service on (read A-C)? Would you say (read 5-1)?

- 5     Excellent
- 4     Very good
- 3     Good
- 2     Fair, OR
- 1     Poor
  
- 7     (Not applicable)
- 8     (DK)
- 9     (Refused)

- A.    Knowledge or understanding of your equipment needs \_\_\_\_\_ (10/15)
- B.    Providing you with the equipment and supplies you need for preparing mailings \_\_\_\_\_ (10/16)
- C.    Maintaining Postal Service equipment in good working order \_\_\_\_\_ (10/17)

20. In the PAST THIRTY DAYS, how often have you had difficulty obtaining equipment or supplies (trays, sacks) you need for this business location? Would you say (read 1-4)?

- 1     Not at all
- 2     Once
- 3     Two or three times, OR
- 4     More than three times
  
- 7     (Not applicable)
- 8     (DK)
- 9     (Refused)

\_\_\_\_\_ (10/18)



1. How would you rate the U.S. Postal Service on the ease of contacting someone who can answer your questions? Would you say (read 5-1)?

5     Excellent  
4     Very good  
3     Good  
2     Fair, OR  
1     Poor

7     (Not applicable)  
8     (DK)  
9     (Refused)

\_\_\_\_\_ (10/19)

22. Do you have regular contact with one main person at the U.S. Postal Service?

1     Yes - (Continue)

2     No                                (Skip to #26)  
8     (DK)                              (Skip to #26)  
9     (Refused)                        (Skip to #26)

\_\_\_\_\_ (10/20)

23. (If code "1" in #22, ask:) What is the job title of your main contact? (Open ended and code) (If necessary, read 06-16)

- ```

01 Other (list)
02 (DK)
03 (Refused)
04 HOLD
05 HOLD
06 National Account Manager
07 Account Representative
08 Facility Manager
09 Postmaster
10 Customer Service Representative
11 Business Mail Entry Unit Supervisor
12 Business Service Network Representative
13 Business Mail Acceptance Clerk
14 Postal Carrier
15 Post Office Window Clerk
16 Sales specialist

```

(10/21)      (10/22)

(All in #23, Skip to #26a)

(There are no #24 and #25) HOLD      0 (10/23-  
10/28)

(There is no #25a) HOLD 0 (11/14)

26. How many different U.S. Postal Service employees are you in regular contact with? (Open ended and code)

- 1 None
- 2 Two
- 3 Three
- 4 Four
- 5 Five or more

8 (DK)

9 (Refused)

\_\_\_\_\_ (10/29)

26a. Have you been in contact with your Account Representative in the PAST THIRTY DAYS?

1 Yes - (Continue)

2 No (Skip to #27a)

3 (DK) (Skip to #27a)

4 (Refused) (Skip to #27a)

\_\_\_\_\_ (11/30)

26b. How would you rate your Account Representative on  
(read and rotate A-F)?

- 5    Excellent
- 4    Very good
- 3    Good
- 2    Fair
- 1    Poor

- 8    (DK)
- 9    (Refused)

- A.    Understanding the mailing needs of your business \_\_\_\_\_ (11/31)
- B.    Working to find solutions to your mailing problems \_\_\_\_\_ (11/32)
- C.    Communicating to you changes in USPS rules, regulations, products or services relevant to your needs \_\_\_\_\_ (11/33)
- D.    Bringing you new ideas about how to handle your mailing needs \_\_\_\_\_ (11/34)
- E.    Speed of responding to your phone calls \_\_\_\_\_ (11/35)
- F.    Treating you like a valued customer \_\_\_\_\_ (11/36)

26c. In the past thirty days, how long did it take, on average, to get in touch with your account representative? Was it (read 1-4)?

- 1 Less than two hours
- 2 Between two and four hours
- 3 Between four and eight hours, OR
- 4 Eight hours or more
- 7 (No contact in the past thirty days)
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 7/57)

26d. How would you rate the overall service provided by your account representative? Would you say (5-1)?

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair, OR
- 1 Poor
- 6 (DK)
- 7 (Refused)

\_\_\_\_\_ ( 7/58)

(There is no #27)

HOLD

\_\_\_\_\_ 0 (10/30-  
10/31)

7a. Have you been in contact with your Business Service Network Representative in the PAST THIRTY DAYS? [(If necessary, say:) The Business Service Network is a system started by the U.S. Postal Service to get you information and solutions to problems by providing a single point-of-contact.] (NOTE TO INTERVIEWER: Customer Service Representative is the same as Business Service Network Representative)

1 Yes - (Continue)

2 No (Skip to #28)

3 (Not familiar with BSN) (Skip to #28)

4 (Respondent calls his/her National Account Manager for service problems (Skip to #28)

8 (DK) (Skip to #28)

9 (Refused) (Skip to #28)

(12/17)

7b. (If code "1" in #27a, ask:) How would you rate your Business Service Network Representative on (read and rotate A-G)? Would you say (read 5-1)? (NOTE TO INTERVIEWER: Customer Service Representative is the same as Business Service Network Representative)

5 Excellent

4 Very good

3 Good

2 Fair, OR

1 Poor

8 (DK)

9 (Refused)

## 27b. (Continued:)

- |    |                                         |       |         |
|----|-----------------------------------------|-------|---------|
| A. | Speed of responding to your phone calls | _____ | (12/18) |
| B. | Treating you like a valued customer     | _____ | (12/19) |
| C. | Professionalism                         | _____ | (12/20) |
| D. | Follow through on promised action(s)    | _____ | (12/21) |
| E. | Accuracy of information                 | _____ | (12/22) |
| F. | Clarity of explanation                  | _____ | (12/23) |
| G. | Helpfulness                             | _____ | (12/24) |

27c. During the PAST THIRTY DAYS, do you feel the length of time it took to answer your questions or resolve your problems was (read 1-3)?

- |   |                                           |               |
|---|-------------------------------------------|---------------|
| 1 | Less time than you expected               |               |
| 2 | About the amount of time you expected, OR |               |
| 3 | More time than you expected               |               |
| 8 | (DK)                                      |               |
| 9 | (Refused)                                 | _____ (12/25) |

27d. How would you rate the overall service provided by your Business Service Network Representative during the PAST THIRTY DAYS? Would you say (read 5-1)?

(NOTE TO INTERVIEWER: Customer Service Representative is the same as Business Service Network Representative)

- |   |           |               |
|---|-----------|---------------|
| 5 | Excellent |               |
| 4 | Very good |               |
| 3 | Good      |               |
| 2 | Fair, OR  |               |
| 1 | Poor      |               |
| 8 | (DK)      |               |
| 9 | (Refused) | _____ (12/26) |

HOLD            0        (10/32-  
                        10/41)

28. Now, I am going to ask you about overall performance. Thinking about all aspects of U.S. Postal Service performance during the PAST THIRTY DAYS, how would you rate the service your business has received? Would you say (read 5-1)?

- |   |           |
|---|-----------|
| 5 | Excellent |
| 4 | Very good |
| 3 | Good      |
| 2 | Fair, OR  |
| 1 | Poor      |

- 8 (DK)  
9 (Refused) (10/42)

(There are no #29 and #30)

HOLD           0       (10/43-  
                        10/47)

1. During the PAST THIRTY DAYS, have you experienced serious problems with U.S. Postal Service products or services? Would you say (read 1-4)?

- ```

1   Not at all - (Skip to #33)
2   Once (Continue)
3   Two or three times, OR (Continue)
4   More than three times (Continue)

```

- ```

8      (DK)                (Skip to #33)
9      (Refused)           (Skip to #33)                                (10/48)

```



32. (If code "2", "3" or "4" in #31, ask:) What serious problems have you had in the PAST THIRTY DAYS?  
 (Open ended) (Allow two responses)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD

1st  
 Resp: (10/49) (10/50)

2nd  
 Resp: (10/51) (10/52)

32a. Did you contact the postal service to discuss the problem? (NOTE TO INTERVIEWER: If more than one problem, as about the most recent one)

- 1 Yes - (Continue)
- 2 No (Skip to #32c)
- 3 (DK) (Skip to #32c)
- 4 (Refused) (Skip to #32c)

(11/37)

32b. (If code "1" in #32a, ask:) Who did you contact?  
(Open ended and code)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
  
- 06 National Account Manager
- 07 Account Representative
- 08 Facility Manager
- 09 Postmaster
- 10 Customer Service Representative
- 11 Business Mail Entry Unit Supervisor
- 12 Business Service Network Representative
- 13 Business Mail Acceptance Clerk
- 14 Postal Carrier
- 15 Post Office Window Clerk

\_\_\_\_\_  
(11/38) (11/39)

(If code "2", "3" or "4" in #31, Continue;  
Otherwise, Skip to #33)

32c. Would you like me to pass along what you have just told me to the Postal Service and have a Postal representative call you about these problems?

- 1 Yes
- 2 No
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_  
(10/76)

33. Do you prepare or send mail for other companies?

- 1 Yes
- 2 No
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_  
(10/53)

34. Do you use a vendor to prepare or send mail for your company?

1 Yes - (Continue)

2 No (Skip to #36)

8 (DK) (Skip to #36)

9 (Refused) (Skip to #36)

\_\_\_\_\_ (10/54)

35. (If code "1" in #34, ask:) What percentage of your mail is prepared and/or sent by vendors? Is it (read 1-4)?

1 0% to 25%

2 26% to 50%

3 51% to 75%, OR

4 76% to 100%

8 (DK)

9 (Refused)

\_\_\_\_\_ (10/55)

6. In which of the following areas do you work? Is it (read 06-10, then 01)?

01 OR, some other area (list)

02 (DK)

03 (Refused)

04 HOLD

05 HOLD

06 Logistics

07 Mailroom

08 Financial operations

09 General office administration

10 Sales and marketing

\_\_\_\_\_ (10/56) \_\_\_\_\_ (10/57)

37. What is your job title? (Open ended and code)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
  
- 06 Corporate officer/Owner
- 07 Mail operations
- 08 Financial operations
- 09 Administrative/Clerical

\_\_\_\_\_  
(10/58) (10/59)

38. Please estimate your company's yearly expenditures at this location on U.S. Postal Service products and services? (Open ended and code actual amount)  
(NOTE TO INTERVIEWER: Enter ALL zeros; for example, "100 thousand" - enter "100000")

- DK (DK)
- RF (Refused)

\_\_\_\_\_  
(10/60 - 10/68)

(There is no #39)

HOLD

\_\_\_\_\_  
0 (10/76)

(NOTE TO SURVENT: Display:)

FONE FILE NAME:      (Code from "Fone" file)

(15/12 - 15/36)

NEW RESPONDENT NAME:      (Code from S4, R3 or R4,  
as appropriate)

( 5/16 - 5/45)

40. (INTERVIEWER CODE:) Who are you talking to?

- 1      "Fone" file name
- 2      New respondent

(11/72)

41. In case your name is drawn in the future, let me verify that your name, company name and address are (read information from "Fone" file/S4)? (ENTER ALL THAT ARE INCORRECT)

NAME:        [(If code "1" in #40, display from "Fone" file)/(if code "2" in #40, display from S4, R3 or R4, as appropriate)]

COMPANY NAME:    (Display from "Fone" file)

ADDRESS:        (Display from "Fone" file)

CITY:            (Display from "Fone" file)

STATE:           (Display from "Fone" file)

ZIP CODE:        (Display from "Fone" file)

PHONE NUMBER:   (Display from "Fone" file)

- 1     Information is all correct
- 2     Name is incorrect
- 3     Company name is incorrect
- 4     Address is incorrect
- 5     City is incorrect
- 6     State is incorrect
- 7     Zip code is incorrect
- 8     Phone number is incorrect

\_\_\_\_\_ (11/73)

(INTERVIEWER READ:) Those are all the questions I have for you. I really appreciate your taking the time to talk with me. This is an ongoing survey, so I may call you again in about six months.

(VALIDATE PHONE NUMBER AND THANK RESPONDENT)

42. COMMENTS: (INTERVIEWER - Enter any observations)

\_\_\_\_\_  
(11/74) (11/75)

INTERVIEWER I.D.# \_\_\_\_\_ ( 2/41-  
2/44)

vkt\larsen\usps-premier business customer-ap02 2000-910

## CRT

FINANCE, USP46923  
F923

FIELD FINAL - OCTOBER 11, 1999  
(Columns are "card/column")

AC1647  
PROJECT REGISTRATION #120279  
**UNITED STATES POSTAL SERVICE**

THE GALLUP ORGANIZATION

X APPROVED BY CLIENT

Business Customer Satisfaction  
Index National Accounts Study

X APPROVED BY PROJECT MANAGER

Max Larsen/Linda Keil/Syed Ali

Stacey Richter

Brenda Sonksen, Specwriter

October, 1999 (AP02 2000) n=330

T.D.#:

0 (1-6)

\*AREA CODE AND TELEPHONE NUMBER:

$$(1/32 - 1/41)$$

\*\*\*INTERVIEW TIME:

$$(2/49 - 2/54)$$

(CAUTION: We have ONLY ONE OR TWO contacts for this company)



(If no name in "Fone" file,  
Skip to "Intro #2")

INTRO-#1

(If CONTACT NAME in "Fone" file, ask:) Hello, may I speak to (name from "Fone" file)? (When named respondent is reached, continue:) Hello, this is \_\_\_\_\_, from The Gallup Organization. We are conducting a survey for the U.S. Postal Service to gather information that will help them improve their service to your business.

- 1 Yes, respondent available - (Skip to S6a)
- 2 Respondent available at another phone number - (Skip to S6)
- 3 No longer works for this company/  
Responsibilities have changed/  
Someone better able to evaluate  
satisfaction - (Skip to S4)
- 5 Respondent unknown (Skip to R3)
- 7 Busy/Out to lunch/Sick, etc. -  
(Set time to call back)
- 8 (Soft refused)
- 9 (Hard refused) - (Skip to S2 on  
"hard" or "2nd")

\_\_\_\_\_ ( 5/12)

---

INTRO #2

(If NO CONTACT NAME available, ask:) Hello, may I speak to the person who is in charge of your mailing operation? (NOTE TO INTERVIEWER: Talk to the person best able to evaluate satisfaction with USPS)

- 1 Yes, respondent available - (Skip to R2)
  - 2 Respondent available at another phone number - (Skip to R4)
  - 3 No such person exists - (Continue)
  - 5 Don't know if there is such a person - (Continue)
  - 7 Busy/Out to lunch/Sick, etc. - (Set time to call back)
  - 8 (Soft refused)
  - 9 (Hard refused) - (Skip to S2 on "hard" or "2nd") \_\_\_\_\_ ( 5/12)
- 

R1. This is \_\_\_\_\_, from The Gallup Organization. We are conducting a survey for the U.S. Postal Service to gather information that will help them improve their service to your business. Is there anyone at this location who would be able to evaluate your company's satisfaction with the Postal Service?

- 1 Yes - (Skip to R4)
- 2 No (Thank and Terminate)
- 8 (DK) (Thank and Terminate)
- 9 (Refused) (Thank and Terminate) \_\_\_\_\_ ( 5/14)

R2. (When mail operations person is reached, continue:)

Hello, this is \_\_\_\_\_, from The Gallup Organization. We are conducting a survey for the U.S. Postal Service to gather information that will help them improve their service to your business. Would you be the best person at this location to evaluate your company's satisfaction with the Postal Service?

1 Yes - (Skip to R4)

2 No - (Continue)

8 (DK) (Thank and Terminate)

9 (Refused) (Thank and Terminate)

\_\_\_\_\_ ( 5/15)

R3. Who would be the best person to evaluate the Postal Service at this location?

NAME: (Verify spelling)

\_\_\_\_\_ ( 5/16 - 5/45)

(All in R3, Skip to S5)

R4. What is (your/person's) name?

NAME: (Verify spelling)

\_\_\_\_\_ ( 5/16 - 5/45)

(If code "1" in R2, Skip to S6a;  
Otherwise, Skip to S5)

(There is no S1)

HOLD

0 ( 7/52)

S2. (INTERVIEWER CODE:) What is the reason for refusal?

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
- 06 Too busy
- 07 Respondent does not want to do this survey now or in the future
- 08 Respondent does not want to do survey this quarter; call back during another field period
- 09 No reason given/Hung up
- 10 Corporate refusal against company policy to participate

( 7/53) ( 7/54)

S3. (INTERVIEWER CODE:) Who refused?

- 1 Respondent
- 2 Receptionist/Other office personnel

( 7/55)

(All in S3, Thank and Terminate)

4. Who has taken over (his/her/your) responsibilities?

- 01 Name given
- 02 (DK) - (Thank and Terminate)
- 03 (Refused)
- 04 (Not applicable/No one has taken these responsibilities) - (Thank and Terminate)

NAME: (Verify spelling)

\_\_\_\_\_ ( 5/16 - 5/45)

S5. Can (he/she) be reached at this telephone number?

- 1 Yes - (Reset to "Intro")
- 2 No - (Continue)

\_\_\_\_\_ ( 7/56)

. May I have (his/her) telephone number, please?

- 01 Yes, phone number given -  
(Reset to "Connect")
- 02 (DK) - (Thank and Terminate)
- 03 (Refused) - (Reset to "Intro", and  
code as appropriate)

(INTERVIEWER READ:) Just to verify I have reached the  
correct company:

S6a. Is this (name of company from "Fone" file)?

- 1 Yes - (Skip to S6c)
- 2 No (Continue)
- 3 (DK) (Continue)
- 4 (Refused) (Continue)

\_\_\_\_\_ ( / )

S6b. (If code "2", "8" or "9" in S6a, ask:) Is this location part of (name of parent company from "Fone" file)?

- 1 Yes - (Continue)
- 2 No - (Thank, Terminate and Tally on QSS screen, then say, "I'm sorry, I have reached the wrong company")
- 8 (DK) - (Thank, Terminate and Tally on QSS screen, then say, "I'm sorry, I have reached the wrong company")
- 9 (Refused) - (Thank, Terminate and Tally on QSS screen, then say, "I'm sorry, I have reached the wrong company")

\_\_\_\_\_ ( 8/61)

S6c. What is your zip code?

- 1 (Enter zip code) - (Continue)
- 8 (DK) (Skip to S6e)
- 9 (Refused) (Skip to S6e)

\_\_\_\_\_ ( 8/62)

S6c-1. (Enter zip code)

\_\_\_\_\_ ( 8/65 - 8/69)

(SURVENT NOTE: Display:)

"Fone" file zip code: (Code from "Fone" file)  
 Zip code given by respondent: (Code from S6c)

S6d. (INTERVIEWER CODE:) (On same screen with survent display)

- 1 Yes, first 3 digits of both zip codes are the same
- 2 No, first 3 digits of both zip codes are not the same

\_\_\_\_\_ ( 8/63)

(If code "1" in S6d,  
Skip to "Interviewer Read" before S7)

S6e. (If code "8" or "9" in S6c or code "2" in S6d,  
ask:) Is this company located in (city and state  
from "Fone" file)?

- 1 Yes - (Skip to "Interviewer Read" before S7)
- 2 No (Thank, Terminate and Tally
- 8 (DK) on QSS screen and continue
- 9 (Refused) with "Read")

\_\_\_\_\_ ( 8/64)

(If code "2", "8" or "9" in S6e,  
INTERVIEWER READ:) I'm sorry, I have reached the wrong  
location.

(INTERVIEWER READ:) This survey covers all types of  
mail your company sends and  
receives. Gallup will prepare  
reports for the Postal Service that  
show group totals from all survey  
respondents. Your individual  
answers will be kept strictly  
confidential.

S7. Does your company have mailing operations in more  
than one location?

- 1 Yes (Continue)
- 2 No - (Skip to #1)
- 8 (DK) (Thank and Terminate)
- 9 (Refused) (Thank and Terminate)

\_\_\_\_\_ ( 8/52)

8. Are you able to evaluate your company's satisfaction with the U.S. Postal Service in (read 1-3)?

- 1 This location only (Continue)
- 2 This location and some other company locations, OR (Continue)
- 3 All company locations (Continue)

- 8 (DK) (Thank and Terminate)
- 9 (Refused) (Thank and Terminate)

\_\_\_\_\_ ( 5/53)

1. Thinking about the service your business received from the U.S. Postal Service in the PAST THIRTY DAYS, how would you rate the U.S. Postal Service on (read and rotate A-0)? Would you say (read 5-1)?

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair, OR
- 1 Poor
- 7 (Not applicable)
- 8 (DK)
- 9 (Refused)

- A. Providing products and services to meet the needs of your business \_\_\_\_\_ ( 9/12)
- B. Providing products and services that are a good value for the price \_\_\_\_\_ ( 9/13)
- C. Having rules and regulations that are easy to understand \_\_\_\_\_ ( 9/14)
- D. Keeping you informed of changes in rules and regulations \_\_\_\_\_ ( 9/15)
- E. The consistency of interpretation of rules and regulations by U.S. Postal Service employees \_\_\_\_\_ ( 9/16)



## 1. (Continued:)

- F. The amount and complexity of paperwork \_\_\_\_\_ ( 9/17)
- G. Having employees who are responsive \_\_\_\_\_ ( 9/18)
- H. Having courteous and friendly employees \_\_\_\_\_ ( 9/19)
- I. Having employees who go out of their way to meet your mailing needs \_\_\_\_\_ ( 9/20)
- J. Having employees who are knowledgeable about U.S. Postal Service products and services \_\_\_\_\_ ( 9/21)
- K. The length of time it usually takes for a First-Class letter mailed in your local area to be delivered in your local area \_\_\_\_\_ ( 9/22)
- L. The length of time it usually takes for a First-Class letter mailed in your local area to be delivered in other parts of the country \_\_\_\_\_ ( 9/23)
- M. Delivering Standard Mail A within the expected number of days? (If asked, say:) Standard Mail A is advertising mail \_\_\_\_\_ ( 9/24)
- N. Delivery of mail in good condition \_\_\_\_\_ ( 9/25)
- O. The security of First-Class mail, that your mail will remain unopened and safe from theft and loss \_\_\_\_\_ (11/12)

(There is no #2)

HOLD

0( 9/27-  
9/28)

3. During the PAST THIRTY DAYS, have you experienced errors by the U.S. Postal Service in processing money in your postage accounts? Would you say this has happened (read 1-4)?

- 1 Never
- 2 Once a week or less
- 3 Two to three times a week, OR
- 4 Nearly every day
- 7 (Not applicable)
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 9/29)

4. Does your business use a U.S. Postal Service Post Office box for receiving mail?

- 1 Yes
- 2 No
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 9/30)

For mail received at your company location, how would you rate the U.S. Postal Service on delivering mail to the correct address? Would you say it is (read 5-1)? (If code "1" in #4, say:)  
Please consider mail delivered to your street address and your Post Office box.

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair, OR
- 1 Poor
- 7 (Not applicable)
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 9/31)

In the PAST THIRTY DAYS, have you received mail intended for a different address? (If code "1" in #4, say:) Please consider mail delivered to your street address and your Post Office box.

1 Yes - (Continue)       

2 No (Skip to #9)

8 (DK) (Skip to #9)

9 (Refused) (Skip to #9)

       ( 9/32)

7. (If code "1" in #6, ask:) How often has this occurred in the PAST THIRTY DAYS? Would you say (read 2-4)?

1 (Not at all)

2 Once

3 Two or three times, OR

4 More than three times

8 (DK)

9 (Refused)

       ( 9/33)

8. When mail was misdelivered to this company location in the PAST THIRTY DAYS, how much mail was delivered incorrectly to your address? Would you say (read 1-4)?

1 One tray or less per day

2 Two to five trays per day

3 Six to ten trays per day, OR

4 More than ten trays per day

8 (DK)

9 (Refused)

       ( 9/34)

9. Which of the following best describes how mail is delivered to this company location? Is it (read 1-3)? (ENTER ALL RESPONSES)

- 1 Delivered by a U.S. Postal Service  
 2 Picked up by one of your company's employees, OR  
 3 Delivered by a courier service you pay to pick up your mail and deliver it to your location  
 8 (DK)  
 9 (Refused)

\*

( 9/35)

(If code "2" or "3" in #9, Continue; Otherwise, Skip to "Note" before #10)

- 9a. Does your company use Caller Service or Firm Holdout Service?

- 1 Yes, Caller Service (Continue)  
 2 Yes, Firm Holdout Service (Continue)  
 3 (Both) (Continue)  
 4 Neither - (Skip to #9c)  
 8 (DK) (Continue)  
 9 (Refused) (Continue)

(12/12)

- 9b. (If code "1", "2", "3", "8" or "9" in #9a, ask:)  
 How many times a day does your company usually pick up your mail at the Post Office (includes pick up by courier or company employees)? (Open ended and code actual number)

- 98 (DK)  
 99 (Refused)

(12/13) (12/14)

9c. In the PAST THIRTY DAYS, how would you rate the U.S. Postal Service on consistency of having the mail available for pick up at the same time each day? Would you say it is (read 5-1)?

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair
- 1 Poor

- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 9/37)

(If code "1" in #9, Continue;  
Otherwise, Skip to #12)

10. Thinking about mail delivered to this company location by a U.S. Postal Service carrier during the PAST THIRTY DAYS, how would you rate the U.S. Postal Service on (read and rotate A-B)? Would you say it is (read 5-1)?

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair
- 1 Poor

- 8 (DK)
- 9 (Refused)

A. Time of day mail is delivered to your location

\_\_\_\_\_ (11/20)

B. Consistency of delivering mail to your location within a half hour of the same time each day

\_\_\_\_\_ (11/21)

10a. During the PAST THIRTY DAYS, did you typically receive your mail at this location (read 1-2)?

- 1 Before noon, OR
- 2 After noon
- 3 (Both/More than one delivery)
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ (11/22)

(There is no #11)

12. During the PAST THIRTY DAYS, has your business made substantial use of the following USPS products and services, either directly or through a vendor? How about (read and rotate A-H, then I)? (NOTE: If respondent says "very little" or "not much", code as "2")

- 1 Yes
- 2 No
- 8 (DK)
- 9 (Refused)

- A. Express Mail \_\_\_\_\_ ( 9/38)
- B. Priority Mail \_\_\_\_\_ ( 9/39)
- C. Full-Rate, First-Class Mail \_\_\_\_\_ ( 9/40)
- D. Discounted First-Class Mail (presorted, bar-coded) \_\_\_\_\_ ( 9/41)
- E. Periodicals (e.g., magazines, newspapers; formerly second-class) \_\_\_\_\_ ( 9/42)
- F. Standard Mail A (e.g., advertising; formerly third-class) \_\_\_\_\_ ( 9/43)
- G. Standard Mail B (e.g., parcels; formerly fourth-class) \_\_\_\_\_ ( 9/44)
- H. International \_\_\_\_\_ ( 9/45)

12. (Continued:)

I. Some other product or service \_\_\_\_\_ ( 9/79)

II. (If code "1" in #12-I, ask:) What product or service? (Open ended) (Allow three responses)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 No/No other product or service
- 05 HOLD

1st  
Resp: \_\_\_\_\_ ( 9/46) \_\_\_\_\_ ( 9/47)

2nd  
Resp: \_\_\_\_\_ ( 9/75) \_\_\_\_\_ ( 9/76)

3rd  
Resp: \_\_\_\_\_ ( 9/77) \_\_\_\_\_ ( 9/78)

(If code "2", "8" or "9" to ALL  
in #12 A-H, and code "02", "03" or "04"  
in #12-II, Skip to #16;  
Otherwise, Continue)

13. (For each code "1" in #12 A-H, and "Specific" response in #12-II, ask:) Based on your company's experience in the PAST THIRTY DAYS, how would you rate the performance of (read and rotate A-I3, as appropriate)? Would you say (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair, OR  
 1     Poor

8     (DK)  
 9     (Refused)

|                                                                        |               |
|------------------------------------------------------------------------|---------------|
| A.    Express Mail                                                     | _____ ( 9/48) |
| B.    Priority Mail                                                    | _____ ( 9/49) |
| C.    Full-Rate, First-Class Mail                                      | _____ ( 9/50) |
| D.    Discounted First-Class Mail (presorted, bar-coded)               | _____ ( 9/51) |
| E.    Periodicals (e.g., magazines, newspapers; formerly second-class) | _____ ( 9/52) |
| F.    Standard Mail A (e.g., advertising; formerly third-class)        | _____ ( 9/53) |
| G.    Standard Mail B (e.g., parcels; formerly fourth-class)           | _____ ( 9/54) |
| H.    International                                                    | _____ ( 9/55) |
| I1.   ("1st Specific" response in #12-II)                              | _____ ( 9/56) |
| I2.   ("2nd Specific" response in #12-II)                              | _____ (10/70) |
| I3.   ("3rd Specific" response in #12-II)                              | _____ (10/71) |



14. (For each code "1" in #12 A-H, or "Specific" response in #12-II, ask:) In the next twelve months, do you intend to use (read and rotate A-I3, as appropriate) (read 3-1)?

- 3 More than in the past twelve months
- 2 About the same as in the past  
twelve months, OR
- 1 Less than in the past twelve months
- 8 (DK)
- 9 (Refused)

- |                                                                     |       |         |
|---------------------------------------------------------------------|-------|---------|
| A. Express Mail                                                     | _____ | ( 9/57) |
| B. Priority Mail                                                    | _____ | ( 9/58) |
| C. Full-Rate, First-Class Mail                                      | _____ | ( 9/59) |
| D. Discounted First-Class Mail (presorted, bar-coded)               | _____ | ( 9/60) |
| E. Periodicals (e.g., magazines, newspapers; formerly second-class) | _____ | ( 9/61) |
| F. Standard Mail A (e.g., advertising; formerly third-class)        | _____ | ( 9/62) |
| G. Standard Mail B (e.g., parcels; formerly fourth-class)           | _____ | ( 9/63) |
| H. International                                                    | _____ | ( 9/64) |
| I1. ("1st Specific" response in #12-II)                             | _____ | ( 9/65) |
| I2. ("2nd Specific" response in #12-II)                             | _____ | (10/72) |
| I3. ("3rd Specific" response in #12-II)                             | _____ | (10/73) |

15. (For each code "1" in #12 A, B, F, G or H, ask:)  
 Would you recommend (read and rotate A-I3, as appropriate) to your business associates?

1 Yes  
 2 No  
 8 (DK)  
 9 (Refused)

A. Express Mail \_\_\_\_\_ ( 9/66)

B. Priority Mail \_\_\_\_\_ ( 9/67)

(There are no C-E) HOLD 0 ( 9/68-  
 9/70)

F. Standard Mail A (e.g., advertising; formerly  
 third-class) \_\_\_\_\_ ( 9/71)

G. Standard Mail B (e.g., parcels; formerly  
 fourth-class) \_\_\_\_\_ ( 9/72)

H. International \_\_\_\_\_ ( 9/73)

(There is no I1) HOLD 0 ( 9/74)

(There are no I2 and I3) HOLD 0 (10/74-  
 10/75)

16. Does the U.S. Postal Service pick up mail at your  
 business location?

1 Yes - (Continue)  
 2 No (Skip to #19)  
 8 (DK) (Skip to #19)  
 9 (Refused) (Skip to #19) \_\_\_\_\_ (10/12)

17. (If code "1" in #16, ask:) Thinking about your experiences in the LAST THIRTY DAYS, how would you rate the U.S. Postal Service on convenience of mail pick up times by the USPS from your business location? Would you say it is (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair, OR  
 1     Poor

8     (DK)  
 9     (Refused)

\_\_\_\_\_ (10/13)

18. How would you rate the U.S. Postal Service on reliability of mail pick up times? Would you say it is (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair  
 1     Poor

8     (DK)  
 9     (Refused)

\_\_\_\_\_ (10/14)

- 18a. How would you rate the U.S. Postal Service on the number of pick up times? Would you say it is (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair, OR  
 1     Poor

8     (DK)  
 9     (Refused)

\_\_\_\_\_ (11/13)

19. Thinking about the equipment or supplies (trays, sacks) the U.S. Postal Service provided you in the LAST THIRTY DAYS, how would you rate the U.S. Postal Service on (read A-C)? Would you say (read 5-1)?

5     Excellent  
 4     Very good  
 3     Good  
 2     Fair, OR  
 1     Poor

7     (Not applicable)  
 8     (DK)  
 9     (Refused)

- A.    Knowledge or understanding of your equipment needs \_\_\_\_\_ (10/15)
- B.    Providing you with the equipment and supplies you need for preparing mailings \_\_\_\_\_ (10/16)
- C.    Maintaining Postal Service equipment in good working order \_\_\_\_\_ (10/17)

20. In the PAST THIRTY DAYS, how often have you had difficulty obtaining equipment or supplies (trays, sacks) you need for this business location? Would you say (read 1-4)?

1     Not at all  
 2     Once  
 3     Two or three times, OR  
 4     More than three times

7     (Not applicable)  
 8     (DK)  
 9     (Refused)

\_\_\_\_\_ (10/18)

1. How would you rate the U.S. Postal Service on the ease of contacting someone who can answer your questions? Would you say (read 5-1)?

- 5     Excellent
- 4     Very good
- 3     Good
- 2     Fair, OR
- 1     Poor

7     (Not applicable)

8     (DK)

9     (Refused)

\_\_\_\_\_ (10/19)

22. Do you have regular contact with one main person at the U.S. Postal Service?

1     Yes - (Continue)

2     No                                (Skip to #26)

8     (DK)                              (Skip to #26)

9     (Refused)                        (Skip to #26)

\_\_\_\_\_ (10/20)

23. (If code "1" in #22, ask:) What is the job title of your main contact? (Open ended and code) (If necessary, read 06-16)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
  
- 06 National Account Manager or Postal Account Manager
- 07 Account Representative
- 08 Facility Manager
- 09 Postmaster
- 10 Customer Service Representative
- 11 Business Mail Entry Unit Supervisor
- 12 Business Service Network Representative
- 13 Business Mail Acceptance Clerk
- 14 Postal Carrier
- 15 Post Office Window Clerk
- 16 Sales specialist

---

(10/21) (10/22)

(All in #23, Skip to #26a)

(There are no #24 and #25) HOLD 0 (10/23-10/28)

(There is no #25a) HOLD 0 (11/14)

26. How many different U.S. Postal Service employees are you in regular contact with? (Open ended and code)

- 1 None
- 2 Two
- 3 Three
- 4 Four
- 5 Five or more
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ (10/29)

26a. Have you been in contact with your National Account Manager in the PAST THIRTY DAYS?

- 1 Yes - (Continue)
- 2 No (Skip to #27a)
- 8 (DK) (Skip to #27a)
- 9 (Refused) (Skip to #27a)

\_\_\_\_\_ (11/30)

26b. (If code "1" in #26a, ask:) How would you rate your  
National Account Manager on (read and rotate A-F)?

- 5    Excellent
- 4    Very good
- 3    Good
- 2    Fair
- 1    Poor

- 8    (DK)
- 9    (Refused)

- A.    Understanding the mailing needs of your business \_\_\_\_\_ (11/31)
- B.    Working to find solutions to your mailing problems \_\_\_\_\_ (11/32)
- C.    Communicating to you changes in USPS rules, regulations, products or services relevant to your needs \_\_\_\_\_ (11/33)
- D.    Bringing you new ideas about how to handle your mailing needs \_\_\_\_\_ (11/34)
- E.    Speed of responding to your phone calls \_\_\_\_\_ (11/35)
- F.    Treating you like a valued customer \_\_\_\_\_ (11/36)



26c. In the past thirty days, how long did it take, on average, to get in touch with your National Account Manager? Was it (read 1-4)?

- 1 Less than two hours
- 2 Between two and four hours
- 3 Between four and eight hours, OR
- 4 Eight hours or more
- 7 (No contact in the past thirty days)
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ ( 7/57)

26d. How would you rate the overall service provided by your National Account Manager? Would you say (5-1)?

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair, OR
- 1 Poor
- 6 (DK)
- 7 (Refused)

\_\_\_\_\_ ( 7/58)

(There is no #27)

HOLD

\_\_\_\_\_ 0 (10/30-  
10/31)

27a. Have you been in contact with your Business Service Network Representative in the PAST THIRTY DAYS? [(If necessary, say:)] The Business Service Network is a system started by the U.S. Postal Service to get you information and solutions to problems by providing a single point-of-contact.] (NOTE TO INTERVIEWER: Customer Service Representative is the same as Business Service Network Representative)

- 1 Yes - (Continue)
- 2 No (Skip to #28)
- 3 (Not familiar with BSN) (Skip to #28)
- 4 (Respondent calls his/her National Account Manager or Postal Account Manager for service problems (Skip to #28)
- 8 (DK) (Skip to #28)
- 9 (Refused) (Skip to #28)

\_\_\_\_\_ (12/17)

27b. (If code "1" in #27a, ask:) How would you rate your Business Service Network Representative on (read and rotate A-G)? Would you say (read 5-1)? (NOTE TO INTERVIEWER: Customer Service Representative is the same as Business Service Network Representative)

- 5 Excellent
- 4 Very good
- 3 Good
- 2 Fair, OR
- 1 Poor
- 8 (DK)
- 9 (Refused)

27b. (Continued:)

- |    |                                         |       |         |
|----|-----------------------------------------|-------|---------|
| A. | Speed of responding to your phone calls | _____ | (12/18) |
| B. | Treating you like a-valued customer     | _____ | (12/19) |
| C. | Professionalism                         | _____ | (12/20) |
| D. | Follow through on promised action(s)    | _____ | (12/21) |
| E. | Accuracy of information                 | _____ | (12/22) |
| F. | Clarity of explanation                  | _____ | (12/23) |
| G. | Helpfulness                             | _____ | (12/24) |

27c. During the PAST THIRTY DAYS, do you feel the length of time it took to answer your questions or resolve your problems was (read 1-3)?

- |   |                                           |               |
|---|-------------------------------------------|---------------|
| 1 | Less time than you expected               |               |
| 2 | About the amount of time you expected, OR |               |
| 3 | More time than you expected               |               |
| 8 | (DK)                                      |               |
| 9 | (Refused)                                 | _____ (12/25) |

27d. How would you rate the overall service provided by your Business Service Network Representative during the PAST THIRTY DAYS? Would you say (read 5-1)?

(NOTE TO INTERVIEWER: Customer Service Representative is the same as Business Service Network Representative)

- |   |           |               |
|---|-----------|---------------|
| 5 | Excellent |               |
| 4 | Very good |               |
| 3 | Good      |               |
| 2 | Fair, OR  |               |
| 1 | Poor      |               |
| 8 | (DK)      |               |
| 9 | (Refused) | _____ (12/26) |

HOLD            0        (10/32-  
                                10/41)

28. Now, I am going to ask you about overall performance. Thinking about all aspects of U.S. Postal Service performance during the PAST THIRTY DAYS, how would you rate the service your business has received? Would you say (read 5-1)?

- |   |           |
|---|-----------|
| 5 | Excellent |
| 4 | Very good |
| 3 | Good      |
| 2 | Fair, OR  |
| 1 | Poor      |

- 8 (DK)  
9 (Refused) (10/42)

(There are no #29 and #30)

HOLD           0     (10/43-  
                      10/47)

During the PAST THIRTY DAYS, have you experienced serious problems with U.S. Postal Service products or services? Would you say (read 1-4)?

- ```

1      Not at all      -      (Skip to #33)
2      Once                                     (Continue)
3      Two or three times, OR                    (Continue)
4      More than three times                     (Continue)

```

- 8 (DK) (Skip to #33)  
9 (Refused) (Skip to #33) (10/48)

22. (If code "2", "3" or "4" in #31, ask:) What serious problems have you had in the PAST THIRTY DAYS? (Open ended) (Allow two responses)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD

1st  
Resp:                        
(10/49) (10/50)

2nd  
Resp:                        
(10/51) (10/52)

32a. Did you contact the postal service to discuss the problem? (NOTE TO INTERVIEWER: If more than one problem, ask about the most recent one)

- 1 Yes - (Continue)
- 2 No (Skip to #32c)
- 8 (DK) (Skip to #32c)
- 9 (Refused) (Skip to #32c)

           (11/37)

2b. (If code "1" in #32a, ask:) Who did you contact?  
(Open ended and code)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
- 06 National Account Manager or Postal  
Account Manager
- 07 Account Representative
- 08 Facility Manager
- 09 Postmaster
- 10 Customer Service Representative
- 11 Business Mail Entry Unit Supervisor
- 12 Business Service Network Representative
- 13 Business Mail Acceptance Clerk
- 14 Postal Carrier
- 15 Post Office Window Clerk

\_\_\_\_\_  
(11/38) (11/39)

(If code "2", "3" or "4" in #31, Continue;  
Otherwise, Skip to #33)

32c. Would you like me to pass along what you have just  
told me to the Postal Service and have a Postal  
representative call you about these problems?

- 1 Yes
- 2 No
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_  
(10/76)

33. Do you prepare or send mail for other companies?

- 1 Yes
- 2 No
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_  
(10/53)

34. Do you use a vendor to prepare or send mail for your company?

- 1 Yes - (Continue)
- 2 No (Skip to #36)
- 8 (DK) (Skip to #36)
- 9 (Refused) (Skip to #36)

\_\_\_\_\_ (10/54)

35. (If code "1" in #34, ask:) What percentage of your mail is prepared and/or sent by vendors? Is it (read 1-4)?

- 1 0% to 25%
- 2 26% to 50%
- 3 51% to 75%, OR
- 4 76% to 100%
- 8 (DK)
- 9 (Refused)

\_\_\_\_\_ (10/55)

36. In which of the following areas do you work? Is it (read 06-10, then 01)?

- 01 OR, some other area (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
- 06 Logistics
- 07 Mailroom
- 08 Financial operations
- 09 General office administration
- 10 Sales and marketing

\_\_\_\_\_ (10/56) (10/57)

37. What is your job title? (Open ended and code)

- 01 Other (list)
- 02 (DK)
- 03 (Refused)
- 04 HOLD
- 05 HOLD
  
- 06 Corporate officer/Owner
- 07 Mail operations
- 08 Financial operations
- 09 Administrative/Clerical

\_\_\_\_\_  
(10/58) (10/59)

38. Please estimate your company's yearly expenditures at this location on U.S. Postal Service products and services? (Open ended and code actual amount)  
(NOTE TO INTERVIEWER: Enter ALL zeros; for example, "100 thousand" - enter "1000000")

- DK (DK)
- RF (Refused)

\_\_\_\_\_  
(10/60 - 10/68)

(There is no #39)

HOLD

0 (10/69)

(There is no #39a)

HOLD

0 (10/76)



(NOTE TO SURVENT: Display:)

FONE FILE NAME:      (Code from "Fone" file)

\_\_\_\_\_  
(15/12 - 15/36)

NEW RESPONDENT NAME:      (Code from S4)

\_\_\_\_\_  
( 5/16 - 5/45)

40. (INTERVIEWER CODE:) Who are you talking to?

- 1      "Fone" file name
- 2      New respondent

\_\_\_\_\_  
(11/72)

- \*1. Let me verify that your name, company name and address are (read information from "Fone" file/S4)?  
(ENTER ALL THAT ARE INCORRECT)

NAME:        [(If code "1" in #40, display from  
"Fone" file)/(if code "2" in #40,  
display from S4)]

COMPANY NAME:    (Display from "Fone" file)

ADDRESS:        (Display from "Fone" file)

CITY:            (Display from "Fone" file)

STATE:           (Display from "Fone" file)

ZIP CODE:        (Display from "Fone" file)

PHONE NUMBER:   (Display from "Fone" file)

- 1     All information correct
- 2     Name is incorrect
- 3     Company name is incorrect
- 4     Address is incorrect
- 5     City is incorrect
- 6     State is incorrect
- 7     Zip code is incorrect
- 8     Phone number is incorrect

\_\_\_\_\_ (11/73)

(VALIDATE PHONE NUMBER AND THANK RESPONDENT)

INTERVIEWER READ:) Those are all the questions I have for you. I really appreciate your taking the time to talk with me. This is an ongoing survey, so I will call you again in about three months.

42. COMMENTS: (INTERVIEWER - Enter any observations)

\_\_\_\_\_  
(11/74) (11/75)

INTERVIEWER I.D.# \_\_\_\_\_ ( 2/41-  
2/44)

vkt\larsen\usps-bcs-national-ap02 2000-910

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

3153

**OCA/USPS-54.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of consumer preferences and needs with respect to existing or potential Postal Service products and services. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

Objection and joint motion for protective conditions filed on October 15, 2001.

Supplimented 12/14/01

**SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-55.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of window service furnished to customers at Postal Service retail facilities. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

See response to OCA/USPS-52.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

3155

**OCA/USPS-55.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of window service furnished to customers at Postal Service retail facilities. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

Objection and joint motion for protective conditions filed on October 15, 2001.

Supplemented 12/14/01

**SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-56.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of assistance and/or information provided by Postal Service employees and contractors to the public in response to telephone inquiries. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, *other companies or other organizations*. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

See response to OCA/USPS-52.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-56.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of assistance and/or information provided by Postal Service employees and contractors to the public in response to telephone inquiries. Please include such materials produced since 1990, whether the work was performed by the Postal Service, its contractors, independent agencies, other companies or other organizations. Products and services include but are not limited to First Class Mail, Priority Mail, Express Mail, Parcel Post, Standard A Mail, Standard B Mail, Periodicals, Insurance, Registered Mail, Certified Mail, Money Orders, Return Receipt Requested, and Delivery Confirmation. This request does not apply to any data being separately furnished under OCA/USPS-7 or OCA/USPS-51.

**RESPONSE:**

Objection and joint motion for protective conditions filed on October 15, 2001.



Supplimented 12/14/01

**SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-57.** Please provide copies of all studies, customer surveys, employee surveys, and publicly available surveys in the possession of the Postal Service related to the measurement, review, and/or evaluation of the delivery service provided by Rural and City carriers to postal customers.

**RESPONSE:**

See response to OCA/USPS-52.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

OCA/USPS-58. In July, 1980, the Postal Service prepared the "Nonhousehold Mailstream Study." Has the Postal Service updated this study? If so, please provide a copy of the updated study. If not, please explain why an updated study has not been conducted.

**RESPONSE:**

No. Please see the response filed to a very similar question (OCA/USPS-38) in the last case (Docket No. R2000-1, Tr. 21/9048).

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES**

OCA/USPS-59. Please provide the following data in a format that is amenable to importing into an EXCEL spreadsheet. For each FY 2000 and FY 2001 quarter and for each Postal Service area, please provide the actual on-time delivery record by weight increment for Priority Mail.

**RESPONSE:**

The requested data are not available.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES**

**OCA/USPS-60.** The following refers to an article, "Special delivery?" published in Consumer Reports, December 1998. A copy of the article follows as Attachment 1.

- (a) Since December 1998, has the Postal Service performed any analyses, studies, reports or prepared any articles regarding the comparison of USPS Express Mail, Priority Mail and Parcel Post offerings with similar services offered by Federal Express and United Parcel Service? If so, please provide a copy of each. If not, please explain why the Postal Service has performed no comparisons.
- (b) The Consumer Report article indicates that the FedEx sued the Postal Service for "false advertising." Please indicate the outcome of the lawsuit.
- (c) Were/are the legal costs of defending the Postal Service's Priority Mail advertisements charged to Priority Mail? If so, please identify the account number charged and the segments and components impacted. If not, please identify where the labor and any other costs associated with the Priority Mail advertisement defense were/are expensed and explain why the costs were/are not charged to Priority Mail.
- (d) Are the legal costs of defending a given class of mail, (e.g., Express Mail and Priority Mail) expensed to the applicable class of mail? If not, please explain why they are not expensed to the class incurring the cost.
- (e) For FY 2000 and FY 2001, please provide the following information in a format amenable to importing into an EXCEL spreadsheet: (1) the number and nature of the complaint lodged with the Postal Service regarding the accuracy or truthfulness of Priority Mail advertisements; and, (2) the number and nature of the complaint lodged with the Postal Service regarding the accuracy or truthfulness of Express Mail advertisements.
- (f) In the attached article, Consumer Reports found that only about 65 percent of Express Mail overnight packages arrived on time (page 1 of the Attachment). Please provide the on-time percentage of Express Mail overnight pieces of all types for FY 1999. Please state the source for the answer and provide a copy of the source material if it is not already on file with the Commission.
- (g) Also provide the on-time percentage of Express Mail Second-Day pieces of all types for FY 1999. Please state the source for the answer and provide a copy of the source material if it is not already on file with the Commission.
- (h) According to a chart appearing at page 5 of the Attachment, the Postal Service guarantees overnight delivery to "some 130 major markets only." Please list all of the major markets for which the Postal Service provides Express Mail Overnight service.
- (i) Please list all remaining major markets for which the Postal Service offers Express Mail Second-Day service.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES**

**RESPONSE:**

- (a)-(b) Objections filed.
- (c) The Postal Service's legal costs of defending the Postal Service's Priority Mail advertisements in this instance were not tracked and/or accounted for separately from other Postal Service legal costs. These costs were included within the Postal Service's institutional costs. These costs were not "charged to Priority Mail" because, in the judgement of the Postal Service, there was no appropriate accounting or economic basis for doing so.
- (d) No. In the judgement of the Postal Service, there is no appropriate accounting or economic basis for doing so.
- (e) Objection filed October 22, 2001.
- (f) FY 1999 Express Mail Overnight on-time percentage is 90.6. This information was derived from the Electronic Marketing Reporting System (EMRS).
- (g) FY 1999 Express Mail 2-Day on-time percentage is 91.6. This information was derived from EMRS.
- (h) and (i) Objection filed.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES

OCA/USPS-60. The following refers to an article, "Special delivery?" published in Consumer Reports, December 1998. A copy of the article follows as Attachment 1.

- (a) Since December 1998, has the Postal Service performed any analyses, studies, reports or prepared any articles regarding the comparison of USPS Express Mail, Priority Mail and Parcel Post offerings with similar services offered by Federal Express and United Parcel Service? If so, please provide a copy of each. If not, please explain why the Postal Service has performed no comparisons.
- (b) The Consumer Report article indicates that the FedEx sued the Postal Service for "false advertising." Please indicate the outcome of the lawsuit.
- (e) For FY 2000 and FY 2001, please provide the following information in a format amenable to importing into an EXCEL spreadsheet: (1) the number and nature of the complaint lodged with the Postal Service regarding the accuracy or truthfulness of Priority Mail advertisements; and, (2) the number and nature of the complaint lodged with the Postal Service regarding the accuracy or truthfulness of Express Mail advertisements.

**RESPONSE:**

- (a) Please see USPS-LR-J-201, filed under protective conditions pursuant to Presiding Officer's Ruling No. R2001-1/12.
- (b) The litigation was settled. Disclosure of the terms of the settlement is prohibited by the settlement agreement.
- (e) Attached is the FY 2001 summary report for advertising from the Consumer Affairs Tracking System, maintained by the Postal Service's Consumer Advocate Office. The report is not available in a format amenable to importing into an EXCEL spreadsheet. This is the only information available responsive to the interrogatory.

Issue	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
USPS Advertisements	5	5	13	29	29	24	16	23	7	8	11	11	9	190
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Corporate Campaign	1	0	2	8	10	7	4	8	0	3	0	2	4	49
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Objects To Spokesperson	0	0	0	1	2	1	0	0	0	0	0	0	0	4
Objects To Sponsorship/Events	0	0	0	1	2	0	1	0	0	0	0	0	3	7
Objects To USPS Advertisement	0	0	2	6	1	5	0	5	0	1	0	1	0	21
Other	1	0	0	0	5	1	3	3	0	2	0	1	1	17
USPS Spends Too Much Money	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Express Mail	2	2	0	0	0	1	1	0	2	0	0	0	0	8
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
FCATS v 2.3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Inaccurate Information	1	1	0	0	0	1	1	0	0	0	0	0	0	4
Objects To USPS Advertisement	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Other	1	1	0	0	0	0	0	0	1	0	0	0	0	3
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
FCATS v 2.3	0	0	0	1	1	0	0	1	0	0	0	0	0	3
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
FCATS v 2.3	0	0	0	1	1	0	0	1	0	0	0	0	0	3
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
FCATS v 2.3	0	0	0	1	1	0	0	1	0	0	0	0	0	3

## Page 2 of 3

[illegible]



Attachment to response B466  
OCA/USPS-60(c)

Involved	Signs In Lobby	Details	Inaccurate Information	Objects To Sponsorship/Events	Objects To USPS Advertisement	Other
AP 1	0	AP 1	0	0	0	0
AP 2	1	AP 2	0	0	0	1
AP 3	7	AP 3	2	0	1	4
AP 4	7	AP 4	3	0	1	3
AP 5	4	AP 5	3	0	0	1
AP 6	5	AP 6	1	0	2	2
AP 7	2	AP 7	1	0	0	1
AP 8	4	AP 8	1	0	1	2
AP 9	3	AP 9	0	1	0	2
AP 10	2	AP 10	1	0	0	1
AP 11	4	AP 11	0	0	2	2
AP 12	3	AP 12	1	1	0	1
AP 13	1	AP 13	0	0	0	1
YTD 43		YTD	13	2	7	21

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-61.**

Please refer to USPS-LR-J-58, pages 14 and 15 of 33, entitled "First-Class Single-Piece Test Year Unit Costs by Detailed (1/2 ounce) Weight Increments." For ounce increments, please describe and give examples of letter-shaped pieces in each ounce increment.

**RESPONSE:**

Letter-shaped pieces for ounce increments 4 to 5, 5 to 6, 6 to 7, 7 to 8, 8 to 9, 9 to 10, 10 to 11, 11 to 12, and 12 to 13+ consists of mail pieces which conform to the dimensions specified for letter-shaped mail, which weigh the appropriate weight, and which qualify for First-Class Mail single piece rates. There are no Postal Service data systems that collect information on the contents of mail pieces by ounce increment. First-Class Single Piece letter-shaped mail 4 to 13+ ounces accounts for only 0.1 percent of all single piece letter-shaped First-Class Mail, as shown in USPS-LR-J-58.



**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

First Class Mail data are not segregated by sub-class. Standard Mail is 40.1 percent (379,404,000/946,754,000).

e. First-Class Mail data are not segregated by sub-class.

The volume of letter-shaped mail without barcodes in:

(i) FY 1999 is 17,202,837,000. First Class Mail is 57.1 percent (9,829,438,000/17,202,837,000). Standard Mail is 42.9 percent (7,373,399,000/17,202,837,000).

(ii) FY 2000 is 15,870,390,000. First Class Mail is 57.4 percent (9,105,107,000/15,870,390,000). Standard Mail is 42.6 percent (6,765,283,000/15,870,390,000).

(iii) FY 2001 is 14,167,790,000. First Class Mail is 59.8 percent (8,467,994,000/14,167,790,000). Standard Mail is 40.2 percent (5,699,796,000/14,167,790,000).

(iv) AP 13 FY 2001 is 908,890,000. First Class Mail is 60.1 percent (545,863,000/908,890,000). Standard Mail is 39.9 percent (363,027,000/908,890,000).

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-63.** Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at pages 9 and 10, lines 17-30, and lines 1-9, respectively.

- a. Please confirm that every letter-shaped piece that is manually processed is subject to the proposed nonmachinable surcharge. If you do not confirm, please explain.
- b. Please identify every operation (e.g., Entry Activities; Outgoing RBCS; Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing. Please explain how the separation is made.
- c. Please provide the base year and test year volume for letter-shaped pieces separated from the letter-shaped mailstream for manual processing at every operation identified in part b.
- d. Please identify every operation (e.g., Entry Activities; Outgoing RBCS; Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces separated from the letter-shaped mailstream for manual processing are determined to be nonmachinable and subject to the proposed nonmachinable surcharge. Please explain how the determination is to be made.
- e. Please provide the base year and test year volume for letter-shaped pieces separated from the letter-shaped mailstream for manual processing and determined to be nonmachinable at every operation identified in part d.
- f. Please confirm that every letter-shaped piece for which machinable postage has been affixed when entered with the Postal Service, but is subsequently determined during processing to be subject to the proposed nonmachinable surcharge, will be marked "Postage Due." If you do not confirm, please explain.
- g. Please confirm that the recipient of a letter-shaped piece that is determined during processing to be subject to the proposed nonmachinable surcharge will not know that the surcharge should be paid if the letter-shaped piece is not marked "Postage Due." If you do not confirm, please explain.
- h. Please confirm that the Postal Service will not be able to collect the proposed nonmachinable surcharge from the recipient of a letter-shaped piece that is determined during processing to be subject to the surcharge if the letter-shaped piece is not marked "Postage Due." If you do not

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

confirm, please explain and describe the method by which the proposed nonmachinable surcharge will be collected.

- i. Please confirm that the mailer of a letter-shaped piece that is determined during processing to be subject to the proposed nonmachinable surcharge will not be informed that the surcharge should be paid. If you do not confirm, please explain and describe the method by which the mailer will be informed.
- j. Please confirm that the Postal Service will not be able to collect the proposed nonmachinable surcharge from the mailer of a letter-shaped piece that is determined during processing to be subject to the surcharge. If you do not confirm, please explain and describe the method by which the proposed nonmachinable surcharge will be collected.

**RESPONSE:**

- (a) Not confirmed. As an example, letters with insufficient addresses or automation rate letters that are rejected on automation may, as a result, be directed to manual operations and would not be subject to the proposed nonmachinable surcharge.
- (b) Letters requiring manual processing are identified in collection mail preparation, tray breakdown, and all letter automation operations. The culling equipment in the mail prep operation sorts out manual letters based on height length, and thickness. Also, mailhandlers cull manual letters from the collection mailstream as the pieces cross culling belts. As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters. Letters also are culled out prior to induction into letter sorting equipment by the feeder, if necessary. Finally, volume can be diverted to the manual mailstream once

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

processed by the equipment but sorted to reject stackers due to lack of machinability.

- (c) Refer to USPS-T29, Attachment C, pg. 1, and Attachment F, pg. 3, for the Base Year and Test Year volumes for Nonstandard/Nonmachinable First-Class Single-Piece and Nonautomated Presorted Letters. The Base Year volumes include only the pieces assessed the Nonstandard Surcharge based on the current definition, and the Test Year After Rates volumes include an estimate of the additional pieces meeting the proposed nonmachinable definition. No data exist by operation.
- (d) Retail and Business Mail Entry Unit (BMEU) acceptance personnel will determine if letters are Nonstandard/Nonmachinable based on the nonmachinable definition specified by the Postal Service.
- (e) See response to subpart (c) above. Volumes are unavailable by operation.
- (f) – (j) Not confirmed. Pieces originally determined to be machinable at the retail window or BMEU but determined subsequently to be nonmachinable during processing, are intended to be treated similar to the existing non-standard surcharge pieces. We realize that not all pieces of non-bulk non-standard mail are currently captured as “Postage Due” either due to customer or Postal Service error. Bulk mailings are often permit imprinted and do not indicate the postage paid on the piece. Therefore, processing personnel assume the pieces have been appropriately charged at entry and will not be marked “Postage Due”.

**RESPONSES OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-64.** The American Customer Satisfaction Index is a national economic indicator of customer satisfaction with the quality of goods and services available to household consumers in the United States. Approximately 30 government agencies participate in the Index.

- (a) Does the Postal Service currently participate in the Index?
- (b) If the answer to (a) is negative, please discuss why the Postal Service does not participate. Provide specific cites to all documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (c) If the answer to (a) is positive, please furnish copies of all results.

**RESPONSE:**

- (a) Yes, the Postal Service is included in the Index.
- (b) Not applicable.
- (c) See objection filed on October 29, 2001.



Supplimented 12/21/01

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-65.** Has the Postal Service ever participated in the American Customer Satisfaction Index? If so, please furnish copies of the results.

- (a) If the answer is positive, please discuss why the Postal Service commenced its participation in the Index and what benefits or advantages it expected to accrue by participation. Provide specific cites to all documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (b) If the Postal Service did at one time participate in the Index but no longer does, please discuss the circumstances that led to the cessation of participation and the reasons for ceasing to participate. Provide specific cites to all documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

**RESPONSE:**

The Postal Service has been included in the Index since its inception, as part of the Transportation, Communications and Utilities sector. The Postal Service has never been given a choice as to whether to participate, but has simply been included in the list of organizations about which data has been collected.

Publicly available portions of the Index can be viewed at its website, [www.asq.org/info/acsi/scores/transcommutil.htm/](http://www.asq.org/info/acsi/scores/transcommutil.htm/).

(a) Objection filed on October 29, 2001.

(b) Objection filed on October 29, 2001.

**SUPPLEMENTAL RESPONSE:**

An additional website is as follows:

<http://www.bus.umich.edu/research/nqrc/Q1-01.html#par>

The Postal Service does not have any other publicly available ACSI results other than those posted on the two websites provided here.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-74.** Express Mail Label 11B (reverse side) contains the statement: "consult your local Express Mail directory for noon and 3:00 PM delivery areas. . . ." Please provide a copy of the master directory for Express Mail for all ZIP Code pairs, indicating whether noon, 3 p.m., or second-day service is available. Additionally, provide the master directory in a format that expresses the ZIP Code pairs as "city, state" and/or "town, state" pairs.

**RESPONSE:**

For FY2001, 48.43 percent of total Express Mail volume was accepted for overnight/noon delivery, 30.09 percent for overnight/3:00 p.m. delivery, and 21.48 percent for two-day delivery. These figures do not include Express Mail Custom Designed service volumes, nor do they indicate whether the mail achieved the applicable level of service.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-75.

The following interrogatory refers to Postal Service vending machines.

- (a) Has the Postal Service considered offering "rolls" of First-Class first-ounce letter stamps in its vending machines? If so, please explain when the service will be available to the public. If not, please explain why the service is not being offered.
- (b) Has the Postal Service considered allowing Postal Service vending machine customers to pay for their purchases with a credit card (e.g., MasterCard, Visa, etc.)? If so, please explain when the service will be available to the public. If not, please explain why the service is not being offered.

RESPONSE:

- (a) The Postal Service currently offers coils (rolls of 100) of basic First-Class Mail stamps in 5,000 vending machines nationwide.
- (b) The Postal Service has completed a test of vending machine debit/credit. At this time, it is expected that the Postal Service may present a Decision Analysis Report to the Board of Governors in the middle of calendar year 2002 for consideration. If the expenditure is approved, the Postal Service could begin to deploy vending machines capable of accepting credit cards as early as the first half of calendar year 2003.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-76.** The following interrogatory refers to Postal Service Express Mail Label 11-B dated July 1997. The back of Label 11-B has the following information, "Claims: Original customer receipt of the Express Mail label must be presented when filing an indemnity claim and/or for a postage refund."

(a) The Label 11-B further states that: [t]o file a claim for damage, the article, container, and packaging must be presented to the USPS for inspection. To file a claim for loss of contents, the container and packaging must be presented to the USPS for inspection. **DO NOT REMAIL.**

- (1) If the recipient files the claim, please confirm that the recipient does not need a copy of the "Original customer receipt of the Express Mail label." If you are unable to confirm, please explain who must file the original customer receipt, when the receipt must be filed, and where the receipt must be filed. See DMM SO10.2.8.
- (2) DMM SO1 0.2.7 states that : [i]f a claim is filed because some or all of the contents are missing, the customer must present the container and packaging to the USPS when filing the claim. Failure to do so results in the denial of the claim. Given this statement, please identify who the "customer" is – the sender or the recipient? If your response is the sender, please explain how the sender can present the container and packaging to the USPS without a "re-mail" occurring? If the customer is the recipient, does the recipient also need to supply the "Original customer receipt of the Express Mail label?" If so, please explain how the recipient is supposed to get the original Express Mail customer receipt label.

(b) On October 16, 2001, an Express Mail late delivery refund was requested at the Martin Luther King Station, in Washington, DC. The Express Mail piece was mailed on Friday, October 12, 2001 and as of Tuesday, October 16, 2001 it had not arrived at its destination. The sender asked the window clerk for the "original customer receipt of the Express Mail label" to be returned after the refund was processed so that in the event a future indemnity claim had to be filed the original receipt would be available. The window clerk stated that she could not return the receipt. In this situation, if the Express Mail package subsequently arrives late and is damaged or has a part of its contents missing, how does the sender or recipient file an indemnity claim since the "Original customer receipt of the Express Mail label" has already been turned over to the window clerk? If your response is that an indemnity claim cannot be filed without the receipt, please explain why the window clerk did not inform the sender when the postage refund was requested.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**RESPONSE:**

(a)(1) Confirmed. The customer must present the original receipt, not a copy, with the article in order to file a claim, which can be filed by the sender or the recipient. The customer may also present the original wrapper to file a claim. Please see DMM S010.2.5.

(2) The customer could be the sender or the recipient, except in the case of a complete loss, in which a claim can only be filed by the sender. If the sender files the claim and the addressee has the damaged article, the sender's post office sends the claim to the addressee and the addressee presents the article to the Postal Service without remailing. Also, the addressee could possibly hand carry the article to the sender and the article could be presented without remailing. Please see DMM S010.2.8.

(b) The customer should not file for a refund of postage until they are sure that an indemnity claim will not be filed. The customer should file for complete loss only after seven days. Also, the window clerk should have informed the customer that the postage refund would have to be included in any claim for indemnity, so that the indemnity amount and the postage amount can be filed together.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-79.** The following refers to USPS-LR-J-144, volume 1. Please provide a copy of the video "Priority Mail" identified on page 109 of "Module 5: Domestic Mail."

**RESPONSE:**

See USPS-LR-J-160, Priority Mail and Express Mail Training Videotapes, Provided in Response to OCA/USPS-79, 81.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES**

**OCA/USPS-80.** The following information is provided in USPS-LR-J-144, volume 1, Module 5: Domestic Mail at page 112.

*First Class/Priority - handwritten or typewritten personal correspondence such as bills, statements of account, postal cards, and business reply mail. It is closed against inspection. Something small such as circulars, booklets, flower bulbs, devices, keys, seeds, etc. Normally 2-3 day service (Priority) not guaranteed.*

Given this First-Class/Priority mail information provided to "new Sales and Services Associates" and the difference in postal rates between the two offerings, please explain why a postal customer should spend more money to ship something via Priority Mail versus First-Class Mail when both apparently have a 2-3 day service standard and neither guarantees a delivery standard.

**RESPONSE:**

Although Priority Mail and First-Class Mail both have 1-3 day delivery standards, the 2-day service standard range is much wider for Priority Mail than for First-Class Mail. In fact, while the majority of Priority Mail's three-digit ZIP Code pairs have a 2-day service standard, the majority of First-Class Mail's three-digit ZIP Code pairs have a 3-day service standard. Consequently, service standards are higher (faster), on average, for Priority Mail than for First-Class Mail.

While neither Priority Mail nor First-Class Mail guarantees on-time delivery, Priority Mail has other advantages over First-Class Mail:

- Delivery Confirmation is available for all Priority Mail pieces, not just parcels, as proposed for First-Class Mail in USPS-T-36.
- The Postal Service provides free boxes, tape, stickers, labels, and envelopes for Priority Mail but not for First-Class Mail.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES**

**Response to OCA/USPS-80 (Cont.)**

- Priority Mail gets mail processing priority over First-Class Mail. See Postal Operations Manual, Section 453.
- Priority Mail is "in line" for dispatch to transportation resources, both air and surface, ahead of First-Class Mail.
- While First-Class Mail and Priority Mail both get top delivery priority (see Postal Operations Manual, Section 621.1), Priority Mail will be delivered first in the unlikely event that not all Priority Mail and First-Class Mail can be taken out for delivery. In addition, during the year-end holiday season, if necessitated by local operating conditions, Priority Mail, but not First-Class Mail, will be delivered on supplemental Sunday routes.
- Priority Mail may receive less handling than other mail.



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-81.** The following refers to USPS-LR-J-144, volume 1. Please provide a copy of the video "Express Mail" identified on page 125 of "Module 6: Express Mail Service."

**RESPONSE:**

See USPS-LR-J-160, Priority Mail and Express Mail Training Videotapes, Provided in Response to OCA/USPS-79, 81.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-83.** For the following interrogatory, please assume that a postal recipient arrives at a postal window with a complaint about merchandise that was sent to the recipient with "delivery confirmation." However, the recipient never received the merchandise and is now in receipt of bills for the undelivered merchandise. The store claims the recipient received the merchandise.

- (a) If the merchant must file the claim and has information that the merchandise was delivered, please explain how the postal recipient is able to verify who actually received the merchandise.
- (b) How does the postal recipient use the "Delivery Confirmation" service? Since the postal recipient ordered the merchandise and was charged for postal expenses, who is the customer of the Postal Service?
- (c) What guidance are the postal clerks given in accepting postal patron complaints regarding "Delivery Confirmation" service?
- (d) What actions does the Postal Service take in researching and resolving a "Delivery Confirmation" complaint?
- (e) What is the average time a postal consumer can expect to wait for a response from the Postal Service regarding a claim of this type?
- (f) Which Postal Service department(s) would have responsibility for this complaint?
- (g) If the "Delivery Confirmation" research shows that the merchandise was not actually delivered to the recipient, what recourse through the Postal Service does the recipient have to resolve the issue with the merchant? Include in your response the steps that the Postal Service will take to assist the recipient.

**RESPONSE:**

- (a) Delivery Confirmation service provides the date, time, and ZIP Code of delivery (or delivery related event). It does not capture the recipient name.
- (b) Although we serve both, in this instance, the "customer" would be the mailer who chose to use Delivery Confirmation service, and who obtained the Delivery Confirmation service number when mailing the article. The

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-83, Page 2 of 3**

postal recipient can check the Delivery Confirmation information if the mailer provides the recipient with the Delivery Confirmation service number for the item at issue.

- (c) Delivery Confirmation complaints would be handled like complaints for other special services. Management Instruction PO-250-93-2 (attached), which is being updated to reflect organizational changes, provides guidance on the minimum requirements for handling, tracking, and assigning accountability for timely response to customer complaints. The customer can complete a Consumer Service Card, which has a response commitment, either in writing or verbally, within five days. Also, see the training materials provided in library reference J-144, including Sales and Service Associate Training, Module 21, Delivery Confirmation.
- (d) If the customer states that they did not receive the service expected, this is confirmed by looking up the item and seeing if a delivery or other delivery-related scan is present. If it is not, the customer is eligible for a service fee refund.
- (e) Requests for service failure refunds are generally handled while the customer waits. General service complaints at the local level are also generally handled while the customer waits, although sometimes follow up is necessary. DMM P014 addresses refund policy issues, which are subject to local discretion; no length of time is listed for non-indemnity

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-83, Page 3 of 3**

special service items. A Consumer Service Card can be filed about any service failure. Cards are logged and local commitment is a response, either verbally or in writing, within five days.

- (f) The local Post Office is responsible for dealing with individual customer complaints. Escalation would be to the District Consumer Affairs Office.
- (g) Delivery Confirmation service does not indicate a specific recipient. It only indicates a delivery (or delivery-related) scan event. So the research could only show whether or not the item was delivered, rather than that the merchandise was or was not delivered to a particular recipient. Thus, Delivery Confirmation service cannot resolve a dispute about whether an item was delivered to a particular recipient.



# Management Instruction

## Complaint Resolution and Proper Use of the Consumer Service Card

This instruction establishes the minimum requirements and standard response time for answering customer complaints and establishes procedures for handling, tracking, and assigning accountability for timely response. Postal employees are to ensure timely, customer-friendly, and professional complaint resolution.

Date	August 12, 1993
Effective	Immediately
Number	PO-250-93-2
Obsoletes	MI-PO-250-91-3
OCC Code	CA101
 Ann McK. Robinson Vice President and Consumer Advocate	

### BACKGROUND

The Customer Satisfaction Index indicates that prompt response to and resolution of customer complaints will increase customer satisfaction with the complaint handling process. The Customer Satisfaction Index points out areas where prompt response is receiving low marks from our customers and needs improvement.

### SCOPE

The following, or their designees, are responsible for implementing these requirements and for informing assigned personnel about local procedures for responding to or forwarding complaints received:

1. Headquarters Consumer Affairs.
2. Area office managers.
3. Customer Services district managers.
4. Plant managers.
5. Consumer Affairs and Claims managers.
6. Postmasters and station or branch managers.
7. Postal employees delegated responsibility for handling complaints.

### SOURCE OF COMPLAINTS

The Postal Service receives complaints from business and residential customers who report them through:

1. Form 431 4-C, *Consumer Service Card (English)*.
2. Form 4314-A, *Consumer Service Card (Spanish)*.
3. Telephone and personal contact.
4. Written correspondence, including customer surveys (e.g., the Customer Satisfaction Index).
5. Headquarters to field referrals (customer correspondence initially directed to the postmaster general or the

consumer advocate, then reassigned to the field for resolution).

6. Governmental inquiries from the legislative and executive branches of the federal government.

### RESPONSIBILITY

**Headquarters Management.** Headquarters Consumer Affairs is responsible for establishing requirements and measuring compliance with this instruction.

**Field Management.** The following managers must ensure compliance with this instruction and resolve complaints within their areas of responsibility:

1. Area managers.
2. District managers.
3. Plant managers.
4. Consumer Affairs and Claims managers.
5. Postmasters and station or branch managers.

■ Consumer Affairs and Claims managers must also do the following:

1. Monitor activity throughout their respective districts for compliance with this instruction.
2. Refer customer complaints to the appropriate functional areas for resolution.
3. Establish and maintain a customer complaint file.

■ Postmasters and station or branch managers must also do the following:

1. Ensure that their offices meet the requirements of this instruction.
2. Maintain one or more customer complaint control logs (see example on page 4).
3. Investigate and take corrective action to resolve complaints by contacting and working with other

functional areas of the Postal Service, if necessary, to resolve customer complaints.

4. Establish and maintain a complaint file.

■ Other postal employees, especially window clerks, are to provide the customer with a Consumer Service Card or refer the customer to the appropriate functional area.

### PROCEDURES

**Time Frames.** Follow the procedures in the following chart to ensure that necessary actions are performed within the indicated time frames:

	Time Frame	Action
Initial Contact	Within 24 hours after receiving complaint	Acknowledge complaint by preprinted postcard, letter, telephone call, or personal contact with the customer.
Final Response	Within 14 days after receiving complaint	Send a final response to the customer by telephone, letter, or personal contact. The final response must be comprehensive and either describe how the problem was or will be corrected, or explain why the problem cannot be corrected.

**Exception to Final Response Requirement.** The final response time discussed above does not apply to complaints requiring issuance of a publication watch for daily, weekly, and monthly newspapers or magazines. All other requirements do apply. Process the publication watch in accordance with Management Instruction PO-440-88-4, *Publication Watch Revised Form and procedures*, dated 10/21/88. The timeframes for responding to these complaints areas follows:

Type of Publication	Final Response Due
Daily	Within 35 days after complaint received
Weekly	Within 45 days after complaint received
Monthly	Within 75 days after complaint received

**Maintaining Customer Complaint Control Log.** Maintain one or more customer complaint control logs at every office to ensure timely response to customer complaints and to facilitate routine analysis of complaint activity.

**Content.** Include the following information in the customer complaint control log:

1. Office name and ZIP Code.
2. Customer name.
3. Company name, if applicable.

4. Customer address.
5. Customer telephone number.
6. Control number (i.e., Consumer Service Card number).
7. Subject of complaint.
8. Type of contact.
  - a. Type of 24-hour acknowledgment (i.e., telephone, letter, postcard, personal).
  - b. Type of final response (i.e., telephone, letter, personal).
9. Date received.
10. Suspense date.
11. Assignment of responsibility for suspense and resolution of the complaint.
12. Date closed.

**Complaints Resolved Immediately.** If a complaint received over the telephone or in person is resolved immediately, document the contact in the customer complaint control log. However, if further investigation is needed, advise the customer and complete a Consumer Service Card.

**Completing the Consumer Service Card.** The Consumer Service Card is completed by one of the following methods:

1. A customer completes the Consumer Service Card, retains copy 1, and either gives the form to a postal employee or mails it, following the directions on the top of copy 1.
2. A postal employee completes a Consumer Service Card when a customer comment is received over the telephone, in person, or by letter when follow-up action must be taken or the comment or complaint must be referred elsewhere for action or resolution.

**Processing a Complaint Made In Person.** Follow these instructions when processing a Consumer Service Card that is received in person:

1. Ensure that the customer has provided complete information if he or she hands in the Consumer Service Card in person. Verify that the following information is legible on all parts:
  - a. Card number.
  - b. Customer name.
  - c. Complete address and ZIP Code.
  - d. Card date.
2. Enter the information in the customer complaint control log using the Consumer Service Card number as the control number.
3. Carefully separate and send copy 2 of the Consumer Service Card to the St. Louis Consumer Service Card Unit on the same date the Consumer Service Card is received from a customer or completed by a postal employee.
4. Acknowledge having received the complaint, within 24 hours, by preprinted postcard, letter, telephone call, or personal contact.

5. Investigate the complaint.
6. Document the response in the *USPS Use Only* section on copy 3 of the Consumer Service Card. Include the date the customer was contacted, who made the contact, and a brief description of the action taken.
7. Send copy 3 to the Consumer Service Card Unit on the date action is completed and file copy 4 locally, along with any letters or attachments.

NOTE: Copies 2 and 3 should be sent to the Consumer Service Card Unit on the same day only if follow-up action is completed on the same day the comment is received.

8. Enter the date the complaint was closed on the customer complaint control log.

**Processing a Written Complaint.** Follow these instructions when processing a written complaint:

1. Transfer all vital information from the letter of complaint to a Consumer Service Card and enter it in the customer complaint control log using the Consumer Service Card number as the control number.
2. Follow processing procedures above.

**Processing a Telephoned Complaint.** Follow these instructions when processing a complaint made by telephone:

1. Complete a Consumer Service Card and log it in the customer complaint control log using the Consumer Service Card number as the control number.
2. Follow processing procedures above.

**Mailing the Consumer Service Card.** Instructions for mailing the Consumer Service Card to the Consumer Service Card Unit are as follows:

1. Do not staple Consumer Service Cards or include attachments, such as letters. (Attachments should be filed locally with copy 4.) Document all relevant information in the appropriate sections of the Consumer Service Card.
2. Do not fold the Consumer Service Card. Use an envelope measuring 6-1/2 inches by 9-1/2 inches or larger.
3. Divide copies 2 and 3 into separate batches. Mail both batches in one envelope each day to:  
  
CONSUMER SERVICE CARD UNIT  
UNITED STATES POSTAL SERVICE  
PO BOX 80479  
ST LOUIS MO 63180-9479.

**Headquarters to Field Referrals.** The following apply:

1. The Consumer Affairs and Claims manager is responsible for transferring information from customer correspondence to the customer complaint control log, for assigning the suspense date, and for ensuring that an appropriate response is made within 14 days from the date the district office received the complaint.

2. Field offices must respond within the assigned suspense date established by the Consumer Affairs and Claims manager.
3. 24-hour acknowledgment will have been made by Headquarters.

**Government Inquiries.** Process inquiries from legislative and executive branch officials as follows:

1. Follow procedures in *Administrative Support Manual* 338.
2. Process inquiries regarding service to a postal customer in the area served as written correspondence. These inquiries must receive prompt and conscientious attention.

### MEASUREMENT OF EFFECTIVENESS

Consumer Affairs monitors the quality and timeliness of complaint resolution by conducting reviews of the following:

1. Customer Satisfaction Index.
2. Consumer Affairs field audits.
3. Periodic reports on the Consumer Service Card program.

### BENEFITS

The Postal Service expects to:

1. Improve customer satisfaction with the complaint handling process.
2. Establish accountability for effective resolution of customer complaints.
3. Identify and correct service deficiencies which cause complaints.

### REFERENCES

The following reference material, available from the materiel distribution centers, must be accessible to assist postal employees in resolving complaints related to Postal Service policy or regulations:

- *Domestic Mail Manual (DMM)*
- *Administrative Support Manual (ASM)*
- *International Mail Manual (IMM)*
- *Posts/Operations Manual (POM)*
- *Handbook PO-250, Consumer Answer Book*
- *Handbook M-38, Management of Rural Delivery Services*
- *Handbook M-41, City Delivery Carriers Duties and Responsibilities*
- *Handbook PO-102, Retail Vending Operational and Marketing Program, Chapter 8, Customer Complaints.*

[illegible]



**RESPONSES OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-84.** Are all complaints received by the Postal Service investigated? If not, please explain why all complaints are not investigated. For routine type complaints, such as "I am tired of receiving my neighbors mail," what is involved in researching and resolving the complaint? Include in your response any differences in processing and resolving a complaint that involves (1) a city carrier route and (2) a rural carrier route.

**RESPONSE:**

The Postal Service policy is to address all complaints promptly. See the Management Instruction attached to the response to OCA/USPS-83. Currently, each field office is responsible for handling the complaints it receives. Escalation would be to the District Consumer Affairs Office. There is no difference in how rural or city carrier complaints are handled.

**RESPONSES OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-85. What type of training do Postal Service sales and service employees receive for handling complaints?**

**RESPONSE:**

**Sales and service employees receive Sales and Services Associate Training.**

**For training materials on handling complaints, see, for example, USPS-LR-L-144, modules 24 and 26 in both Volume I (Facilitator's Guide) and Volume II (Associate's Workbook).**

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-86** Please refer to the testimony of witness Maura Robinson (USPS-T-29), Attachments A-F.

- a. In Attachment F, column (2), line (a), there appears the figure, 24.45%, which has a citation to USPS LR-J-60 at page 50. Please provide a cell reference in USPS LR-J-60 at page 50 for this percentage.

**RESPONSE:**

(a) The following calculation can be used to derive the 24.45% figure using data found in USPS LR-J-60, page 50.

$$24.45\% = ( \text{Cells G37} + \text{G41} + \text{G46} + \text{G47} + \text{G51} ) / ( \text{Cells E7} + \text{E18} + \text{E33} )$$

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-89**

- a. In the Outgoing Primary (Auto) operation, for the DBCS equipment, what proportion of the total letter-shaped pieces processed are
  - (1) First-Class letters,
  - (2) First-Class cards,
  - (3) Standard Mail letters,
  - (4) Standard Mail cards.
  
- b. In the 5-Digit Barcode Sort, for the DBCS equipment, what proportion of the total letter-shaped pieces processed are
  - (1) First-Class letters,
  - (2) First-Class cards,
  - (3) Standard Mail letters,
  - (4) Standard Mail cards.
  
- c. In the 5-digit Barcode Sort, for the MPBCS equipment, what proportion of the total letter-shaped mail pieces processed are
  - (1) First-Class letters,
  - (2) First-Class cards,
  - (3) Standard Mail letters,
  - (4) Standard Mail cards.

**RESPONSE:**

Please see the responses to OCA/USPS-39 and 40.

(a) All letters and cards are processed in either a DIOSS or DBCS outgoing primary operation using MODS operation numbers 291 or 891, regardless of the shape and subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

(b) All letters and cards are processed in either a DIOSS or DBCS 5-digit barcode sort operation using MODS operation numbers 293/4/5 or 893/4/5 regardless of the shape and subclass. In addition, these operations numbers are also used nationwide for the incoming managed mail program, incoming SCF, and incoming primary operations. Consequently, the Postal Service does

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**REPONSE TO OCA/USPS-89 (CONTINUED)**

not have disaggregated volume data as requested.

(c) All letters and cards are processed in either a MPBCS or MPBCS-OSS 5-digit barcode sort operation using MODS operation numbers 873/4/5 or 973/4/5, regardless of the shape and subclass. In addition, these operations numbers are also used nationwide for the incoming managed mail program, incoming SCF, and incoming primary operations. Consequently, the Postal Service does not have disaggregated volume data as requested.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-90**

- a. In the Outgoing Primary (Piece) operation, for the AFSM100 Auto equipment, what proportion of the total flat-shaped pieces processed are
  - (1) First-Class flats,
  - (2) Periodicals flats,
  - (3) Standard Mail flats.
  
- b. In the Outgoing Primary (Piece) operation, for the FSM881 Auto equipment, what proportion of the total flat-shaped pieces processed are
  - (1) First-Class flats,
  - (2) Periodicals flats,
  - (3) Standard Mail flats.
  
- c. In the Outgoing Primary (Piece) operation, for the FSM1000 Auto equipment, what proportion of the total flat-shaped pieces processed are
  - (1) First-Class flats,
  - (2) Periodicals flats,
  - (3) Standard Mail flats.

**RESPONSE:**

Please see the responses to OCA/USPS-39 and 40.

(a) All flats classes are processed in an AFSM100 outgoing primary operation using MODS operation number 331, regardless of the subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

(b) All flats classes are processed in a FSM881 outgoing primary operation using MODS operation number 421, regardless of the subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

(c) All flats classes are processed in a FSM1000 outgoing primary operation using MODS operation number 441, regardless of the subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

OCA/USPS-91. Please refer to page 7, lines 13 and 21, of the testimony of witness Thomas Bozzo, USPS-T-14.

- a. Please define the word "plant" as used at line 13.
- b. Please provide a list of plants that meet this definition.
- c. For FYs 1993 through 2001, please provide an inventory of mail processing equipment at each plant listed in response to part b, above.
- d. Please define the word "plant" as used at line 21.
- e. Please provide a list of plants that meet this definition.
- f. For FYs 1993 through 2001, please provide an inventory of mail processing equipment at each plant listed in response to part e, above.
- g. Do witnesses Bozzo and Kingsley use the word "plant" consistently both within and between their testimonies? If not, please identify and define all other uses of the word "plant" and provide responses to parts b-c, above, for each definition.
- h. Who decides how many pieces of each type of mail processing equipment should be placed in a particular plant?
- i. Please provide copies of all instructions or other documents that explain how to determine how many pieces of each type of mail processing equipment should be placed in a plant.

**Response:**

- a. – g. Redirected to witness Bozzo.
- h. The decision is made in consultation between Headquarters Engineering, Headquarters and Area Operations management, and the management of the particular plant.
- i. Each purchase of mail processing equipment involves a separate "requirements call". These calls are developed by Engineering and are unique to each equipment purchase. They generally require justification for the equipment in terms of volume, workhours, operating plan, etc. as appropriate to the purchase,

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

but can be much simpler (e.g. one unit for each plant with a specific type of equipment).



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-92** Please refer to page 29, lines 18-26, of the testimony of witness Linda A. Kingsley, USPS-T-39. Witness Kingsley states:

Each plant must sort mail to a network of other plants, post offices, carrier routes, box sections, large firms, etc. This network is a major determinant of the plant's workload. In conjunction with the characteristics of the mail and the sorting equipment, this network determines the sort schemes that must be spread over the equipment. The work required to service the network can sometimes be distinguished from the work of processing mail volumes. This is seen most dramatically following a rate increase. Volume, and the workload required to process that volume, may decline, but the number of separations required for the network is unaffected.

- a. Do all sort schemes utilize all possible separations on a given piece of equipment? If not, why not?
- b. Are there "marginal" separations in some sort schemes? That is, are there separations with so much or so little volume that an increase or decrease in volume for those separations would lead to creation or consolidation of separations? If not, why not?
- c. Who creates sort schemes for a particular plant?
- d. Please provide copies of all instructions or other documents that explain how to create sort schemes.
- e. Are there "marginal" stackers on some bar code sorters? That is, are there stackers with so much or so little volume that an increase or decrease in volume for those stackers would lead to one more or one less tray's being generated by those stackers for a particular run? If not, why not?
- f. Please provide copies of all instructions or other documents that explain how to sweep stackers.

**Response:**

- a. No. However, on primary schemes, all separations would be used. On secondary schemes, both outgoing and incoming, the count of separations required to service the network generally will not match the number of stackers available. Holdouts for recipients of large volumes of mail (i.e. "firms") may be established to utilize some of the excess stackers, but this possibility is generally quite limited and inadequate to exhaust the available stackers. Similarly, in Delivery Point

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

Sequencing (DPS) schemes, the number of carrier routes and delivery points for the scheme are the drivers of stacker utilization and will not generally match the number of stackers on the sorter.

- b. Yes. For example, there are seasonal separations associated with "snowbirds", income taxes, etc., and occasional separations to support foreign wars and other special requirements.
- c. See response to OCA/USPS-48g.
- d. See response to OCA/USPS-48g.
- e. Yes. The normal variation in day-to-day mail volume would cause some variation in the number of trays produced by many stackers, especially in primary schemes. However, many stackers required to service the network consistently produce less than one tray.
- f. Copies of the pages with sweeping instructions from various manuals are attached. These extracts cover the FSM 1000, FSM 881, DBCS, SPBS, and AFCS.

<b>USPS</b>	<b>WORK INSTRUCTION</b>	<b>W#</b>	<b>Revision #</b>	<b>Process Owner:</b>
	<b>AFSM 100</b>	<b>W-AF567</b>	<b>0</b>	<b>Manager,</b>
	<b>SWEEPER OPERATIONS</b>			<b>Processing</b>
				<b>Operations</b>

- 1) **PURPOSE:** To effectively sweep the AFSM 100 so as to optimize its productivity.
- 2) **SCOPE:** All personnel performing or supervising sweep operations in standardized AFSM 100 processes.

3) **PERFORMANCE METRICS:**

<b>PERFORMANCE CATEGORIES</b>	<b>PERFORMANCE TARGETS</b>
Changeover duration:	9 minutes max. OCR mode

4) **WORK INSTRUCTION CONTENT:**

Perform the following Activities:

- Obtain labels from label station and place them into appropriate slots above the flat trays (verify label and stacker numbers match).
- Ensure there is a flat tray at every discharge chute (and that each is properly labeled).
- Remove full mail trays, place on takeaway conveyor (avoid pulling trays that are less than two thirds full). An amber light will flash above flat tray indicating when it is full. Failure to remove the full tray will have a negative impact on productivity and throughput since the mail will recirculate until full tray is pulled.
- Immediately replace swept tray with a correctly labeled empty tray.

**NOTE:** The status indicator light stays solidly lit when a tray is removed until it is replaced. Mail will recycle in the machine until the tray is replaced or it times out. Throughput is affected when excessive time is used to remove/replace full trays.

- A full sweep at the end of the run should take a maximum of 9 minutes (OCR mode).
- Replenish labels from label station as necessary.
- Notify supervisor if label stock at label station needs replenishing.
- Remove all mail piece jams on the AFSM 100 per W-AF125.

**CHANGEOVER:** Performed per W-AF124, "AFSM 100 End of Run/Sort program Changeover"

these trays without disrupting the movement or rhythm of the keyer.

#### 581.324 Riffing

Riffle mail during loading to identify mail that runs (all for one separation or ZIP Code). Remove this mail and send it to manual cases or the tie out area to be bound and dispatched to prevent feeding mail that is stuck together.

#### 581.4 Mail Supply (Utility Cart/Truck, Etc.)

Place mail supplies to minimize walking. Place at least one supply truck close to Consoles #1 and #2, and Consoles #3 and #4. Keep the loading aisle narrow. Aisles three feet wide allow for safe movement and keep travel distance short.

#### 581.5 Sweeper Duties

##### 581.51 Bins

Withdraw and verify mail from the bins, as scheduled. Empty full bins immediately. Avoid premature (uneconomical) sweeping, except when dispatches are necessary. Check low-density bins periodically. Verify designated separations; remove errors and uncanceled mail. Properly prepare errors removed for further distribution. If excessive errors are detected, advise the supervisor immediately.

##### 581.52 Trays

FSM 881 trays are designed for quick removal. When a tray is full, replace it with an empty one. Take the full tray to the transfer point or dispatch area. Stack trays prepared for dispatch properly to prevent their falling from transport equipment. Use approved and safe techniques. The sweeper is responsible for labelling trays as they are replaced.

#### 581.6 Clearing Jams

Follow the procedures below to clear jams:

- Set the emergency stop button prior to entering the machine area to clear a jam. Most jams are cleared by sweepers unless occurring in the feeder section. When a jam occurs, the pusher finger pivots in the opposite direction to the transport belt travel.
- Return the pusher finger to the original position by removing the object causing the jam. To remove a mailpiece without damaging it, it is advisable to move the piece in a backward direction, allowing any part caught on the finger to slide off. A

jerk motion forward or straight up may cause additional damage.

- Reset the EMERGENCY STOP button.
- Give the all clear signal for restart.

#### 581.61 Feeder Section

##### 581.611 Locating the Jam

Jams occur in the feeder section when a piece obstructs finger travel soon after insertion. Often, these happen in the area of the feed station immediately in front of the operator who keyed the piece. As a jam occurs, the red light on top of the machine directly opposite the keyer lights up. A jam is sometimes accompanied by an audible snap as the pusher finger pivots. This also helps to locate the jam area, as the red light goes out if the jam clears itself.

##### 581.612 Clearing the Jam

To clear the jam:

- Push the EMERGENCY STOP.
- Lift the blue doors of the induction station where the jam is located.
- If the jammed flat is accessible, remove it. If the jam is directly behind the feeder assembly, swing out the feeder assembly and remove the flat.
- Swing the feeder assembly back into place, if necessary.
- Close the blue doors.
- Reset the EMERGENCY STOP button.
- Give the all clear signal for restart.

#### 581.62 Bins Section

##### 581.621 Locating the Jam

Most bin section jams occur at Bins #1 and #51 due to a change in the angle of the deflection from the feeder sections. Clear the jam by releasing the obstructed pusher finger. Use slightly backward sliding motion to prevent damage to the mailpiece.

##### 581.622 Clearing the Jam

To clear the jam:

- Set the EMERGENCY STOP.
- Remove the bin closest to the jam.
- Step into the vacated bin area.
- With the left hand, relieve the pressure by pulling the pusher finger to the left.
- With the right hand, remove the flat.
- Replace the pusher finger without letting it snap.
- Safely step out of the bin area and replace the bin.

in the feeder), the system will not know there is another flat in the feeder. In this case, the operator may notice that the system didn't induct the mailpiece (the system doesn't know it's there) and wonder what the problem is. In early testing, operators learned to momentarily block the sensors to cause the system to induct the mailpiece. This action will work and will cause the "short" mailpiece to be inducted correctly assuming the keycode was correctly entered. If the short mailpiece isn't noticed, the operator will likely key the next mailpiece and slide it in on top of the existing piece, causing both to go to the same destination.

The problems associated with dropping too soon (before the first flat has cleared the feeder and the feeder belt has stopped) can be alleviated by using the READY lamp on the operator control panel as a visual cue. This lamp indicates that the feeder is ready to accept the next mailpiece. It is especially important to use this cue when operators are unfamiliar with the FSM 1000. As they become more experienced, they will get in synch with the system and rely less on the visual cues provided by the operator indicator panel.

### 3.7 SWEEPING MAIL

Sweeping is a manual function that personnel are required to perform during machine operation. The sweeping function ensures that empty tubs are placed at the machine outputs and that the full tubs are removed from the work area.

Mail sweeping is facilitated by two Takeaway Conveyor systems (one on each side of the machine) which operate independent of each other. The Takeaway Conveyor system is a set of conveyors under the Dual Chutes that runs the entire length of the Output Units. A Beam Of Light (BOL) is mounted to detect when a tub is placed onto the conveyor. This BOL projects down the entire length of the Output Units. There is a separate BOL and Takeaway Conveyor for each side of the machine. The BOL is interrupted when a tub is pushed onto the Takeaway Conveyor. When the BOL is interrupted, the conveyor belt stops. A few seconds after the full tub is fully placed on the belt and the beam is cleared, the conveyor system will activate and run for the time necessary to take the full tub to the end of the machine, up the Incline Conveyor, and onto the gravity Skatewheel Conveyor. At the end of the conveyor system, another conveyor (Incline Takeaway Conveyor) moves the tubs up to an expandable Skatewheel Conveyor. A BOL mounted at the top of the Incline Conveyor is used to detect when the Skatewheel Conveyor is full. The Skatewheel Conveyor can hold approximately 14 tubs in its fully expanded configuration.

The Incline Takeaway Conveyor has an E-STOP push-button for safety. Both of the Incline Takeaway Conveyors have a post with a red lamp and a blue lamp. The red lamp indicates that the Incline Conveyor E-STOP switch was activated. The blue lamp indicates the Skatewheel Conveyor is full. When the Skatewheel Conveyor is full because of a blocked BOL, the Takeaway Conveyor is prevented from bringing more full tubs to the Incline Conveyor. Therefore, the Skatewheel Conveyor should be kept clear to ensure that the Takeaway Conveyor is not prevented from movement as necessary to accept full tubs.

**WARNING**

Do not reach into the main transport path (e.g., clearing out foreign objects or a jammed mailpiece) while the machine is running.

Sweeping responsibilities include the following:

1. Load pre-printed destination labels into the Label Holders by matching the label text to the LCD Display text.
2. Visually check output chutes and tubs to ensure no mail buildup occurs.
3. Respond timely to output tubs requiring service by visually checking to see if they are full.
4. Remove and replace tubs when full. You should perform this when the tubs contain mail which is near the bottom of the tub handles openings. Do not let mail stack up to the point where it is to the top of the tub.
  - a. Have an empty tub ready and attach a destination label.
  - b. When there is a sufficient opening for a tub on the Takeaway Conveyor belt, move the full tub forward onto the automated Takeaway Conveyor by pushing firmly on the empty tub located behind it. If an empty tub is not present, a direct push on the rear of the full tub may be necessary.
  - c. Replace the vacated spot with an empty labeled tub.
5. Verify the tub follows the Takeaway Conveyor up the Incline conveyor to the Skatewheel Conveyor by occasionally monitoring its movement along the conveyor.
6. Prevent the tubs from blocking the Incline Takeaway Conveyor BOL by promptly removing the full tubs from the Skatewheel Conveyor. (A blocked BOL prevents the Takeaway Conveyor system from operating.)

At the completion of a run, clear the system (by pushing tubs onto the conveyor) of partially full tubs starting at the Incline Conveyor end of the system. This will prevent interference with tubs coming down the Takeaway Conveyor.

**NOTE**

Proper orientation of mail stacks on the conveyor is considered a shared responsibility of the keyer and loader. Although it is important that mail stacks be oriented correctly, the loader cannot neglect his/her other duties. Therefore, the keyer may at times have to orient the stacks.

**Step 4. Keying/Feeding**

- Keycode mail using the keying methods demonstrated by your instructor.
- Ensure that you practice the use of the ENTER key (2-digit on FSM 881) function. Your instructor will check to make sure you understand this function.
- Use the correct feeding rules:
  - Seam Down
  - Fold Forward
  - Long Side Down
- Clear jams if they occur.

**Step 5. Sweeping**

- Watch for "full" tubs (your instructor may ask you to sweep the mail before they are actually full).
- Ensure the tubs are properly positioned on the Takeaway Conveyor.
- Ensure labeled empty tubs are placed in position.
- Clear jams if they occur.

**Step 6. Jam Clearing and Emergency Stop**

Each student will perform the procedure to clear a jam in the output area and at the Input station. Also, the instructor will ask each student to perform an Emergency Stop while this exercise is being performed. If you did not have an opportunity to perform jam clearing during your practice, ask your instructor to create (or simulate) a jam for you.

### 3.3 SWEEPING OF MAIL RECEPTACLES

The information in this section describes the general functions and operations to be performed by the sweep attendant. Sweeping involves the physical act of replacing a mail container that has reached its preset weight limit (full) with an empty container. (Maximum weight limits for each output bin are defined as part of the sort plan generation at initial startup.)

#### 3.3.1 CONDITIONS REQUIRING SWEEPING

- Full trays – by weight (visual/audio aids)
- Full sacks – by weight (visual/audio aids)
- Full sacks – by volume (no aids provided; visual observation required)
- Full wiretainers – by volume (no aids provided; visual observation required)
- Full wiretainers – by weight (visual/audio aids)
- Full U-carts – by weight (visual/audio aids)
- Full U-carts – by volume (no aids provided; visual observation required)
- Full reject bin container (no aids provided; visual observation required)
- Full overflow container (no aids provided; visual observation required)

**WARNING**

To prevent personal injury, sweeping of overflow container (located inside rear of Drive Module) is performed only while main drive chain is not running.

#### 3.3.2 SWEEPING AIDS

- Bin Full Indicator – an indicator located on top of the output control arm assembly.
  - Light On – container has reached 75% of weight limit and must be replaced (swept). Mail will continue to be sorted to bin until weight limit is reached.
  - Flashing Light (accompanied by a momentary audio alarm) – container has reached 98 to 100% of its weight limit and requires immediate replacement. Mailpieces will continue to be sorted to bin if the addition of the mailpieces does not put the container over 100% of its weight limit. Mailpieces will then be diverted to the reject bin.
- SWEEP Button/Indicators (left and right) – located on output control arm assembly.
  - When button is pressed once, SWEEP indicator lights (amber) and Bin Full indicator light flashes (red) to indicate a bin full condition and sweeping operation in progress. Mail is now diverted to the reject bin while container is being exchanged. SWEEP button must be pressed again after container is exchanged to allow sorting to bin.
  - When button is pressed again, the SWEEP and Bin Full indicators will go out. Mail will resume sorting to the associated bin.



SPBS P2 of 2

Attachment to OCA/USPS-929<sup>3206</sup>  
P7 of 11

### 3.3.3 SWEEPING OPERATIONS

Sweep attendant responsibilities are as follows:

- Quickly respond to output bins requiring service, as indicated by audio and visual alarms.
- Visually check output chutes and containers to ensure no mail buildup occurs.
- Visually scan all output receptacles. Remove and replace when full.

The sweeping procedure for replacing all of the output container types is basically the same, as follows:

1. Replace as dictated by audio/visual alarms.
2. Replace as a result of dispatch schedules.
3. Replace as a result of visual observation of container full condition.
4. On output control arm assembly, press appropriate SWEEP button (left or right). SWEEP indicator will light. (Mail is diverted to reject bin.)
5. Remove full container. Replace with empty container.
6. Press SWEEP button a second time to clear bin weight to zero and allow sorting of mail to associated output bin. SWEEP indicator and Bin Full indicator will go off.

### Duties, Responsibilities

1. Feet spread comfortably to give balance and stability.
2. Knees bent and back straight, "nearly" vertical.
3. Keep head upright and moving freely to assist in maintaining balance.
4. When raising up, keep the back straight.
5. If turning is necessary, use the feet as a pivot point. Do not twist the body trunk.

~~If necessary, use the steps on the machine to assist you in~~  
~~reaching the upper stackers.~~ Do not use the steps to walk the length of the DBCS because this is an unsafe procedure. Always remember to return the steps to the upright position once the upper stacker has been swept.

When sweeping a second pass sort, use the same procedure as those just reviewed. Remember that keeping your mail in sequential order is critical to the success of the DPS operation.

### **Staging Methods**


#### **First Pass**

The method of staging processed mail on the first pass is directly related to the type of tray racks utilized on the DBCS.

attachment to OCA/USPS-929  
Pg of 11

#### Duties, Responsibilities

6. Place the mail into the proper mail tray with both hands. The mail must be placed into the trays with the addresses facing away from the DBCS machine.
7. Place new mail in the trays behind the existing pieces being careful to keep the mail in proper sequence for the carriers.
8. Place full trays in the appropriate container for subsequent processing or dispatch.
9. Press the label print button, slide the label in the new tray and place it on the tray support equipment.
10. Monitor the stacker indicators for faults. When a fault indicator lights up, the SMP should follow the TOPS/OSRM corrective procedures.
11. Monitor the stacker indicators for jams. A jam light comes on to indicate a jam in the same stacker module. The loader should assist the sweeper in identifying the location of a jam as well as full stackers by using the status line on the DBCS computer monitor.



~~When sweeping mail from lower stacker levels, always use proper bending techniques. Proper bending techniques are as follows:~~

Attachment to OCA/USPS - 747  
P 10 of 11

### Duties, Responsibilities

Check all stackers frequently and remove the mail before the 75% indicator light flashes. As the sweeper gains experience it will become evident when a stacker should be swept.

1. Position yourself in front of a stacker that is close to 60% full. Mail in the stacker will have the address facing the sweeper.

2. Pull out the proper shelf on the 1226F tray cart. Only extend the shelf drawer out as far as needed to place the mail in the tray. The shelf does NOT need to be fully extended.

3. Raise the stacker paddle with your right hand using the hole in the paddle. Support the mail with your left hand to prevent it from tilting.

4. Reinsert the paddle into the stack of mail near the mail guide. Leave 2 inches of mail at all times when sweeping the stackers, except at dispatch time. This is a necessary safety precaution. Do not completely empty a stacker when the machine transport belts are moving.

5. Remove the mail using your left hand to support the front of the mail and your right hand from in front of the paddle. Turn by moving your feet, not just rotating your body.

## Duties, Responsibilities

### SWEEPING PROCEDURES FOR THE DBCS

The primary activity of the sweeper is to clear mail from the stackers and place them into trays. Generally, stacker modules will be arranged so that the highest density stackers are grouped together. These high density stackers are usually located near the read reject stacker (customary stacker #1). Stacker density generally decreases the farther away they are from stacker #1. This arrangement allows the sweeper to spend the majority of their time in front of a limited number of stackers while the DBCS is processing mail.

When an individual stacker reaches 75% capacity, a full warning light will flash. Mail will continue to be sent to this stacker. When the stacker has filled completely the light stops flashing and remains on and an audible alarm will sound. Depending upon the sort program options, mail destined for a full stacker may be directed to a bypass stacker or to the last stacker. If processing mail for the second pass of a two pass sort plan, the DBCS will stop processing mail. If any of the mechanical reject stackers become full the DBCS will stop processing mail. At such times, the machine will go into an idle mode and can be re-started when the full stacker has been emptied.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

OCA/USPS-93. Please refer to page 47, lines 6-8, of the testimony of witness A. Thomas Bozzo, USPS-T-14. Witness Bozzo states:

Manual operations serve as "backstops" to automation to deal with machine rejects and machine capacity shortfalls

- a. Please define the term "backstops."
- b. Please define the term "capacity shortfalls."
- c. Does the Postal Service use manual operations to deal with machine breakdowns?
- d. Does the Postal Service use manual operations to deal with unexpectedly large volumes?
- e. How does the Postal Service meet critical dispatches when there is a "capacity shortfall"?
- f. What are the operational consequences of a failure to meet a critical dispatch?
- g. What are the consequences for managers or supervisors who fail to meet a critical dispatch?
- h. What are the financial consequences to the Postal Service of a failure to meet a critical dispatch?
- i. Please provide copies of all instructions or other documents that explain to managers or supervisors how to meet critical dispatches in the event of a "capacity shortfall" or unexpectedly large volumes.
- j. Please provide copies of all instructions or other documents that explain to managers or supervisors how to plan for a "capacity shortfall" or unexpectedly large volumes.

**Response:**

- a. Redirected to witness Bozzo.
- b. Redirected to witness Bozzo.
- c. They may on rare occasions. However, this would be very unusual for machinable mail processed in a facility where appropriate sorting machines are available because the mail would be diverted from the automation mail stream into more expensive manual processing for all subsequent operations. Instead,

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

the mail would be run on another machine or run late after the breakdown is repaired.

- d. Certainly for unexpectedly large volumes of non-machinable mail. However, it would be unusual for machinable mail to be diverted to manual operations for the reason explained in part c above.
- e. Mail might be diverted from a plant with a capacity shortfall to another plant. Within a single plant, every alternative that is both effective and not cost-prohibitive would be employed. For example, large Christmas cards are sometimes processed on a flat sorter.
- f. Mail may not make the critical entry time at the destination, but still may be delivered on time. For example, it may meet a later truck or plane and still reach the destination (delivery unit or plant) in time for delivery within the service standards.
- g. Disciplinary action may be taken if, in the opinion of their manager, the failures occur without adequate reason.
- h. Facilities may incur additional costs for overtime or extra transportation to compensate for the failure.
- i. Contingency plans are developed individually by each facility and are not available at the national level.
- j. A copy of the Contingency Plan section from the AFSM 100 Support Guide is attached. We are not aware of any other documents on developing a contingency plan. Development of a Contingency Plan is a normal part of on-the-job training at individual plants.

**Other Support Activities****AFSM 100 SUPPORT GUIDE****14.4 CONTINGENCY PLANS**

In-Plant Support, in conjunction with other functional groups, must develop and coordinate contingency plans in the event of a situation that prevents the AFSM 100(s) from processing all the volume normally scheduled for AFSM processing.

It is highly unlikely that the entire AFSM 100 will be inoperable for any length of time outside of its normally planned maintenance windows. A more likely scenario that may force a facility to implement their contingency plan is either an AFSM Feeder or OCR malfunctioning, resulting in the machine working at less than full capacity. Another possible scenario is an unexpected heavy volume period that exceeds the plant's automation capacity during a specific processing window.

If the event is caused by an equipment malfunction, make sure the proper maintenance personnel are contacted immediately and determine as soon as possible what the estimated time will be to correct the problem.

A contingency plan must include a priority list of the types of mail that must remain on the AFSM 100 when the operational capacity is reduced unexpectedly. Also, when processing several different types of mail simultaneously using different sortplans, the contingency plan must spell out for the supervisors which AFSM 100 mail they would initially migrate from the AFSM 100 to another operation.

This targeted mailstream would either flow to another processing operation, or as a last resort processed at a later time, possibly on an available AFSM 100. Generally, the order of removing or migrating mail from the AFSM should be the following:

- ◆ Standard A
- Periodicals
- ◆ Newspapers
- First Class (undated)
- First Class (metered)
- First Class (stamp)

When flowing the targeted mailstream to an alternative operation, the order of preference should be FMOCR, FSM 1000 BCR, FSM 1000 Keying, and Manual. The objective is to move this mail to the least costly operation available while minimizing the affect on service.

If the unforeseen event affecting AFSM capacity occurs during Tour 1 operations, when most of the mail processed is First Class Incoming Secondaries, the contingency plan must clearly prioritize a list of those zones and sortplans that will be affected. The plan must specify where these zones will be processed (distribution operation, Function 1 or Function 4), when they will be processed and at what cost (use Cost Comparison Model to determine costs). This segment of the plan must be closely and carefully coordinated with Delivery Operations, other plant operations, and Transportation, if scheduling of trips are affected by the plan. Again, when considering strategy options, ensure the option chosen is the least costly option available and has the least affect on meeting service standards.

In order for contingency planning to work effectively, all functional areas affected by the event that triggered the contingency, must be notified immediately. The plan must include a list of contact names that must be notified.



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-95.** For FYs 1999, 2000, 2001, and 2002, please identify the PQs and APs that had the highest and lowest volume of

- a. cards and letter-shaped pieces
- b. flat shaped pieces
- c. nonletter/nonflat-shaped pieces.

**RESPONSE:**

No data are available for FY 2002.

**Cards and letter-shaped pieces**

**HIGH VOLUMES**

1999 AP 5 11,256 million (M) pieces  
2000 AP 7 12,210M  
2001 AP 2 11,983M

1999 PQ 4 40,964M  
2000 PQ 4 42,025M  
2001 PQ 4 43,844M

**LOW VOLUMES**

1999 AP 13 10,018M  
2000 AP 11 10,088M  
2001 AP 13 10,638M

1999 PQ 3 32,730M  
2000 PQ 2 34,073M  
2001 PQ 3 35,046M

**Flat shaped pieces**

**HIGH VOLUMES**

1999 AP 2 3,818M  
2000 AP 2 4,029M  
2001 AP 2 4,466M

1999 PQ 4 12,758M  
2000 PQ 4 13,369M  
2001 PQ 4 13,418M

**LOW VOLUMES**

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

1999 AP 4 2,651M  
2000 AP 4 2,924M  
2001 AP 4 3,043M

1999 PQ 2 9,178M  
2000 PQ 2 9,831M  
2001 PQ 2 10,373M

Nonletter/nonflat-shaped pieces

HIGH VOLUMES

1999 AP 4 285M  
2000 AP 4 315M  
2001 AP 4 326M

1999 PQ 4 1,001M  
2000 PQ 4 913M  
2001 PQ 4 902M

LOW VOLUMES

1999 AP 11 233M  
2000 AP 11 220M  
2001 AP 13 217M

1999 PQ 3 753M  
2000 PQ 3 749M  
2001 PQ 3 725M

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA.USPS-96.** For FYs 1999, 2000, 2001, and 2002, for the PQs and APs identified in the previous interrogatory [OCA/USPS-95], please provide the high or low volume of

- a. cards and letter-shaped pieces
- b. flat shaped pieces
- c. nonletter/nonflat-shaped pieces.

**RESPONSE:**

See the response to OCA/USPS-95.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-97.**      Former Postmaster General Henderson spoke of the desirability of the Postal Service's offering seasonal rates.

- a.      Please describe all operational benefits that would accrue to the Postal Service from offering seasonal rates or discounts.
- b.      Please describe all operational benefits that would accrue to the Postal Service from offering peak-load rates or discounts.
- c.      Please describe all operational benefits that would accrue to the Postal Service from offering time-of-day rates or discounts.

**RESPONSE:**

a.-c. Differential seasonal, off-peak, and time-of-day rates have apparently proven beneficial in other industries, especially in industries (e.g., airlines, electric utilities) where the product or service cannot be inventoried but must be produced more-or-less simultaneously with its consumption.

Since the Postal Service has similar types of variation in the demand for its services, it is plausible that it too might find one or more of these differential pricing approaches beneficial. No study, however, has attempted to list the qualitative pros and cons, much less develop lists of "all operational benefits," or possible disadvantages. Presumably, each individual proposal would have costs and benefits that would be specific to that particular proposal.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-98** Please describe how the Postal Service monitors mail on hand in plants and delivery units. Please provide copies of all instructions or other documents that describe the reporting or monitoring of mail on hand. Please provide blank copies of all forms used for or generated from the reporting or monitoring of mail on hand.

**Response:**

The Postal Service uses electronic reporting systems to monitor mail on hand: the Mail Condition Reporting System (MCRS) for plants and the Customer Services Daily Reporting System (CSDRS) for delivery units. Manuals describing these systems and containing blank forms are provided in Microsoft Word format on a diskette as USPS-LR-J-153. The MCRS manual is also zipped.

---

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES**

**OCA/USPS-100.** The following table comes from information provided by the USPS in response to DFC/USPS-5 and DFC/USPS-6.

**Priority and First-Class Single Piece Rate Mail - ODIS**

FY	Service Std	Mail Category	Percent Mail Delivered w/in Given Std	Avg Days to Delivery		Mail Category	Percent Mail Delivered w/in Given Std	Avg Days to Delivery
1999	Overnight	Priority	85	1.2		SP 1 <sup>st</sup> Class	93	1.1
2000	Overnight	Priority	84	1.3		SP 1 <sup>st</sup> Class	92	1.1
2001	Overnight	Priority	82	1.3		SP 1 <sup>st</sup> Class	91	1.1
1999	Two-Day	Priority	74	2.3		SP 1 <sup>st</sup> Class	87	2.0
2000	Two-Day	Priority	72	2.4		SP 1 <sup>st</sup> Class	86	2.0
2001	Two-Day	Priority	68	2.5		SP 1 <sup>st</sup> Class	84	2.0
1999	Three-Day	Priority	76	3.0		SP 1 <sup>st</sup> Class	85	2.8
2000	Three-Day	Priority	70	3.2		SP 1 <sup>st</sup> Class	83	2.8
2001	Three-Day	Priority	67	3.4		SP 1 <sup>st</sup> Class	79	3.0

(a) Please confirm that the percentage of mail delivered within the given standard for Overnight Priority Mail has declined from 1999 to 2001 (e.g., FY 1999 - 85% versus FY 2001 - 82%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(b) Please confirm that the percentage of mail delivered within the given standard for Overnight First-Class Single Piece Mail has declined from 1999 to 2001 (e.g., FY 1999 - 93% versus FY 2001 - 91%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(c) Please confirm that the percentage of mail delivered within the given standard for two-day Priority Mail has declined from 1999 to 2001 (e.g., FY 1999 - 74% versus FY 2001 - 68%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(d) Please confirm that the percentage of mail delivered within the given standard for two-day First-Class Single Piece Mail has declined from 1999 to 2001 (e.g., FY 1999 - 87% versus FY 2001 - 84%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(e) Please confirm that the percentage of mail delivered within the given standard for three-day Priority Mail has declined from 1999 to 2001 (e.g., FY 1999 - 76%

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES

3220

versus FY 2001 - 67%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(f) Please confirm that the percentage of mail delivered within the given standard for three-day First-Class Single Piece Mail has declined from 1999 to 2001 (e.g., FY 1999 - 85% versus FY 2001 - 79%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(g) Please confirm that a comparison of the average days to deliver overnight mail indicates that for FY 1999 to FY 2001, First-Class Mail takes less time than does Priority Mail (e.g., FY 2001: First-Class SP - 1.1 versus Priority - 1.3 days). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(h) Please confirm that a comparison of the average days to deliver two-day mail indicates that for FY 1999 to FY 2001, First-Class Mail takes less time than does Priority Mail (e.g., FY 2001: First-Class SP - 2.0 versus Priority - 2.5 days). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(i) Please confirm that a comparison of the average days to deliver three-day mail indicates that for FY 1999 to FY 2001, First-Class Mail takes less time than does Priority Mail (e.g., FY 2001: First-Class SP - 3.0 versus Priority - 3.4 days)? If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

(j) Please provide copies of all studies, reports and/or analyses performed on the reasons why postal patrons choose Priority Mail, paying more to mail a mail piece weighing up to 13 oz. as Priority Mail (up to 1 lb. = \$3.50), as opposed to mailing the same item at the lower First-Class Single Piece rate (13 oz. = \$3.10 (\$0.34 +(12\*\$0.23))).

**RESPONSE:**

- (a) Confirmed.
- (b) Confirmed.
- (c) Confirmed.
- (d) Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES

3221

- (e) Confirmed.
- (f) Confirmed.
- (g) Not confirmed. The average-days-to-delivery statistics reflect not only delivery performance, but also origin-destination characteristics, which differ for First-Class Mail and Priority Mail. It cannot be concluded from the average-days-to-delivery statistics that First-Class Mail necessarily "takes less time" to deliver than Priority Mail with similar origin-destination characteristics.
- (h) Not confirmed. See response to part (g).
- (i) Not confirmed. See response to part (g).
- (j) The Postal Service is not aware of any studies, reports and/or analyses performed on the reasons why postal patrons choose Priority Mail when single-piece First-Class Mail is an alternative. However, see the Postal Service's response to OCA/USPS-80 for some advantages that Priority Mail has over First-Class Mail.



RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-101. Parts of the following interrogatory were asked of USPS witness Mayo as OCA/USPS-T36-7. She responded that she was not aware of any processing centers with scanners that are not compatible with the signature capture program. The object of this interrogatory is to determine if the Postal Service has in its possession information of which witness Mayo was unaware. Therefore, please refer to an advisory report issued May 2, 2001 regarding Certified Mail Observations at the Los Angeles Processing and Distribution Center (Report Number AC-MA-01-002).

Nov 9 4 33 PM '01  
U.S. POSTAL RATE COMMISSION  
THE SECRETARY

(a) Please identify each and every Processing and Distribution Center (P&DC) that has scanning equipment that is not compatible with the Signature Capture Program. Include in your response the volume of Certified Mail impacted by the lack of compatible scanning equipment during FY 2000 and FY 2001. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

(b) For each P&DC that employs the old scanning equipment identified in part "a" of this interrogatory, please explain whether or not the P&DC currently participates in the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

(c) Referring to part "b" of this interrogatory, for each and every P&DC that does not currently participate in the Signature Capture Program, please identify: (1) when the problem of incompatible equipment links with the national database will be resolved, and (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

(d) Please identify each and every non-P&DC Postal Service unit or facility that currently handles Certified Mail and uses the "old scanning equipment" that is incompatible with the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each reference used if one has not been previously filed in this docket.

(e) For each non-P&DC that employs the old scanning equipment identified in part "d" this interrogatory, please explain whether or not the non-P&DC currently participates in the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-101, Page 2 of 2

(f) Referring to part "e" of this interrogatory, for each and every non-P&DC that does not currently participate in the Signature Capture Program, please identify: (1) when the problem of incompatible equipment links with the national database will be resolved, and (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

(g) For each year, FY 2000 and FY 2001, please provide: (1) the number of Certified Mail transactions in which "old scanning equipment" was used; (2) the percentage of Certified Mail transactions in which "old scanning equipment" was used; and (3) information sufficient to show the revenue impact of using the "old scanning equipment" that was not linked to the national database. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

**RESPONSE:**

(a) The problem discussed in the audit report was not the lack of compatible scanning equipment, but rather the use of old scanning equipment instead of compatible equipment that was also available. An estimate of how much certified mail was impacted by the use of the old equipment is not available, but no certified mail was impacted by the lack of compatible equipment.

All P&DCs have compatible scanning equipment. For example, the facility studied in the audit report has two print workstations and now uses them daily for the signature capture program. Some P&DCs may also have the other scanning equipment for use in non-signature-capture functions. See page 4 of the audit report attached to the response to interrogatory DFC/USPS-2, which notes that the old equipment may be used for Registry dispatch functions.



RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-101, Page 2 of 2

- (b) All P&DCs that deliver mail participate in the signature capture program, and have compatible equipment. They may continue to use other scanning equipment for non-signature-capture functions.
- (c) Not applicable. See parts a and b.
- (d) All non-P&DC sites are using compatible scanning equipment for the signature capture program. Some of these facilities might also use other scanning equipment for non-signature-capture functions.
- (e) All U.S. delivery locations, including Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands, participate in the signature capture program.
- (f) Not applicable. See parts d and e.
- (g) This information is not available.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-102.** For each of the past three years and for each category or type of Express Mail for which the Postal Service collects data, please provide nationwide data from ODIS, EMRS, and any other applicable systems showing:

- (a) The percentage of the time mail is delivered within the number of days specified by the applicable service standard;
- (b) The average number of days to delivery; and
- (c) The full calculation for each figure requested in parts "a" and "b" of this interrogatory including a description of what each figure used in the calculation represents. Please provide cites to source documents for all figures presented in calculations and provide copies of the document if one has not been previously filed in this docket.

**RESPONSE:**

ODIS does not collect information about Express Mail. With respect to

**EMRS:**

- (a) Please see response to DFC/USPS-12.
- (b) The Postal Service does not collect this information.
- (c) Not applicable.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-103.** For each of the past three years and for each category or type of (a) Express Mail, (b) Priority Mail and c) First-Class single piece letters, please provide nationwide data from ODIS, EMRS, EXFC and any other applicable systems showing the amount of mail delivered beyond of the number of days specified by the applicable service standard. Please provide the frequency - volume, percentage and average - for mail delivered within 1 to 15 days after the applicable service standard, broken out for each of the fifteen days. In your response, please include the full calculation for each figure requested including a description of what each figure used in the calculation represents. *Please provide* cites to source documents for all figures presented in calculations and provide copies of any documents that have not been previously filed in this docket.

**RESPONSE:**

(a) The Postal Service does not collect this type of information.

(b)-(c): For the ODIS-based frequency and percentage of Priority mail delivered within 1 to 15 days under the applicable service standard please see the attachment "OCA/USPS-103-Priority" (Attachment A). For the ODIS-based frequency and percentage of First-Class single piece letters delivered within 1 to 15 days under the applicable service standard please see the attachment "OCA/USPS-103-First-Class" (Attachment B).

For the volumes of this mail and the elements needed to produce a full calculation for each figure also see the attachments "OCA/USPS-103-Priority" and "OCA/USPS-103-First-Class." All volumes are what are referred to as "known delivery day" volume. This is mail for which delivery days can be computed, i.e., the postmark date can be read, and the recorded postmark date antedates the ODIS sampling date by less than 30 days. Total volume with known delivery days by service standard is given in the first column of the volume section of the attachment. Volume delivered within the given number of days follows the total. The percentage of volume delivered within a given

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3227

number of days is calculated by dividing the volume delivered within a given number of days by total known delivery day volume, and converting to a percent basis. All data are obtained from ad hoc SAS programming jobs applied to ODIS data tapes. Information on the ODIS system and how it calculates service performance can be found in USPS-LR-J-141.

For similar information reported by the PETE and EXFC systems, see Attachment C to this response. The service performance reports for EXFC provide a metric for measuring on-time performance. For each origin performance cluster/destination performance cluster/service standard combination in EXFC, the following formula to calculate scores is used:

Percent of mail delivered within x days = (# of test pieces delivered within x days) / (total # of test pieces received), where x ranges from 1 to 5.

Example:

Suppose there were ten pieces that traveled from Atlanta to Boston with a two-day service standard. Suppose further that five pieces arrived exactly in two days, three pieces were exactly one day late, one piece was exactly two days late, and one piece was exactly three days late.

Then the profile scores for Atlanta to Boston would be:

Percent delivered within 1 day =  $0/10 = 0\%$   
Percent delivered within 2 days =  $5/10 = 50\%$   
Percent delivered within 3 days =  $8/10 = 80\%$

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3228

Percent delivered within 4 days =  $9/10 = 90\%$

Percent delivered within 5 days =  $10/10 = 100\%$

To calculate a national estimate of the percent of mail delivered within 1 to 5 days for each service standard, a weighted average of the individual origin/destination/service standard scores within that service standard is taken. The weights are calculated at an origin/destination/service standard level from the ODIS average daily volumes for the previous three fiscal years.

Attachment OCA/USPS-103-  
Priority FY 2001

	PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT		82	95	97	99	99
TWO-DAY		10	68	87	94	97
THREE-DAY		3	34	67	84	92
	KNOWN DEL DAYS VOLUME					
	Total	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	161,938,794	132,240,785	153,803,743	157,872,580	159,615,030	160,455,873
TWO-DAY	644,775,458	64,110,366	440,651,460	564,103,276	607,606,572	626,835,456
THREE-DAY	35,284,130	996,404	12,056,615	23,798,173	29,500,314	32,287,646



Attachment OCA/USPS-103-  
Priority FY 2001

	PERCENT DELIVERED IN	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		99	100	100	100	100
TWO-DAY		98	99	99	100	100
THREE-DAY		95	97	98	99	99
	KNOWN DEL DAYS VOLUME					
	Total	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	161,938,794	160,979,942	161,293,786	161,487,235	161,615,348	161,679,681
TWO-DAY	644,775,458	634,509,985	638,280,288	641,222,701	642,483,594	643,281,577
THREE-DAY	35,284,130	33,508,674	34,113,294	34,581,605	34,857,071	34,990,777

Attachment OCA/USPS-103-  
Priority FY 2001

	PERCENT DELIVERED IN					
	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS	
OVERNIGHT	100	100	100	100	100	100
TWO-DAY	100	100	100	100	100	100
THREE-DAY	99	100	100	100	100	100
KNOWN DEL DAYS VOLUME						
	Total	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	161,938,794	161,728,731	161,775,532	161,804,362	161,823,187	161,844,338
TWO-DAY	644,775,458	643,721,814	643,954,180	644,141,797	644,317,839	644,410,653
THREE-DAY	35,284,130	35,074,859	35,120,697	35,155,861	35,185,689	35,214,421

Attachment OCA/USPS-103-  
Priority FY 2000

	PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT		84	96	98	99	99
TWO-DAY		11	72	90	96	98
THREE-DAY		4	38	70	86	93
	KNOWN DEL DAYS VOLUME					
	Total	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	177,719,282	148,843,523	169,821,924	173,535,470	175,551,184	176,440,364
TWO-DAY	675,887,126	72,795,362	488,810,578	608,245,891	647,115,877	662,442,681
THREE-DAY	35,277,339	1,309,279	13,413,561	24,715,953	30,279,358	32,663,372

Attachment A  
p. 43232

Attachment OCA/USPS-103-  
Priority FY 2000

	PERCENT DELIVERED IN	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		99	99	100	100	100
THREE-DAY		96	97	98	99	99
	KNOWN DEL DAYS VOLUME					
	Total	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	177,719,282	176,880,784	177,182,112	177,325,743	177,404,693	177,450,026
TWO-DAY	675,887,126	668,732,498	671,651,167	673,365,634	674,092,960	674,648,779
THREE-DAY	35,277,339	33,801,993	34,334,357	34,730,539	34,874,249	35,000,903

Attachment OCA/USPS-103-  
Priority FY 2000

	PERCENT DELIVERED IN	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		100	100	100	100	100
THREE-DAY		99	100	100	100	100
	KNOWN DEL DAYS VOLUME					
	Total	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	177,719,282	177,499,249	177,522,910	177,545,742	177,580,591	177,609,395
TWO-DAY	675,887,126	675,045,245	675,219,588	675,367,122	675,479,629	675,572,934
THREE-DAY	35,277,339	35,068,768	35,102,171	35,169,498	35,191,057	35,205,187

Attachment A p3264

Attachment OCA/USPS-103-  
Priority FY 1999

	PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT		85	96	98	99	99
TWO-DAY		11	74	91	96	98
THREE-DAY		4	44	76	89	95
	KNOWN DEL DAYS VOLUME					
	Total	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	182,715,829	155,723,983	175,898,238	178,957,473	180,786,752	181,437,869
TWO-DAY	649,548,826	73,419,320	479,912,378	590,476,505	625,242,814	638,342,688
THREE-DAY	32,102,760	1,238,669	14,225,090	24,402,913	28,564,967	30,382,576

Attachment OCA/USPS-103-  
Priority FY 1999

	PERCENT DELIVERED IN	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		99	99	100	100	100
THREE-DAY		97	98	99	99	99
	KNOWN DEL DAYS VOLUME					
	Total	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	182,715,829	181,842,547	182,070,519	182,244,964	182,364,918	182,463,337
TWO-DAY	649,548,826	643,621,942	645,803,836	647,430,736	648,172,895	648,535,196
THREE-DAY	32,102,760	31,217,480	31,517,652	31,719,023	31,864,291	31,912,540

Attachment A p. 8

Attachment OCA/USPS-103-  
Priority FY 1999

	PERCENT DELIVERED IN	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		100	100	100	100	100
THREE-DAY		100	100	100	100	100
	KNOWN DEL DAYS VOLUME					
	Total	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	182,715,829	182,507,648	182,533,198	182,546,307	182,557,707	182,577,043
TWO-DAY	649,548,826	648,857,389	649,041,372	649,154,006	649,244,556	649,295,512
THREE-DAY	32,102,760	31,948,631	31,984,903	32,006,973	32,022,722	32,036,028

Attachment A p. 9237



Attachment OCA/USPS-103-  
First-Class Single Piece Letters - 2001

	PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT		92	98	99	99	100
TWO-DAY		24	86	96	98	99
THREE-DAY		6	39	82	93	97
	KNOWN DEL DAYS VOLUME					
	Total	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	21,571,314,688	19,923,925,353	21,137,059,562	21,321,602,721	21,428,838,880	21,479,795,399
TWO-DAY	10,044,115,195	2,432,832,323	8,666,992,222	9,613,806,478	9,849,606,651	9,945,239,507
THREE-DAY	9,490,598,821	616,457,143	3,728,398,208	7,761,619,857	8,818,011,716	9,179,756,290

Attachment OCA/USPS-103-  
First-Class Single Piece Letters - 2001

	PERCENT DELIVERED IN	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		100	100		100	100
TWO-DAY		99	100		100	100
THREE-DAY		98	99		100	100
	KNOWN DEL DAYS VOLUME					
	Total	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	21,571,314,688	21,507,218,503	21,523,777,284	21,536,654,991	21,544,233,525	21,550,201,816
TWO-DAY	10,044,115,195	9,985,222,922	10,004,519,213	10,017,982,860	10,025,273,142	10,029,959,509
THREE-DAY	9,490,598,821	9,316,904,226	9,381,716,911	9,434,586,917	9,451,898,603	9,463,071,436

Attachment OCA/USPS-103-  
First-Class Single Piece Letters - 2001

	PERCENT DELIVERED IN	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		100	100	100	100	100
THREE-DAY		100	100	100	100	100
	KNOWN DEL DAYS VOLUME					
	Total	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	21,571,314,688	21,555,879,833	21,558,899,298	21,561,498,107	21,563,233,051	21,564,427,749
TWO-DAY	10,044,115,195	10,033,021,603	10,036,155,306	10,037,644,766	10,039,261,798	10,040,431,450
THREE-DAY	9,490,598,821	9,470,870,459	9,476,281,104	9,480,238,752	9,482,877,154	9,484,492,112

Attachment B  
p. 3

Attachment OCA/USPS-103-  
First-Class Single Piece Letters-2000

	PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT		93	98	99	99	100
TWO-DAY		25	88	96	98	99
THREE-DAY		7	42	85	95	98
	KNOWN DEL DAYS VOLUME					
	Total	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	21,812,477,373	20,378,237,525	21,445,106,676	21,613,998,619	21,700,100,111	21,742,168,012
TWO-DAY	10,667,731,641	2,690,771,686	9,370,667,024	10,269,459,799	10,489,849,360	10,581,958,193
THREE-DAY	9,603,580,239	663,036,835	4,039,309,260	8,178,490,561	9,099,098,532	9,382,374,699

Attachment B p. 4

Attachment OCA/USPS-103-  
First-Class Single Piece Letters-2000

	PERCENT DELIVERED IN	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		100	100		100	100
TWO-DAY		100	100		100	100
THREE-DAY		99	99		100	100
	KNOWN DEL DAYS VOLUME					
	Total	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	21,812,477,373	21,764,164,407	21,776,893,399	21,787,563,912	21,793,901,545	21,797,951,282
TWO-DAY	10,667,731,641	10,620,579,592	10,636,808,954	10,647,240,696	10,653,608,171	10,657,675,829
THREE-DAY	9,603,580,239	9,490,405,721	9,536,205,199	9,563,570,494	9,577,015,681	9,585,323,055

Attachment OCA/USPS-103-  
First-Class Single Piece Letters-2000

	PERCENT DELIVERED IN	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		100	100	100	100	100
THREE-DAY		100	100	100	100	100
	KNOWN DEL DAYS VOLUME					
	Total	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	21,812,477,373	21,801,278,869	21,803,468,784	21,805,012,668	21,806,644,238	21,807,659,874
TWO-DAY	10,667,731,641	10,660,131,619	10,662,041,946	10,663,375,368	10,664,347,694	10,664,929,683
THREE-DAY	9,603,580,239	9,590,275,654	9,593,467,249	9,596,051,833	9,597,939,892	9,599,083,576

Attachment B  
p. 6243

**Attachment OCA/USPS-103-  
First-Class Single Piece Letters - 1999**

	PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT		94	98	99	100	100
TWO-DAY		26	89	97	99	99
THREE-DAY		8	44	87	95	98
	KNOWN DEL DAYS VOLUME					
	Total	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	21,530,027,387	20,250,353,889	21,199,061,628	21,351,276,356	21,434,639,549	21,469,314,832
TWO-DAY	10,697,135,213	2,760,843,882	9,522,563,325	10,370,970,481	10,556,152,343	10,626,466,765
THREE-DAY	9,336,779,133	727,376,084	4,081,957,803	8,111,705,168	8,909,134,062	9,141,667,234

Attachment B p. 73244

**Attachment OCA/USPS-103-  
First-Class Single Piece Letters - 1999**

	<i>PERCENT DELIVERED IN</i>	<i>6 DAYS</i>	<i>7 DAYS</i>	<i>8 DAYS</i>	<i>9 DAYS</i>	<i>10 DAYS</i>
<b>OVERNIGHT</b>		100	100		100	100
<b>TWO-DAY</b>		100	100		100	100
<b>THREE-DAY</b>		99	99		100	100
	<i>KNOWN DEL DAYS VOLUME</i>					
	<i>Total</i>	<i>6 DAYS</i>	<i>7 DAYS</i>	<i>8 DAYS</i>	<i>9 DAYS</i>	<i>10 DAYS</i>
<b>OVERNIGHT</b>	21,530,027,387	21,487,511,340	21,498,090,880	21,506,037,927	21,511,553,519	21,515,932,534
<b>TWO-DAY</b>	10,697,135,213	10,657,136,589	10,669,581,638	10,680,363,517	10,685,949,926	10,688,804,674
<b>THREE-DAY</b>	9,336,779,133	9,241,297,125	9,278,175,665	9,302,843,003	9,314,713,001	9,321,119,371



Attachment OCA/USPS-103-  
First-Class Single Piece Letters - 1999

	PERCENT DELIVERED IN	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		100	100	100	100	100
TWO-DAY		100	100	100	100	100
THREE-DAY		100	100	100	100	100
	KNOWN DEL DAYS VOLUME					
	Total	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	21,530,027,387	21,519,420,921	21,521,667,680	21,523,490,881	21,524,671,741	21,525,410,392
TWO-DAY	10,697,135,213	10,691,234,385	10,692,867,219	10,693,797,643	10,694,478,615	10,695,103,534
THREE-DAY	9,336,779,133	9,325,744,051	9,329,145,920	9,330,827,914	9,332,534,602	9,333,367,230

# INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE (OCA/USPS-103)

## External First-Class Mail (EXFC) Measurement System

### National Overnight Service Standard Results

Fiscal Year	1 Day	2 Day	Percent Delivered within		
			3 Day	4 Day	5 Day
1999	93	98	99	100	100
2000	94	98	99	100	100
2001	94	98	99	99	100

### National Two-Day Service Standard Results

Fiscal Year	1 Day	2 Day	Percent Delivered within		
			3 Day	4 Day	5 Day
1999	20	87	96	98	99
2000	20	86	96	98	99
2001	18	85	95	98	99

### National Three-Day Service Standard Results

Fiscal Year	1 Day	2 Day	Percent Delivered within		
			3 Day	4 Day	5 Day
1999	5	33	86	95	98
2000	4	31	84	94	98
2001	4	28	81	92	97

## Priority Mail End-to-End (PETE) Measurement System

### National Overnight Service Standard Results

Fiscal Year	1 Day	2 Day	Percent Delivered within		
			3 Day	4 Day	5 Day
1999	90	97	99	100	100
2000	90	97	99	100	100
2001	89	97	99	100	100

### National Two-Day Service Standard Results

Fiscal Year	1 Day	2 Day	Percent Delivered within		
			3 Day	4 Day	5 Day
1999	17	79	94	98	99
2000	17	80	93	98	99
2001	15	75	91	96	98

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-105.** For each of the past three years and for each of the data systems that collect data on (a) Express Mail, (b) Priority Mail, and (c) First-Class Mail, please provide a definition of (1) the point of entry into the data collection system (for example, deposit of an envelope into a mailbox) and (2) the point of exit from the data collection system (for example, arrival of a piece of mail at the destination Postal Service facility or physical delivery to the addressee's residence). Please provide cites to source documents and provide copies if one has not been previously filed in this docket.

- (a) If the point of entry and/or the point of exit used in the data system(s) differs from that used to calculate Postal Service's service standards, please provide the alternative definitions used to calculate the service standards and identify how each alternative definition differs from the definition used in the applicable data system(s). Please provide cites to source documents and provide copies if one has not been previously filed in this docket.
- (b) Referring to part "a" of this interrogatory, for each alternative definition, identify all documents that discuss the reason(s) for the adoption of different standards. Please provide cites to these documents and provide copies if one has not been previously filed in this docket.

**RESPONSE:**

The following systems collect information that bears some relationship to service standards: PETE, EXFC, ODIS, and EMRS.

PETE and EXFC both collect data using points of entry/exit that are co-extensive with service standards. Information from mail is collected when it enters the system (e.g., a collection box) and information is again collected from mail when it reaches a reporter's address. As such, these systems collect information that bears directly on service standard compliance. See Docket No. R2000-1, USPS-LR-I-326 at 9.

The other two systems' alternative approaches are explained below.

ODIS, the Origin-Destination Information System, is documented in USPS-LR-J-45, 137 and 141.

ODIS collects these data for all classes of mail except Express Mail, second-class, Mailgram, and INTELPOST. Information is also recorded for

R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

five physical shapes of mail. Volumes and service times are measured within and between sectional center facilities (SCFs), multi-ZIP Coded cities, independent cities, and area distribution centers (ADCS). These are collectively known as ODIS areas.

USPS-LR-J-141, at 5. In ODIS, a piece of mail "enters" the data collection system when it is sampled at a Mail Exit Point (MEP). The sampled mailpiece exits the data collection system after all pertinent information is recorded and it is returned to the mail processing system for further handling or delivery. ODIS measures days to delivery from the postmark date (cancellation mark or meter imprint) to the day the piece is sampled. ODIS cannot measure the time a piece is in the system before it is cancelled nor can it measure the time between an ODIS test and delivery to a customer or delivery receptacle. ODIS does not include Express Mail.

Express Mail service performance is captured by the Electronic Marketing Reporting System (EMRS), which records, tracks, and reports on Express Mail transactions. The system is used to receive and compare the Express Mail identification numbers scanned by postal employees at the post office or mail processing plants and delivery stations. If the comparisons show no match between the scanned barcode entered at the points of acceptance and delivery, exception reports can be prepared and made available to managers each workday for follow-up action.

Express Mail customers can drop their packages in a Postal Service collection box designated for Express Mail if appropriate postage is affixed, or leave the Express

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

Mail at their designated point of collection (residential or business) for pick-up by the carrier, if appropriate postage is affixed.

Postmasters, Retail Sales/Service Associate (SSA), clerks, or other employees accepting Express Mail, electronically scan the preprinted barcode on the Express Mail label, which enters the label's unique identifying number into an automated system for tracking purposes. The employees are to weigh the package, note the calculated postage on the mailing label (Label 11-B) and complete the Origin section of the label.

*After acceptance is recorded, the Postal Service tracks each Express Mail package until it reaches the delivery station near the home or business receiving the package. At these stations, employees again electronically scan the barcode on the Express Mail label before the package is delivered.*

The current Express Mail Acceptance Process (EMCA) is diagrammed in the attachment to this response. See also, Domestic Mail Manual D500 (Deposit, Collection, and Delivery), E500 (Eligibility), and P500 (Postage and Payment Methods); and POM Chapter 3 (Collection Service, National Service Standards).

```

graph TD
    subgraph Customer
        C1([Desires Express Mail Service]) --> C2[Complete Applicable Label Requirements]
        C2 --> C3[Enter EMCA Number]
        C3 --> C4[Deposit Piece in Personal Mail Receptacle, Collection Box, Deliver to USPS, or Request Pickup]
    end

    subgraph USPS_Retail_or_Processing_Employee [USPS Retail or Processing Employee]
        D1{POS / IRT Site?} -- Yes --> U1[Weigh Piece]
        U1 --> S1[System Checks Express Mail Directory]
        S1 --> B1[Scan Barcode]
        B1 --> L1[Complete Label]
        L1 --> E1[Enter EMCA Number Into POS / IRT (transaction recorded)]
        E1 --> M1[Enter Piece into Mailstream]
        M1 --> C5([Transaction Complete])
        
        D1 -- No --> U2[Check for Valid Acct. in Postal Bulletin]
        U2 --> U3[Check Express Mail Directory for Service]
        U3 --> U4[Weigh Piece / Complete Label]
        U4 --> U5[Enter Piece into Mailstream]
        U5 --> U6[Forward Finance Label Copy to ESS]
    end

    subgraph Expedited_Service_Specialist_ESS [Expedited Service Specialist (ESS)]
        E1 --> E2[Enter Label Info. Into EMRS]
        E2 --> E3([Acct. debited])
        E3 --> E4([RCU forwards info. to EMRS])
        E4 --> E5([EMRS debits account])
        E5 --> M1
    end

    C4 --> D1
    U6 --> E2

```

The flowchart illustrates the process for creating and applying an Express Mail label, involving three main roles: Customer, USPS Retail or Processing Employee, and Expedited Service Specialist (ESS).

**Customer Process:**

- Desires Express Mail Service
- Complete Applicable Label Requirements
- Enter EMCA Number
- Deposit Piece in Personal Mail Receptacle, Collection Box, Deliver to USPS, or Request Pickup

**USPS Retail or Processing Employee Process:**

- Decision: POS / IRT Site?
  - Yes:** Weigh Piece → System Checks Express Mail Directory → Scan Barcode → Complete Label → Enter EMCA Number Into POS / IRT (transaction recorded) → Enter Piece into Mailstream → Transaction Complete.
  - No:** Check for Valid Acct. in Postal Bulletin → Check Express Mail Directory for Service → Weigh Piece / Complete Label → Enter Piece into Mailstream → Forward Finance Label Copy to ESS.

**Expedited Service Specialist (ESS) Process:**

- Enter Label Info. Into EMRS
- Acct. debited
- RCU forwards info. to EMRS
- EMRS debits account

The process concludes with the piece being entered into the mailstream and the transaction being complete.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

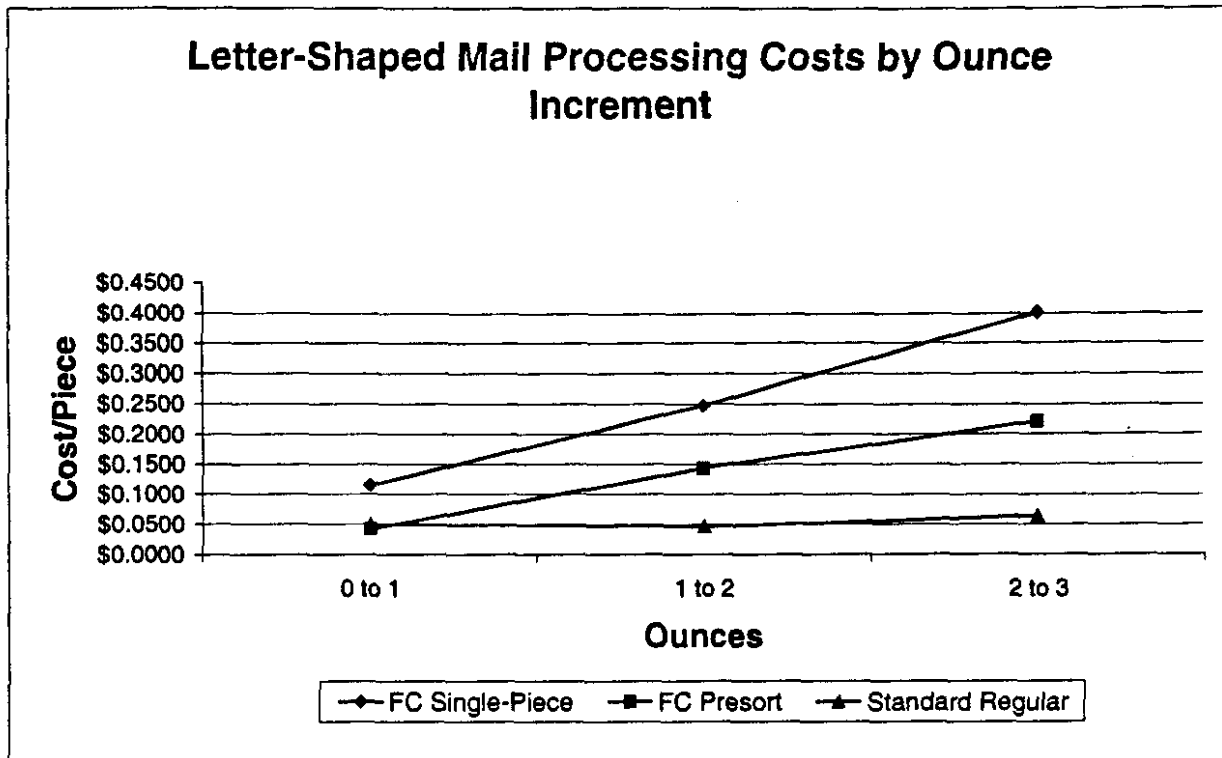
3252

OCA/USPS-106. Please refer to the table and the graph below.

LETTER-SHAPED MAIL PROCESSING COSTS  
BY OUNCE INCREMENT, 0 to 3 ozs.  
Single-Piece, Presorted, Standard Regular  
Test Year

Single-Piece	0 to 1	1 to 2	2 to 3
volume	40,831,219,813	1,777,163,946	294,578,927
all mp (3.1) tally (\$000)	4,698,665	438,490	118,329
MP Unit Cost	\$0.1151	\$0.2467	\$0.4017
Marginal Cost Difference		\$0.1317	\$0.1550
Percentage Change		114.41%	62.80%
Presort			
volume	49,102,814,768	1,203,209,191	126,940,877
all mp (3.1) tally (\$000)	2,085,986	172,253	28,018
MP Unit Cost	\$0.0425	\$0.1432	\$0.2207
Marginal Cost Difference		\$0.1007	\$0.0776
Percentage Change		236.99%	54.17%
Standard Regular			
volume	33,010,451,919	7,106,016,427	1,504,667,741
all mp (3.1) tally (\$000)	1,642,169	329,152	95,961
MP Unit Cost	\$0.0497	\$0.0463	\$0.0638
Marginal Cost Difference		(\$0.0034)	\$0.0175
Percentage Change		-6.89%	37.68%

SOURCE: First-Class Single-Piece, USPS-LR-J-58, LR58ASP.xls, at 16.  
First-Class Presort, USPS-LR-J-58, LR58PRE.xls, at 16.  
Standard Mail, USPS-LR-J-58, LR58AREG.xls, at 17.



- a. Please confirm that the "MP Unit Cost" for Single-Piece, Presort, and Standard Regular at each weight increment is correct. If you do not confirm, please provide the correct mail processing unit costs and show all calculations.
- b. Please confirm that the "Marginal Cost Difference" for Single-Piece, Presort, and Standard Regular is correct. If you do not confirm, please provide the correct marginal cost difference and show all calculations.
- c. Please confirm that the "Percentage Change" for Single-Piece, Presort, and Standard Regular is correct. If you do not confirm, please provide the correct percentage change and show all calculations.



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

**RESPONSE:**

- a. The calculations are confirmed.
- b. The calculations are confirmed.
- c. The calculations are confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-107.** Please refer to the table in OCA/USPS-106. For single-piece, presort, and Standard Regular, please provide the number of weighted and unweighted tallies for the line, "all mp (3.1) tally (\$000)."

**RESPONSE:**

**LETTER-SHAPED WEIGHTED IOCS TALLIES (000)  
FOR MAIL PROCESSING (C/S 3.1)  
BY OUNCE INCREMENT, 0 to 3 oz.**

<u>Subclass</u>	<u>0 to 1</u>	<u>1 to 2</u>	<u>2 to 3</u>
First-Class Single Piece	1,677,070	159,927	44,889
First-Class Presort	607,916	48,325	8,116
Standard Regular	470,777	93,588	27,686

**LETTER-SHAPED UNWEIGHTED IOCS TALLIES  
FOR MAIL PROCESSING (C/S 3.1)  
BY OUNCE INCREMENT, 0 to 3 oz.**

<u>Subclass</u>	<u>0 to 1</u>	<u>1 to 2</u>	<u>2 to 3</u>
First-Class Single Piece	22,894	2,286	44,889
First-Class Presort	7,966	679	110
Standard Regular	6,497	1,319	407

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

3256

**OCA/USPS-108.** Please refer to the table and graph in OCA/USPS-106. Please provide the standard error for the mail processing unit costs at each ounce increment for single-piece, presort, and Standard Regular.

**RESPONSE:**

Given *limited resources* and the fact that the cost estimates were only used to indicate the general relationship between cost and weight, no standard errors were calculated for Test Year mail processing cost estimates reported in USPS-LR-J-58.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-109.** Please refer to the table and graph in OCA/USPS-106. For single-piece, presort, and Standard Regular, please provide the direct volume variable mail processing costs without any piggyback factors or indirect costs.

**RESPONSE:**

LETTER-SHAPED DIRECT VOLUME-VARIABLE COSTS (\$000)  
FOR MAIL PROCESSING (C/S 3.1)  
BY OUNCE INCREMENT, 0 to 3 oz.

Subclass	0 to 1	1 to 2	2 to 3
First-Class Single Piece	1,512,879	138,884	37,773
First-Class Presort	567,963	45,675	6,912
Standard Regular	429,831	83,646	25,221

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-110.** Please refer to USPS-LR-J-58, at pages 1 and 2, which contain the Premium Pay Factors and Reconciliation Factors by Class, and the test year Piggyback Factors and Cost Ratio by Cost Pool. Also, please refer to pages 103 to 202 in USPS-LR-J-58.

- a. For MODS 1 and 2 and Non-MODS offices, please confirm that test year volume variable mail processing costs are determined as follows: base year 2000 mail processing costs \* class-specific reconciliation factor \* pool-specific cost ratio \* ((class-specific premium pay factor + pool-specific piggyback factor) - 1). If you do not confirm, please explain.
- b. Please confirm that the formula in part a. is applicable to all classes by shape and ounce increments. If you do not confirm, please explain.
- c. For BMCs, please confirm that test year volume variable mail processing costs are determined as follows: base year 2000 mail processing costs \* class-specific reconciliation factor \* pool-specific cost ratio \* pool-specific piggyback factor. If you do not confirm, please explain.
- d. Please confirm that the formula in part c. is applicable to all classes by shape and ounce increment. If you do not confirm, please explain.

**RESPONSE:**

- a. Not confirmed. The test year volume variable mail processing costs are determined as follows: base year 2000 mail processing costs \* class-specific reconciliation factor \* pool-specific cost ratio \* (class-specific premium pay factor + pool-specific piggyback factor - 1).
- b. Confirmed, using the corrected formula in the response to a.
- c. Confirmed.
- d. Confirmed.

Response of the United States Postal Service to Interrogatories of the Office of  
the Consumer Advocate

3259

**OCA/USPS-111.**

- a. Please identify the LDC, cost pools, and MODS 3-digit codes applicable to the processing of letters, flats and parcels (i.e., nonletters/nonflats), respectively. If this information has been previously provided in this docket, please give the citation.
- b. For the LDC, cost pools, and MODS 3-digit codes provided in response to part a., please provide the workhours, total pieces handled (TPH), total pieces fed (TPF), first handling pieces (FHP), and pool costs. If this information has been previously provided in this docket, please give the citation.
- c. For the LDC, cost pools, and MODS 3-digit codes provided in response to part a., please identify those LDC, cost pools, and MODS 3-digit codes that involve the application of barcodes. If this information has been previously provided in this docket, please give the citation.

**OCA/USPS-111 Response:**

- a. Please see USPS LR-J-55, Section I, at I-12 to I-27. The following MODS mail processing cost pools are shape-specific:  
  
Letters: OCR, BCS/, BCS/DBCS, LSM, MANL (Manual Letters), LD41  
  
Flats: FSM/, FSM/1000, MANF (Manual Flats)  
  
Parcels: MECPARC, MANP (Manual Parcels)
- b. Please see the USPS LR-J-55, Section I, at I-5 for the pool costs. Please see the responses to interrogatories AOL-TW/USPS-1 and AOL-TW/USPS-3 for the workhour and piece handling data.
- c. The operations in the OCR cost pool, and OSS operations in LDCs 11 and 41, involve the application of POSTNET barcodes to letter-shaped pieces. Please see also the response to subpart (a).

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-112:**

- a. Please provide the weighted and unweighted IOCS tallies, by ounce increment, separately for letters, flats and parcels (i.e., nonletters/nonflats) in First-Class single-piece, First-Class presort, and Standard Mail Regular, respectively.
- b. Please provide the depth of sort, by ounce increment, separately for letters, flats and parcels (i.e., nonletters/nonflats) in First-Class single-piece, First-Class presort, and Standard Mail Regular, respectively.

**RESPONSE**

- a. Tables 1-5 display IOCS direct tallies by ounce increment for letters, flats, IPPs and parcels in First-Class Single-Piece, First-Class Presort and Standard Mail Regular.

TABLE 1

OUNCE INCREMENT: WEIGHT <= 1 OZ.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
FIRST CLASS	SINGLE PIECE	34,006	2,524,457,467.67	1,873	134,494,769.73	154	10,621,039.10
	PRESORT	13,644	1,021,893,900.71	437	31,106,438.49	8	508,767.41
STD. MAIL	REGULAR	10,442	761,462,851.03	2,637	194,018,901.85	101	7,177,700.88

TABLE 2

OUNCE INCREMENT: 1 OZ. < WEIGHT <= 2 OZS.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
FIRST CLASS	SINGLE PIECE	3,180	228,570,448.15	3,848	277,738,522.97	294	21,606,245.16
	PRESORT	1,057	74,919,444.55	407	28,849,845.94	10	733,388.26
STD. MAIL	REGULAR	1,910	138,371,019.21	3,709	275,441,301.63	159	11,957,648.20

TABLE 3

OUNCE INCREMENT: 2 OZS. < WEIGHT <= 3 OZS.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
FIRST CLASS	SINGLE PIECE	850	58,418,000.75	2,063	149,326,912.15	261	17,601,133.38
	PRESORT	170	12,243,808.04	216	15,624,257.47	5	308,658.80
STD. MAIL	REGULAR	531	37,020,488.59	2,504	183,908,218.72	164	12,092,558.69

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

a. (Continued)

TABLE 4--

OUNCE INCREMENT: 3 OZS. < WEIGHT ≤ 4 OZS.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
FIRST CLASS	SINGLE PIECE	311	21,831,773.20	1,638	116,548,518.66	334	23,551,499.39
	PRESORT	78	5,243,226.38	163	11,924,229.65	7	500,144.88
STD. MAIL	REGULAR	293	20,042,593.51	2,659	196,945,494.47	273	20,714,105.91

TABLE 5--

OUNCE INCREMENT: WEIGHT > 4 OZS.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
FIRST CLASS	SINGLE PIECE	146	9,760,737.07	2,640	189,456,089.77	894	64,136,462.36
	PRESORT	53	3,568,980.38	172	12,421,327.43	9	574,326.27
STD. MAIL	REGULAR	144	10,692,189.50	3,082	231,163,495.43	1,120	82,822,619.58

b. Tables 6-9, 10(a.) and 10(b.) display IOCS direct tallies by ounce increment and activity code for letters, flats, IPPs, and parcels in First-Class Single-Piece, First-Class Presort, and Standard Mail Regular. In IOCS, activity code provides the most extensive information about depth of sort.



RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

TABLE 6 OUNCE INCREMENT: WEIGHT <= 1 OZ.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
Mail Class	Activity Code						
FIRST-CLASS	1060-SINGLE-PIECE	34,006	2,524,457,467.67	0	0	0	0
	1080-NONAUTOMATED PRESORT	4,303	322,314,186.24	0	0	0	0
	1085-AUTOMATED CARRIER ROUTE PRESORT	181	14,034,564.88	0	0	0	0
	1086-AUTOMATED PRESORT	9,160	685,545,149.59	0	0	0	0
	2060-SINGLE-PIECE	0	0	1,873	134,494,769.73	0	0
	2080-NONAUTOMATED PRESORT	0	0	109	6,972,672.54	0	0
	2086-AUTOMATED PRESORT	0	0	328	24,133,765.95	0	0
	3060-IPP UP TO 8 OZ.	0	0	0	0	154	10,621,039.10
	3080-IPP UP TO 8 OZ. NONAUTOMATED PRESORT	0	0	0	0	8	508,767.41
STD. MAIL	1340-REGULAR NONAUTOMATED PRESORT	3,124	230,868,206.96	0	0	0	0
	1345-REGULAR AUTOMATED PRESORT	4,603	332,786,430.60	0	0	0	0
	1350-NONPROFIT NONAUTOMATED PRESORT	1,421	104,812,327.13	0	0	0	0
	1355-NONPROFIT AUTOMATED PRESORT	1,294	92,995,886.34	0	0	0	0
	2340-REGULAR NONAUTOMATED PRESORT	0	0	730	54,007,287.06	0	0
	2345-REGULAR AUTOMATED PRESORT	0	0	1,463	106,869,344.72	0	0
	2350-NONPROFIT NONAUTOMATED PRESORT	0	0	209	15,712,532.56	0	0
	2355-NONPROFIT AUTOMATED PRESORT	0	0	235	17,429,737.51	0	0
	3340-REGULAR NONAUTOMATED PRESORT	0	0	0	0	87	6,330,932.08
	3350-NONPROFIT NONAUTOMATED PRESORT	0	0	0	0	14	846,768.80

# RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

TABLE 7--

OUNCE INCREMENT: 1 oz. < WEIGHT ≤ 2 OZs		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
Mail Class	Activity Code						
FIRST-CLASS	1060-SINGLE-PIECE	3,180	228,570,448.15	0	0	0	0
	1080-NONAUTOMATED PRESORT	325	23,913,301.45	0	0	0	0
	1085-AUTOMATED CARRIER ROUTE PRESORT	11	867,812.83	0	0	0	0
	1086-AUTOMATED PRESORT	721	50,138,330.27	0	0	0	0
	2060-SINGLE-PIECE	0	0	3,848	277,738,522.97	0	0
	2080-NONAUTOMATED PRESORT	0	0	131	9,515,600.54	0	0
	2086-AUTOMATED PRESORT	0	0	276	19,334,245.40	0	0
	3060-IPP UP TO 8 OZ.	0	0	0	0	294	21,606,245.16
	3080-IPP UP TO 8 OZ. NONAUTOMATED PRESORT	0	0	0	0	10	733,388.26
STD. MAIL	1340-REGULAR NONAUTOMATED PRESORT	572	41,927,048.48	0	0	0	0
	1345-REGULAR AUTOMATED PRESORT	916	65,792,406.26	0	0	0	0
	1350-NONPROFIT NONAUTOMATED PRESORT	185	14,053,826.10	0	0	0	0
	1355-NONPROFIT AUTOMATED PRESORT	237	16,597,738.37	0	0	0	0
	2340-REGULAR NONAUTOMATED PRESORT	0	0	936	69,512,732.28	0	0
	2345-REGULAR AUTOMATED PRESORT	0	0	2,230	165,113,958.95	0	0
	2350-NONPROFIT NONAUTOMATED PRESORT	0	0	225	17,411,969.05	0	0
	2355-NONPROFIT AUTOMATED PRESORT	0	0	318	23,402,641.35	0	0
	3340-REGULAR NONAUTOMATED PRESORT	0	0	0	0	143	10,925,547.23
	3350-NONPROFIT NONAUTOMATED PRESORT	0	0	0	0	16	1,032,101.07

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

TABLE 8

OUNCE INCREMENT: 2 OZS. < WEIGHT ≤ 3 OZS.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
Mail Class	Activity Code						
FIRST-CLASS	1060-SINGLE-PIECE	850	58,418,000.75	0	0	0	0
	1080-NONAUTOMATED PRESORT	67	4,920,248.98	0	0	0	0
	1086-AUTOMATED PRESORT	103	7,323,559.06	0	0	0	0
	2060-SINGLE-PIECE	0	0	2,063	149,326,912.15	0	0
	2080-NONAUTOMATED PRESORT	0	0	55	4,288,650.47	0	0
	2086-AUTOMATED PRESORT	0	0	161	11,335,607.00	0	0
	3060-IPP UP TO 8 OZ.	0	0	0	0	261	17,601,133.38
	3080-IPP UP TO 8 OZ. NONAUTOMATED PRESORT	0	0	0	0	5	308,658.80
STD. MAIL	1340-REGULAR NONAUTOMATED PRESORT	153	11,214,547.71	0	0	0	0
	1345-REGULAR AUTOMATED PRESORT	276	19,613,489.41	0	0	0	0
	1350-NONPROFIT NONAUTOMATED PRESORT	43	2,798,103.02	0	0	0	0
	1355-NONPROFIT AUTOMATED PRESORT	57	3,394,348.45	0	0	0	0
	2340-REGULAR NONAUTOMATED PRESORT	0	0	595	43,732,757.97	0	0
	2345-REGULAR AUTOMATED PRESORT	0	0	1,629	120,628,701.15	0	0
	2350-NONPROFIT NONAUTOMATED PRESORT	0	0	103	6,897,145.04	0	0
	2355-NONPROFIT AUTOMATED PRESORT	0	0	177	12,649,614.56	0	0
	3340-REGULAR NONAUTOMATED PRESORT	0	0	0	0	147	11,016,736.70
	3350-NONPROFIT NONAUTOMATED PRESORT	0	0	0	0	17	1,075,821.99

# RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

TABLE 9--

OUNCE INCREMENT: 3 OZS. < WEIGHT ≤ 4 OZS.		LETTER		FLAT		IPP OF PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
Mail Class	Activity Code						
FIRST-CLASS	1060-SINGLE-PIECE	311	21,831,773.20	0	0	0	0
	1080-NONAUTOMATED PRESORT	31	2,229,450.78	0	0	0	0
	1086-AUTOMATED PRESORT	47	3,013,775.60	0	0	0	0
	2060-SINGLE-PIECE	0	0	1,638	116,548,518.66	0	0
	2080-NONAUTOMATED PRESORT	0	0	46	3,255,342.60	0	0
	2086-AUTOMATED PRESORT	0	0	117	8,668,887.05	0	0
	3060-IPP UP TO 8 OZ.	0	0	0	0	334	23,551,499.39
	3080-IPP UP TO 8 OZ. NONAUTOMATED PRESORT	0	0	0	0	7	500,144.88
STD. MAIL	1340-REGULAR NONAUTOMATED PRESORT	96	6,911,407.08	0	0	0	0
	1345-REGULAR AUTOMATED PRESORT	144	9,466,654.43	0	0	0	0
	1350-NONPROFIT NONAUTOMATED PRESORT	24	1,588,171.75	0	0	0	0
	1355-NONPROFIT AUTOMATED PRESORT	29	2,076,360.25	0	0	0	0
	2340-REGULAR NONAUTOMATED PRESORT	0	0	577	41,330,825.13	0	0
	2345-REGULAR AUTOMATED PRESORT	0	0	1,801	135,867,595.32	0	0
	2350-NONPROFIT NONAUTOMATED PRESORT	0	0	104	6,937,763.91	0	0
	2355-NONPROFIT AUTOMATED PRESORT	0	0	177	12,809,310.11	0	0
	3340-REGULAR NONAUTOMATED PRESORT	0	0	0	0	256	19,449,727.23
	3350-NONPROFIT NONAUTOMATED PRESORT	0	0	0	0	17	1,264,378.68

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

TABLE 10(a.)

OUNCE INCREMENT: WEIGHT >4 OZS.		LETTER		FLAT		IPP or PARCEL	
Mail Class	Activity Code	Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
FIRST-CLASS	1060-SINGLE-PIECE	146	9,760,737.07	0	0	0	0
	1080-NONAUTOMATED PRESORT	26	1,763,619.96	0	0	0	0
	1086-AUTOMATED PRESORT	25	1,805,360.42	0	0	0	0
	2060-SINGLE-PIECE	0	0	2,640	189,456,089.77	0	0
	2080-NONAUTOMATED PRESORT	0	0	65	4,778,334.35	0	0
	2086-AUTOMATED PRESORT	0	0	107	7,642,993.08	0	0
	3060-IPP UP TO 8 OZ.	0	0	0	0	390	28,465,699.63
	3080-IPP UP TO 8 OZ. NONAUTOMATED PRESORT	0	0	0	0	3	167,688.19
	4060-PARCEL UP TO 8 OZ.	0	0	0	0	504	35,670,762.73
	4080-PARCEL UP TO 8 OZ. NONAUTOMATED PRESORT	0	0	0	0	6	406,638.08

# RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

TABLE 10(b.)

OUNCE INCREMENT: WEIGHT >4 OZS.		LETTER		FLAT		IPP or PARCEL	
		Tallies	Weighted Tallies	Tallies	Weighted Tallies	Tallies	Weighted Tallies
Mail Class	Activity Code						
STD. MAIL	1340-REGULAR NONAUTOMATED PRESORT	65	4,891,501.80	0	0	0	0
	1345-REGULAR AUTOMATED PRESORT	51	3,862,134.06	0	0	0	0
	1350-NONPROFIT NONAUTOMATED PRESORT	11	756,903.89	0	0	0	0
	1355-NONPROFIT AUTOMATED PRESORT	17	1,181,649.75	0	0	0	0
	2340-REGULAR NONAUTOMATED PRESORT	0	0	676	50,431,560.83	0	0
	2345-REGULAR AUTOMATED PRESORT	0	0	2,149	161,872,977.99	0	0
	2350-NONPROFIT NONAUTOMATED PRESORT	0	0	84	5,904,210.28	0	0
	2355-NONPROFIT AUTOMATED PRESORT	0	0	173	12,954,746.33	0	0
	3340-REGULAR NONAUTOMATED PRESORT	0	0	0	0	291	21,478,816.48
	3350-NONPROFIT NONAUTOMATED PRESORT	0	0	0	0	26	1,789,312.88
	4340-REGULAR NONAUTOMATED PRESORT	0	0	0	0	767	57,048,558.01
	4350-NONPROFIT NONAUTOMATED PRESORT	0	0	0	0	36	2,505,932.21

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-113** Please refer to the Postal Service's response to Interrogatory AOL-TW/USPS-6(f). That response states, in part (emphasis added):

Processing schedules by machine type are developed by In-Plant Support in advance of receiving an AFSM 100 to determine exactly when each piece of equipment will be run and what type of mail will be run on each for an **average** day. This plan includes a priority ranking of mail types by machine type so that if a given machine type is not available, supervisors will have a backup plan to implement.

- a. Please define "average day."
- b. Please provide an example of a "plan [that] includes a priority ranking of mail types by machine type."
- c. Please provide an example of a "[p]rocessing schedule."
- d. Please provide an example of the calculations used to determine the characteristics of an "average day."
- e. Please provide copies of all instructions or other documents relating to the determination of what constitutes an "average day."
- f. Please provide copies of all instructions or other documents relating to the creation of a "priority ranking."
- g. Please provide copies of all instructions or other documents relating to the actions supervisors or managers should take in the event that a day is above "average."
- h. Please provide copies of all instructions or other documents relating to the actions supervisors or managers should take in the event that a day is below "average."
- i. Please respond to the above parts of this interrogatory for each piece of equipment used to sort letters and cards.

**Response:**

- a. An "average day" is a day with the typical daily volume of the appropriate type of mail arriving at the processing operation in question.
- b. See OCA/USPS-93i and j.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

- c. An example of a processing schedule is provided by screen shots in the Machine Scheduler LE Users Guide provided as USPS-LR-J-166.
- d. A standard procedure is to start with the annual volume for the mail type and group of operations. If it is an outgoing group, the annual volume is divided by 250 days per year to get a representative processing day most applicable (typically) to Wednesday for letters and Thursday for flats. If it is an incoming operation group, the annual volume is divided by 302 delivery days per year. If average volumes by day of the week are required, they are prorated from the average daily volume using locally developed factors. The exact procedure used at individual plants may vary.
- e. We are not aware of any documents on the determination of what constitutes an average day.
- f. See OCA/USPS-93i and j.
- g. See OCA/USPS-93i and j.
- h. In R97-1, USPS witness Steele described the actions that managers and supervisors may take to adjust to volume fluctuations. (See USPS-RT-8, page 10) We are not aware of other documents on this subject.
- i. The answers to the above parts of this interrogatory would be the same for letters and cards with the caveat that for letters and cards there are only two remaining types of processing: automated and manual.



RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES

3270

**OCA/USPS-114.** The following refers to Exhibit 6 of the USPS response to OCA/USPS-34.

- (a) Please confirm that the abbreviation DEC\$ following Insurance, Registered and C.O.D. refers to declared value. If you are unable to confirm, please explain the meaning of DEC\$.
- (b) Please explain what is meant by "ALPHA-F POSTNET-FLAT OFF."
- (c) Please explain what is meant by "ALPHA-Z DESTINATION ZIP LABEL."

**RESPONSE:**

(a) "DEC\$" refers to the value entered by the retail associate: declared value on a registered item; amount of insurance on an insured item; and the insurance amount or C.O.D. amount, whichever is higher, on a C.O.D. item

(b) IRTs allow retail associates to indicate that a flat (as opposed to a letter or a parcel) is being mailed so that a POSTNET destination code will appear on the PVI label. USPS flat-sorting machines read POSTNET codes rather than the interleaved 2-of-5 barcodes read by parcel sorters. The associate selects the "ALPHA" and "F" keys to signal that the item is a flat. The "ALPHA-F POSTNET-FLAT / OFF" lines on the screen indicate that the associate has **not** identified the item as a flat. If he had, the lines would read "ALPHA-F POSTNET-FLAT / ON". This display also reminds the user which keystrokes are necessary to obtain a PVI label with a POSTNET code.

(c) IRTs allow retail associates to print a no-value PVI label with a destination barcode for items which the associate determines already have sufficient customer-affixed postage. To do this, the associate selects the "ALPHA" and "Z" keys. (To print a regular PVI label with postage value, he would simply select the "PVI" key.) The "ALPHA-Z DESTINATION ZIP LABEL" line on the screen is a reminder to the associate of the keystrokes necessary to obtain the no-value barcode label.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES

**OCA/USPS-115.** The following refers to Exhibit 4, page 3, of the USPS response to OCA/USPS-24, the column under the Dependent Services header.

(a) Please confirm that the "Unavailable Services" for the Priority Mail example indicates that Return Receipt and Restricted Delivery are not available. If you are unable to confirm, please explain what is meant by the information appearing under the "Unavailable Services" header.

(b) Please confirm that return receipt is available for Priority Mail if purchased with one of the following: Certified Mail, COD, mail insured for more than \$50.00, and Registered Mail. If you are unable to confirm, please explain.

(c) Please confirm that Restricted Delivery is available for Priority Mail if combined with either COD, mail insured for more than \$50.00, Registered Mail or Certified Mail. If you are unable to confirm, please explain.

(d) If parts "b" and "c" of this interrogatory are confirmed, please explain what is meant by the information referred to in part "a" of this interrogatory.

**RESPONSE:**

(a) Services listed under "Unavailable Services" on the IBM Mailing – Service Selection screen are those which, though potentially available for the destination and mail class chosen, are not selectable at that point in the transaction. There are two reasons why a service might not be selectable:

- 1) It is a dependent service not available unless another service is selected, and the prerequisite has not been satisfied.
- 2) It conflicts with a service already chosen.

Page 3 of Exhibit 4 shows the Mailing - Service Selection screen before any selections have been made. Since return receipt and restricted delivery are available only if the article is sent registered, certified, C.O.D., or insured for over \$50, return receipt and restricted delivery cannot be selected at this point (Case #1 above). If one of the prerequisite services is selected, return receipt and

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES

restricted delivery will move from the "Unavailable Services" block to the "Dependent Services" block.

As an example of Case #2, C.O.D. service cannot be combined with certificate of mailing, certified mail, insurance, or return receipt for merchandise. Upon selection of C.O.D., those four services would move from the "Primary Services" block to the "Unavailable Services" block. Since C.O.D. is a valid prerequisite for return receipt and restricted delivery, those two services would move from the "Unavailable Services" block to the "Dependent Services" block, as described in the paragraph immediately above.

- (b) Confirmed. See USPS-T-36, Exhibit B.
- (c) Confirmed. See USPS-T-36, Exhibit B.
- (d) Please refer to the response to Part (a).

RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-116.** The purpose of this interrogatory is to better understand the interrelationships between First-Class, Priority and Express Mail and Special Service offerings. Please provide a complete copy of the "decision trees" used to implement the Primary, Dependent and Unavailable Services for (a) First-Class Mail; (b) Priority Mail and (c) Express Mail on the IBM POS ONE terminal. As an example of decision trees refer to the "decisions" made by the software used to produce the screen displays in response to OCA/USPS-24, Exhibit 4, pages 3 and 5.

**RESPONSE:**

Decision trees are not available. The mailing rules are provided to IBM in the form of a data file based on an Excel spreadsheet. The spreadsheet indicates valid/invalid services for each mail class and valid/invalid combinations of special services. Data from that spreadsheet, modified for clarity, is provided in Exhibit 1.

For example, the top section of Exhibit 1 indicates that nearly all domestic special services are available on Priority Mail. Return receipt and restricted delivery are available but from a logical standpoint are considered "dependent" services: They are available only if one of the following services is also purchased: certified, registered, COD or insurance for more than \$50.

Although all services except Express Mail merchandise insurance and PAL are available on Priority Mail, not all the valid services can be combined on a single article. For example, the bottom section of Exhibit 1 indicates that registered service cannot be combined with any form of insurance or with certified.

RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**EXHIBIT 1: SPECIAL SERVICE AVAILABILITY TABLE**

Mail Class	Registered	Insurance up to \$50	Insurance >\$50	Expr Mail Insur	Certified	COD	Return Receipt	Ret Rcpt for Merch	Restricted Deliv	Delivery Confirmation	Signature Confirmation	Special Handling	PAL	Certificate of Mailing
Express Mail Post Office-Post Office	No	No	No	Yes	No	Yes	Yes	No	No	No	No	No	No	No
Express Mail Post Office-Addressee	No	No	No	Yes	No	Yes	Yes	No	No	No	No	No	No	No
Priority Mail	Yes	Yes	Yes	No	Yes	Yes	9	Yes	9	Yes	Yes	Yes	No	Yes
First-Class Mail	Yes	Yes	Yes	No	Yes	Yes	9	No	9	No	No	Yes	No	Yes
Code "9" means the service is a dependent service, only available if the article is certified, registered, COD, or insured for \$50 or more.														

Special Service	Registered	Insurance up to \$50	Insurance >\$50	Expr Mail Insur	Certified	COD	Return Receipt	Ret Rcpt for Merch	Restricted Deliv	Delivery Confirmation	Signature Confirmation	Special Handling	PAL	Certificate of Mailing
Registered	Yes	No	No	No	No	Yes	Yes	No	Yes	Yes	Yes	No	No	No
Insurance up to \$50	No	Yes	No	No	No	No	No	Yes	No	Yes	Yes	Yes	Yes	No
Insurance over \$50	No	No	Yes	No	No	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No
Express Mail Merch Insurance	No	No	No	Yes	No	No	Yes	No	No	No	No	No	No	No
Certified	No	No	No	No	Yes	No	Yes	No	Yes	No	No	No	No	No
COD	Yes	No	No	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No
Return Receipt	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No
Return Receipt for Merchandise	No	Yes	No	No	No	No	No	Yes	No	Yes	No	Yes	Yes	No
Restricted Delivery	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No
Delivery Confirmation	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No
Signature Confirmation	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No
Special Handling	No	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Parcel Airlift (PAL)	No	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
Certificate of Mailing	No	No	No	No	No	No	No	No	No	No	No	Yes	Yes	Yes

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-117.** Please refer to your response to OCA/USPS-25(d).

- (a) For an Express Mail article sent to an overnight destination after the retail units cut off time, please confirm that the Postal Service Retail Associate is instructed to advise the patron that the package would not be delivered overnight? If you are unable to confirm, please explain.
- (b) Please estimate the likelihood of 2 mail pieces being delivered on the same day to the same Express Mail overnight destination if both pieces are entered into the mail stream after the same retail unit's cut off time. Assume that one mail piece is sent via Express Mail and the other is sent via Priority Mail.
- (c) If your response to part "b" of this interrogatory is that it is likely that the mail pieces would arrive on the same day, please indicate whether or not Retail Associates are instructed to inform postal patrons that, in this type of situation, Express Mail and Priority Mail pieces are likely to be delivered on the same day. If Retail Associates are not instructed to inform postal patrons of the likelihood of delivery occurring on the same day, please explain why not.
- d) Given that the Retail Associate advises and records that he/she has advised the customer of the Express Mail delivery guarantee, in the event that an article is addressed to a post office box that is inaccessible on weekends or to a street where delivery is not made on weekends and holidays, is the postal patron still eligible for an Express Mail postage refund if the delivery commitment isn't fulfilled?

**RESPONSE:**

- (a) The Retail Associate is instructed to refer to the Express Mail Network Directory to advise the customer of the guaranteed delivery time.
- (b) The Postal Service is unable to estimate the likelihood of 2 mail pieces being delivered on the same day to the same Express Mail overnight destination if both pieces are entered into the mail stream after the same retail unit's cut off time, assuming that one mail piece is sent via Express Mail and the other is sent via Priority Mail.
- (c) Not applicable.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE**

- (d) Express Mail Sunday and holiday delivery routes exist to provide Express Mail service on days where routine delivery service does not occur. If the delivery attempt is not made in time to meet the service guarantee, the customer can request a refund. For delivery to post office boxes, delivery is completed when the Express Mail piece is placed in the box or when the notice for pickup is placed in the post office box. If the delivery attempt is not made in time to meet the service guarantee, the customer can request a refund. See also, the response to OCA/USPS-25(d).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-118.** Please refer to your response to OCA/USPS-26 and Postal Bulletin 20047 dated (4-5-01), at page 73. The Postal Bulletin's "Retail Coaches' Corner" has the following information for "Tax Time:"

Since April 15 falls on a Sunday, the deadline for mailing tax returns is Monday, April 16. Because Tax Day follows a weekend, we should expect heavier than normal business that day. Procrastinators will be looking for suggestions from you to avoid penalties from the IRS for late filing. Offer Priority Mail with Delivery Confirmation. If they are in a hurry for their returns to get to the IRS, you may suggest Express Mail as well.

Since the "Postal Service does not see itself as a tax adviser for its customers:" please explain why the Service is suggesting Priority Mail with Delivery Confirmation as a way to avoid an IRS penalty for a late filing.

**RESPONSE:**

The editing process for this article left it somewhat misleading. The goal of the article was to suggest ways for customers to obtain peace of mind that their tax return had been delivered to the IRS. The Postal Service did not intend to advise its retail clerks that Priority Mail with Delivery Confirmation is the best way to avoid a penalty for late filing.

Certified Mail with a return receipt was mentioned as an option in the article before editing. Apparently this option was deleted because of a perception that the IRS does not want the extra work of processing return receipt cards during this particularly heavy period of receipt of mail, and because hardcopy return receipt service would not provide delivery information as quickly as *Delivery Confirmation*, and therefore not provide the peace of mind a customer desires. If the Postal Service's proposal for certified mail to include delivery status electronically is implemented, then certified mail will become a stronger option for customers concerned about whether a tax return has been delivered.



RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-119.** For FY 2000 and FY 2001 and for each day of the week (e.g., Monday – Friday), please provide the following Express Mail Next Day/Second Day Service data. Please cite your sources and provide a copy of the cited document if one has not been previously filed in this docket. If you are unable to provide an actual value, please provide an estimate.

(b) For each day of sales identified in response to (a), please provide the total volume and revenue of Express Mail for which the delivery service standard was not met.

**RESPONSE:**

See attachment.

FY2000 QTR 1 REVENUE -----17622141.80  
FY2000 QTR 1 FAIL VOL-----1221001  
  
FY2000 QTR 2 REVENUE -----31352317.30  
FY2000 QTR 2 FAIL VOL-----2074531  
  
FY2000 QTR 3 REVENUE -----19618187.45  
FY2000 QTR 3 FAIL VOL-----1368809  
  
FY2000 QTR 4 REVENUE -----24926032.85  
FY2000 QTR 4 FAIL VOL-----1745507  
  
FY2001 QTR 1 REVENUE -----20525725.55  
FY2001 QTR 1 FAIL VOL-----1424931  
  
FY2001 QTR 2 REVENUE -----45500682.55  
FY2001 QTR 2 FAIL VOL-----2942810  
  
FY2001 QTR 3 REVENUE -----22773413.75  
FY2001 QTR 3 FAIL VOL-----1527967  
  
FY2001 QTR 4 REVENUE -----28210699.05  
FY2001 QTR 4 FAIL VOL-----1908864

Response of United States Postal Service  
to  
Interrogatories of Office of the Consumer Advocate

**OCA/USPS-120.** Where does the revenue and related costs appear in the Postal Service's CRA for postal insurance that is sold in the United States for a package destined to a foreign country?

**Response:**

Revenues and related costs for insurance for international products are included in the International Mail line, page 2, columns A and C, of Exhibit USPS-11C.

Revised November 8, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-121.** Please refer to your response to OCA/USPS-28. The Postal Service responded that the average time it took to deliver an Express Mail piece to the Post Offices identified in the response to OCA/USPS-27 was 3 days for FY 2000 and FY 2001.

- (a) What is the average time it takes to deliver a Priority Mail piece to the Post Offices identified in the Postal Service's response to OCA/USPS-27?
- (b) What is the average time it takes to deliver a First-Class single piece letter to the Post Offices identified in the Postal Service's response to OCA/USPS-27?

**RESPONSE:**

- (a) Approximately 4.8 days.
- (b) Approximately 5.2 days.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-122.** The following interrogatory refers to information provided in response to OCA/USPS-30. Please confirm that the failure rates for Saturday Express Mail service for FY 2000 is 10.7 percent ( $497,939 / 4,675,362 = 10.7\%$  rounded) and for FY 2001 its 13 percent ( $576,731 / 4,419,905 = 13.0\%$  rounded). If you are unable to confirm, please provide the mathematical derivations of the corrected amounts. Include cites to source documents and provide a copy of the document if one has not been previously filed in this docket.

**RESPONSE:**

Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-123.** Please refer to your response to OCA/USPS-28. The following refers to all areas where the Postal Service Express Mail average delivery time is greater than 2 days.

(a) Please provide the total volume and revenue impacted for FY 2000 and FY 2001.

(b) Has the Postal Service considered offering a "guaranteed" reduced rate third day Express Mail service? If not, please explain why not. If so, please explain why the Postal Service has not proposed such a service. Include cites to source documents and provides a copy if one has not been previously filed in this docket.

**RESPONSE:**

(a) Objection filed.

(b) The Postal Service has not considered offering a "guaranteed" reduced rate third-day Express Mail service. Presumably, the term "third-day" does not infer expedited service, since Express Mail service standards are one- and two-day deliveries. Customers could use Priority Mail for a third-day delivery at a lower rate than Express Mail if they so desire.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-124.** Please refer to your response to OCA/USPS-33 and the response to OCA/USPS-30. The response to OCA/USPS-30 part 'b' provides volumes of Express Mail failures. Please confirm that the Postal Service is unable to provide the volume of postage refunds paid because the Postal Service failed to meet the overnight delivery standard. If you are unable to confirm, please provide the volumes that represent the amount of refunds paid in response to OCA/USPS-33(a)(3).

**RESPONSE:**

Confirmed that the Postal Service is unable to provide the volume of postage refunds paid because of its failure to meet all applicable Express Mail delivery standards.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-125.** For FY 2000 and FY 2001, please provide the total volume and total amount of postage refunds paid because the Postal Service failed to meet the 2-day Express Mail delivery standard, if the amount differs from the response to OCA/USPS-33(a)(3) and OCA/USPS-124. Please cite your sources and provide copies of the documents referenced if one has not been previously filed in this docket. Include in your response the total volume and total revenues paid in FY 2000 and FY 2001, for Express Mail delivery failures.

**RESPONSE:**

The amounts of postage refunds paid in FY 2000 and FY 2001 because the Postal Service failed to meet a 2-day standard are included in the amounts reflected in the Postal Service's response to OCA/USPS-33(a)(3).



RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3286

**OCA/USPS-126.** What is the total number of Postal Service-staffed retail facilities nationwide?

**RESPONSE:**

The *United States Postal Service Annual Report* indicates that there were 27,876 post offices and 5,802 classified stations/branches at the end of Fiscal Year 2000, a total of 33,678 Postal Service staffed facilities.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-127.** Is a Contract Office the same as a Contract Postal Unit? If not, what are the differences?

**RESPONSE:**

Yes.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-128.** What is the total number of Contract Offices nationwide?

**RESPONSE:**

The *United States Postal Service Annual Report* indicates that there were 4,382 contract postal units as of the end of Fiscal Year 2000.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-129.** Please give a complete list of the types of terminals used at Postal Service-staffed retail facilities, e.g., POS, IRT, etc.

**RESPONSE:**

Terminals used at the counters of Postal Service staffed retail facilities include IBM POS ONE terminals, NCR POS ONE terminals, Unisys IRTs, and MOS IRTs. All MOS IRTs are expected to be out of retail usage at the end of calendar year 2001.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-130.** Please give a complete list of the types of terminals used at Contract Offices, e.g., POS, IRT, etc.

**RESPONSE:**

Most contract units do not have USPS-supplied terminals. Those that do, have either Unisys IRTs or MOS IRTs. All MOS IRTs are expected to be out of retail use by the end of this calendar year.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3291

**OCA/USPS-131.** Please give a complete list of the types of terminals used at Contract Postal Units, e.g., POS, IRT, etc

**RESPONSE:**

Contract postal units are the same as contract offices. Please refer to the response to OCA/USPS-130.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-132.** Please fill in the following table for Postal Service-staffed retail facilities. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS Terminals	Percentage of facilities with IRTs	Percentage of facilities with Other Type of Terminal given in response to OCA interrog. #129	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]

**RESPONSE:**

Not all Postal Service staffed retail facilities have terminals at their counters. The chart has been modified to take that into account.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS ONE Terminals	Percentage of facilities with IRTs*	Percentage of facilities without any retail terminal*	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]
27.7%	35.5%	36.7%	N/A	N/A

- These percentages are based on an IRT facility count which is reasonably accurate but not exact.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-133.** Please fill in the following table for Contract Offices. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS Terminals	Percentage of facilities with IRTs	Percentage of facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

**RESPONSE:**

Not all contract units have terminals at their counters; in fact, most do not.

The chart has been modified to take that into account. Of those contract units with retail terminals, 100% have IRTs; none have POS ONE terminals.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS ONE Terminals	Percentage of facilities with IRTs*	Percentage of facilities without any retail terminal*	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]
0.0%	6.8%	93.2%	N/A	N/A

- These percentages are based on an estimate of the number of contract units with IRTs.



RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3294

**OCA/USPS-134.** Please fill in the following table for Contract Postal Units.  
Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS Terminals	Percentage of facilities with IRTs	Percentage of facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

**RESPONSE:**

“Contract postal units” are the same as “contract offices”. Please refer to the response to OCA/USPS-133.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3295

**OCA/USPS-135.** Please fill in the following table for Postal Service-staffed retail facilities. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of transactions at facilities with POS Terminals	Percentage of transactions at facilities with IRTs	Percentage of transactions at facilities with Other Type of Terminal given in response to OCA interrog. #129	Percentage of transactions at facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]

**RESPONSE:**

The requested information cannot be provided, because counts for most types of transactions are available only from POS ONE sites.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-136.** Please fill in the following table for Contract Offices. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of transactions at facilities with POS Terminals	Percentage of transactions at facilities with IRTs	Percentage of transactions at facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of transactions at facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

**RESPONSE:**

The requested information cannot be provided, because counts for most types of transactions are available only from POS ONE sites.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3297

**OCA/USPS-137.** Please fill in the following table for Contract Postal Units Offices. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of transactions at facilities with POS Terminals	Percentage of transactions at facilities with IRTs	Percentage of transactions at facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of transactions at facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

**RESPONSE:**

"Contract postal units" are the same as "contract offices". Please refer to the response to OCA/USPS-136.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-138.** Please fill in the following table for Postal Service-staffed retail facilities. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with POS Terminals	Percentage of revenue at facilities with IRTs	Percentage of revenue at facilities with Other Type of Terminal given in response to OCA interrog. #129	Percentage of revenue at facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]

**RESPONSE.** Not all Postal Service staffed retail facilities have terminals at their counters. The chart is modified to take this into account.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with POS Terminals	Percentage of revenue at facilities with IRTs*	Percentage of revenue at manual facilities*	Percentage of revenue at facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]
60.5%	18.9%	20.6%	N/A	N/A

\* These percentages are based on a IRT facility count which is reasonably accurate but not exact. See also response to OCA/USPS-132.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3299

**OCA/USPS-139.** Please fill in the following table for Contract Offices.

Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with POS Terminals	Percentage of revenue at facilities with IRTs	Percentage of revenue at facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of revenue at facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

**RESPONSE:**

There is no information available on contract unit revenue by type of retail terminal used.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-140.** Please fill in the following table for Contract Postal Units.  
Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with POS Terminals	Percentage of revenue at facilities with IRTs	Percentage of revenue at facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of revenue at facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

**RESPONSE:**

"Contract postal units" are the same as "contract offices". Please refer to the response to OCA/USPS-139.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

3301

**OCA/USPS-141.** Do Contract Offices use the same types of terminals as retail offices staffed by the Postal Service?

- (a) If not, please explain the methods used by the Contract Offices to inform postal customers about the various postal mailing options available, applicable postage charges, and service standards applicable to items mailed.
- (a) Please identify the types of training provided to Contract Office personnel regarding the various rates and services offered by the Postal Service and include, in your response, a complete set of the training materials, if one has not been previously filed in this docket.

**RESPONSE:**

A small number of contract units have IRTs. The exact number is not known but is believed to be only a few hundred. This is the only retail computer equipment which the Postal Service supplies to contract units. The vast majority of contract units operate like small Postal Service staffed facilities which lack terminals at the counter.

CPU contractors schedule their employees for the same training sessions that Postal retail associates at the Postal Service PEDC in their district. The training consists of 40 hours of classroom training followed by 40 hours of structured on-the-job training at a retail office which has a retail coach.

Training materials have been provided in USPS-LR-J-144.



# **RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-142** Please refer to the response to OCA/USPS-42 and the table below.

LETTER-SHAPED PIECES				
Mail Processing				
Operation	Equipment	First-Class Single-Piece	First-Class Presort	Standard Mail Regular
[1]	[2]	[3]	[4]	[5]
<b>Entry Activity</b>				
Package Sorting	Piecards			
<b>Outgoing RBCS</b>				
ISS/RCR	AFCS-ISS/RCR			
	MLOCR-ISS/RCR			
	DIOSS/RCR			
REC	VDI			
OSS	DBCS-OSS			
	DIOSS			
	MPBCS-OSS			
LMLM	LMLM			
<b>Outgoing Primary</b>				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
<b>Outgoing Secondary</b>				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
<b>Incoming RBCS</b>				
ISS/RCR	AFCS-ISS/RCR			
	MLOCR-ISS/RCR			
	DIOSS/RCR			
REC	VDI			
OSS	DBCS-OSS			
	DIOSS			
	MPBCS-OSS			
LMLM	LMLM			
<b>Incoming MMP</b>				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
<b>Incoming SCF/Prim</b>				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
<b>5-Digit Barcode Sort</b>				
	DBCS			
	MPBCS			
<b>Incoming Secondaries</b>				
Auto Carrier Route	DBCS			
	MPBCS			
Auto 3-Pass DPS	CSBCS			
Auto 2-Pass DPS	DBCS			
	MPBCS			
Man Inc Secondary Final at Plant				
	Letter Cases			
Man Inc Secondary Final at DDU				
	Letter Cases			
Box Section Sort, DPS	-----			
Box Section Sort, Other	-----			

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

3303

Column [1]: Remote Bar Coding System (RBCS); Input Sub System/Remote Computer Reader (ISS/RCR); Output Sub System (OSS); Remote Encoding Center (REC); Letter Mail Labeling Machine (LMLM); Managed Mail Program (MMP); Sectional Center Facility (SCF); Delivery Point Sequence (DPS); and, Destination Delivery Unit (DDU).  
Column [2]: Advanced Facer Canceler System-Input Sub System (AFCS-ISS); Multiline Optical Character Reader-Input Sub System (MLOCR-ISS); Remote Computer Reader (RCR); DBCS/OCR/ISS/OSS (DIOSS); Video Display Terminal (VDT); Letter Mail Labeling Machine (LMLM); Delivery Bar Code Sorter (DBCS); Mail Processing Bar Code Sorter (MPBCS); and, Carrier Sequencing Bar Code Sorter (CSBCS).

- a. Please confirm that Column [1] identifies all the mail processing operations in the processing of letter-shaped mail. If you do not confirm, please explain and identify all the mail processing operations associated with the processing of letter shaped mail.
- b. Please confirm that Column [2] identifies all the mail processing equipment used in the processing of letter-shaped mail. If you do not confirm, please explain and identify all the mail processing equipment used in the processing of letter-shaped mail.
- c. Please confirm that Column [2] identifies all the mail processing equipment used in the processing of letter-shaped mail that is associated with each mail processing operation in Column [1]. If you do not confirm, please explain and identify all the mail processing equipment in each mail processing operation associated with the processing of letter-shaped mail.
- d. In Columns [3], [4], and [5], please identify the mail processing equipment used in the processing of letter-shaped First-Class Single-Piece, First-Class Presort, and Standard Mail Regular, respectively.

**RESPONSE:**

- a. Not confirmed. The tasks in this table only represent the mail processing operations that were modeled in USPS LR-J-60. The costs represent those tasks mapped to the "worksharing related proportional" cost pools. The tasks mapped to the "worksharing related fixed" and "non-worksharing related fixed" cost pools (please see USPS LR-J-155, page I-11 to I-27) are also classified as mail processing tasks but are not listed in the table.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**RESPONSE TO OCA/USPS-142 (CONTINUED)**

- b.c. Not confirmed. The MPBCS-OSS is still relied upon for both the outgoing and incoming operations. In addition, the box section sort refers to the clerks who case the mail directly into each box. Consequently, no letter cases are used. Finally, the RCR costs are imbedded in the piggyback factor that is used for the ISS. It should be noted that the AFCS-ISS tasks are not actually included in the models found in USPS LR-J-60. The table shown above has been updated accordingly.
- d. The same processing equipment is used to process all letters and cards, regardless of class and/or presort level.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-143** Please refer to the response to OCA/USPS-42, the table in interrogatory OCA/USPS-142, and USPS-LR-J-60.

- a. From USPS-LR-J-60 at page 46, please match the items in the "Description" column with Column [2], and the items in the "MODS [Management Operating Data System] Productivity" column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.
- b. From USPS-LR-J-60 at page 48, please match the items in the "Operation Description" column with Column [2], and the items in the "Value" column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.
- c. From USPS-LR-J-60 at page 49, please match the items in the "Description" column with Column [2], and the items in the "[MODS] Operation No." column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.
- d. From USPS-LR-J-60 at page 81, please match the items in the "Description" column with Column [2], and the items in the "MODS Productivity" column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.
- e. From USPS-LR-J-60 at page 83, please match the items in the "Operation Description" column with Column [2], and the items in the "Value" column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.
- f. From USPS-LR-J-60 at page 84, please match the items in the "Description" column with Column [2], and the items in the "[MODS] Operation No." column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

**RESPONSE:**

- a. d. The productivity data relied upon in USPS LR-J-60 on pages 46 and 81 represent aggregate values when more than one piece of equipment is used for a given operation. For example, the MPBCS (MODS No. 871) and DBCS (MODS No. 891) are both used to process letters and cards in an outgoing primary operation. Consequently, the productivity value used for the automation outgoing primary operation in USPS LR-J-60 is an aggregate of MODS operation numbers 871 and 891. In addition, the productivity data represent aggregate values for all letters and cards, regardless of class and/or presort level. The actual productivity values by operation can be found on the individual "COSTS" spreadsheets in USPS LR-J-60.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

3306

**RESPONSE OF OCA/USPS-143 (CONTINUED)**

- b. e. The piggyback factors relied upon in USPS LR-J-60 on pages 48 and 83 represent aggregate values when more than one piece of equipment is used for a given operation, with one exception. The MLOCR-ISS is still the predominant ISS system for presort letters. Consequently, the MLOCR piggyback factor is used for ISS processing. The BCS automation piggyback factors use the FY 2000 MODS volumes to calculate weighted productivities based on the percentage of the mail that is processed on a DBCS versus a MPBCS. The piggyback factors represent aggregate values for all letters and cards, regardless of class and/or presort level. The actual productivity values by operation can be found on the individual "COSTS" spreadsheets in USPS LR-J-60.
- c. f. The answers to these questions are self evident given that the MODS data found in USPS LR-J-60 pages 49 and 84 list both the operation and the equipment under the "Description" heading.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-144**

Please refer to the response to OCA/USPS-44(b).

- a. Please confirm that in order to process automation compatible barcoded First-Class and Standard Regular letter-shaped pieces into Delivery Point Sequence (DPS), the Postal Service would use one of the following pieces of equipment: Delivery Barcode Sorter (DBCS), Mail Processing Barcode Sorter (MPBCS) or Carrier Sequence Barcode Sorter (CSBCS). If you do not confirm, please explain and identify all pieces of equipment used to process such letter-shaped pieces into DPS.
- b. Please confirm that only barcoded First-Class and Standard Regular letter-shaped pieces sorted to 5-digit are presented to DBCS, MPBCS and CSBCS for processing into DPS. If you do not confirm, please explain.

**Response:**

(a) Confirmed.

(b) Not confirmed. Barcoded carrier-route presorted letters are presented to the CSBCS. Also, if a barcode clear zone does not exist or the barcode is not readable, letters can be sorted to DPS using ID Code Sortation (ICS). See page 7 of my testimony for more information.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-145**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same DBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.
- f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.
- g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.
- h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**Response:**

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

- (a) Not confirmed. First-Class Mail and Standard Mail are sometimes processed on different sort plans. See response to OCA/USPS-42b. The First-Class sort plans likely involve the use of more stackers in order to hold out more zones and firms for service reasons. I am unaware of any testing conducted to quantify the impacts of these differences on equipment throughput. However, even though the pieces are identical in this example, there are inherent differences in piece characteristics between First-Class Mail and Standard Mail that affect throughput. It is my understanding that the transport velocities remain constant on all letter and flat automation equipment.
- (b) Based on the differences spelled out in part (a) and absent testing, this cannot be confirmed. These differences would likely impact productivity.
- (c) Not confirmed. The wage rates would not be exactly the same due to the time of day that each class of mail is processed. First-Class Mail tends to be processed during Tours I and III when employees earn "premium pay." Standard Mail is more likely to be processed during Tour II. Premium pay adjustment factors are found in USPS LR-J-60.
- (d) Based on the responses to parts (a - c) above, not confirmed.
- (e - g) The responses for parts (a - d) would be the same as above when the additional criteria spelled out in parts (e - g) are individually factored in.
- (h) Not confirmed. Due to mail pieces that are rejected on the first pass and generally a different number of stackers are used in each of the passes.
- (i) Not confirmed. Processing very large quantities of First-Class mail may require different operational procedures than will be required to process the same volume of Standard Mail. This will, in turn, affect the ratio between the Standard Mail



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

productivity (cost) and First-Class productivity (cost). For example, a very large First-Class mailing would have to be run on several parallel machines to clear within the First-Class processing window required to meet service standards. The Standard mailing of the same size might be run on a single machine, or at least a smaller number of parallel machines. Fewer machine set-ups and take-downs for the Standard Mail could increase productivity and reduce cost.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-146**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is *automation compatible*, barcoded, and weighs one ounce. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same MPBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the MPBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.
- f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.
- g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same MPBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same MPBCS.
- h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same MPBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same MPBCS. If you do not do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**Response:**

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

(a – i) The responses to OCA/USPS-145, parts (a – i) respectively, would be the same when considering the MPBCS.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

3313

**OCA/USPS-147**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same CSBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the CSBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.
- f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.
- g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same CSBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same CSBCS.
- h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same CSBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same CSBCS. If you do not do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**Response:**

(a) See OCA/USPS-145(a).

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

(b) See OCA/USPS-145(b).

(c) Assuming the factors in the response to OCA/USPS-145, part (c) are not factors on the CSBCS, since processing typically occurs only on Tour II; this can be confirmed. First-Class Mail and Standard Mail are not processed separately on the CSBCS for DPS processing.

(d) See OCA/USPS-145(d).

(e – g) The responses for parts (a – d) would be the same as above when the additional criteria spelled out in parts (e – g) are individually factored in.

(h) See response to OCA/USPS-145(h).

(i) See response to OCA/USPS-145(i).

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-148** Please refer to the response to POSTCOM/USPS-T39-8(a).

- a. For the DBCS and MPBCS, please describe the algorithm on the first pass and the second pass that permits the processing of letter-shaped pieces into DPS.
- b. For the CSBCS, please describe the algorithm on the first pass, the second pass and the third pass that permits the processing of letter-shaped pieces into DPS.

**Response:**

- (a) On the first pass, the letters are sorted to stackers based on delivery points. For example, the first stacker will contain each carrier's first delivery point; the second stacker will contain each carrier's second delivery point, etc. If there are more delivery points than stackers on the machine, the delivery points will "wrap". For example, the first stacker on the first pass will contain each carrier's first delivery point and some carrier's two-hundred and first point. The number of times the delivery points "wrap" for a specific carrier will determine the exact number of stackers needed for that carrier on the second pass. On the second pass, the order of the trays is maintained from the first pass and the tray containing the first, two-hundred and first, and four-hundred and first, etc. delivery points is feed through first and the letters are sorted to each carrier, with the first, two-hundred and first, and four-hundred and first, etc. delivery points sorted to separate stackers for each carrier, as necessary. See attachment for a diagram.
- (b) Every stop on a delivery route represents a number in the sequence of all of the points on the route in the order that the route is delivered. For example, each stop on a route with 327 delivery points can be assigned a delivery sequence number, one through 327. On the first pass of a CSBCS, the points are sorted off of the units place of the delivery sequence number. For example, the 1st, 11th,

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

21st, through 321st delivery points are sorted to the first stacker; and the second stacker will contain all delivery points with a two in the units place. On the second pass, the trays are feed back in order and are sorted off of the tens place in the delivery sequence number. For example, the first stacker would contain the 10th through 19th, 110th through 119th, etc. delivery points. Finally, the third pass will sort the delivery points of the hundreds place, resulting in a DPS. There are slight variations to this process in order to maximize bin usage and minimize sweep time; however, this represents the basic algorithm. See the attachment.

## DBCS Delivery Point Sequencing Sample Diagram

Using a DBCS with 100 bins available for DPS, 2 passes are required for a sample zone of 14 carrier routes with 620 to 700 possible deliveries each. The following shows how the sort programs assigns the delivery sequence numbers.

### FIRST PASS:

Bin #1	2	3	4	5	.	.	.	98	99	100
1	2	3	4	5	.	.	.	98	99	100
101	102	103	104	105	.	.	.	198	199	200
201	202	203	204	205	.	.	.	298	299	300
.	.	.	.	.	.	.	.	.	.	.
.	.	.	.	.	.	.	.	.	.	.
601	602	603	604	605	.	.	.	698	699	700

Letters are actually in random order within each bin.

Bin 1 includes delivery points 1, 101, 201, etc. for ALL carrier routes in the zone.

Since there is a maximum of 700 possible deliveries per route and only 100 available bins, there are 7 "wraps" around the DBCS in this example.

### SECOND PASS:

Bin #1	2	3	4	5	6	7	...	96	97	98
1	101	201	301	401	501	601	...	401	501	601
2	102	202	302	402	502	602	...	402	502	602
3	103	203	303	403	503	603	...	403	503	603
.	.	.	.	.	.	.	...	.	.	.
.	.	.	.	.	.	.	...	.	.	620
100	200	300	400	500	600	700	.	500	600	.

[ \_\_\_\_\_ Carrier Route #1 \_\_\_\_\_ ]      \_\_\_\_\_ Carrier Route #14 \_\_\_\_\_ ]

Mail from Bin 1 First Pass is fed first on the second pass, then Bin 2, etc. The feed sequence of trays MUST be maintained to get delivery point sequence.

Letters are in carrier walk sequence order within each bin.

Bin 1 includes delivery sequences 1 through 100 for carrier route #1 ONLY. Bins 1 through 7 may have to be consolidated into two or three trays.

Bin 98 includes delivery sequences 601 through 620 for carrier route #14 ONLY.



1st pass	Sort On Unit #								
1	2	3	4	5	6	7	8	9	10
010	001	002	003	024	005	056	087	108	009
200	011	132	013	214	055	086	017	068	079
	021	022	223	034	135	046	257		099
	101	102	123	124	125		237		
	201								
	111								
	211								

[illegible][illegible]

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-149**     Please refer to USPS-LR-J-60.

- a.     At page 52, please confirm that the presort letters mail flow densities are those used for First-Class letter-shaped pieces. If you do not confirm, please explain.
- b.     At page 89, please confirm that the presort letters mail flow densities are those used for Standard Regular letter-shaped pieces. If you do not confirm, please explain.
- c.     Please confirm that the mail flow densities on pages 52 and 89 are the same. If you do not confirm, please explain.
- d.     Please confirm that the identical mail flow densities for First-Class and Standard Regular letter-shaped pieces implies the same sort schemes and the same mail processing operations for First-Class and Standard Regular letter-shaped pieces. If you do not confirm, please explain.
- e.     At page 46, please confirm that the marginal volume variable productivities are those used for First-Class letter-shaped pieces. If you do not confirm, please explain.
- f.     At page 81, please confirm that the marginal volume variable productivities are those used for Standard Regular letter-shaped pieces. If you do not confirm, please explain.
- g.     Please confirm that the marginal volume variable productivities on pages 46 and 81 are the same. If you do not confirm, please explain.
- h.     Please confirm that the identical marginal volume variable productivities for First-Class and Standard Regular letter-shaped pieces implies the same costs for First-Class and Standard Regular letter-shaped pieces undergoing the same mail processing operations. If you do not confirm, please explain.

**RESPONSE:**

- a.     Confirmed.
- b.     Confirmed.
- c.     Confirmed.
- d.     Not confirmed. The use of average data reflect the fact that it is difficult to obtain disaggregated data by class of mail, given that the MODS operation numbers

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**RESPONSE TO OCA/USPS-149 (CONTINUED)**

used for First-Class Mail letters and cards and Standard Mail letters operations are identical. In addition, the application of CRA proportional adjustment factors should "smooth" out any class-specific differences.

- e. Confirmed.
- f. Confirmed.
- g. Confirmed.
- h. Not confirmed. Please see the response to OCA/USPS-149(d).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

**OCA/USPS-150.** Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Bozzo since June 1996.

**RESPONSE:**

The following responsive documents are already on file with the Commission:

Management Operating Data System, Handbook M-32 (See USPS-LR-H-147 in Docket No. R97-1 and USPS-LR-J-165 in this docket).

In-Office Cost System, Handbook F-45 (See USPS-LR-I-14 in Docket No. R2000-1).

Summary Description of USPS Development of Costs by Segments and Components (See USPS-LR-1 in each of the recent rate case dockets).

The following responsive documents may be inspected at Postal Headquarters by making arrangements with counsel for witness Bozzo (Frank Heselton at 202/268-4823 or Eric Koetting at 202/268-2992):

Management Operating Data System, Participant's Guide (Rev. 4/2000)

Managing Images & Mailflows with the Remote Barcode System (Western Area In-Plant Support, July 1996)

The following document was only made available to Dr. Bozzo by Lockheed Martin under a non-disclosure agreement, and is therefore unavailable:

Remote Computer Reader, Parameter Analysis Training (March 1997, Lockheed Martin Federal Systems)

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

**OCA/USPS-153.** Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Van-Ty-Smith since June 1996.

**Response to OCA/USPS-153**

- The IOCS F-45 handbook filed in USPS-LR-I-14/R2000-1 and the supplemental instructions to the F-45 filed in USPS-LR-J-34/R2001-1.
- Summary Description of USPS Development of Costs by Segments and Components for various years (see USPS-LR-1 in each recent rate case).
- MODS handbook M-32 (USPS-LR-H-147 and J-165)

Revised 11/9/01

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

**OCA/USPS-154.** Please provide a list of every document relating to mail processing operations, peak-load costs, or production under uncertainty that was relied on by witnesses Bozzo, Kingsley, or Van-Ty-Smith in the preparation of their testimonies in this docket.

**RESPONSE**

Docket No. R97-1, USPS-T-4 (Moden)

Docket No. R97-1, USPS-T-14 (Bradley)

Docket No. R97-1, USPS-T-12 and USPS-RT-6 (Degen)

Docket No. R97-1, USPS-RT-8 (Steele)

Docket No. R2000-1, USPS-T-10 (Kingsley)

Docket No. R2000-1, USPS-T-15 (Bozzo)

Docket No. R2000-1, USPS-T-16 and USPS-RT-5 (Degen)

Docket No. R2001-1, USPS-T-14 (Bozzo)

Docket No. R2001-1, USPS-T-39 (Kingsley)

Lists of MODS operations in use, FY 1993-FY 2000

Economic and econometric sources cited by Dr. Bozzo in USPS-T-14 (R2001-1) and USPS-T-15 (R2000-1)

The IOCS F-45 handbook filed in USPS-LR-I-14/R2000-1 and the supplemental instructions to the F-45 filed in USPS-LR-J-34/R2001-1.

The IOCS file layout in Appendix A filed in USPS-LR-J-10.

Summary Description of USPS Development of Costs by Segments and Components, FY 2000, filed in USPS-LR-J-1.

11/9/01

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

AP Barcode Report.

Domestic Mail Manual

Postal Bulletin 22016 (Jan. 27, 2000)

PRC Opinions, Docket Nos. R97-1 and R2000-1

Revised November 13, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-156** Please refer to the response to interrogatories OCAIUSPS-12(a) and 13(a).

- a. For each piece of equipment identified in those responses, please provide copies of all documents relating to its staffing, supervision, maintenance, or operation.
- b. For each operation identified in those responses, please provide copies of all documents relating to the activities of employees and their supervisors engaged in that operation.

**Response:**

- a. – b. There are a great number of technical documents concerning the adjustment and repair of mail processing equipment and software. Most, if not all, of these documents contain information that is proprietary to the manufacturer. We interpret your interrogatory as not applying to technical documents of this nature.

LR-I-193 provided: Pub 128 Strategic Improvement Guide for Flats Processing

LR-I-154 provided:

PO-411 Burroughs OCR/CS Operating Guidelines

PO-412 Bell & Howell Bar Code Sorter Operating Guidelines

PO-428 Advanced Facer/Canceler Operating System Guidelines

LR-J-147 provided: Loop Mail Program

LR-J-166 provided: Machine Scheduler LE Users Guide

LR-J-143 provided: Sort Plan System (SPS) Users Guide

LR-J-173 is provided in response to this interrogatory and contains:



Revised November 13, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

AFSM 100 National Standardization Guide (Rev. 1)

AFSM 100 Standardization Supervisor's Guide

A CD-ROM with the following documents that were available in electronic form:

PO401.pdf	Manual Distribution Operations Guidelines
PO413.pdf	Platform Operations
PO420.pdf	Small Plant Best Practices
PO440.pdf	Remittance Mail Processing
PO460.pdf	Domestic-Originating Mail Processing
AFSMSOP.exe	AFSM 100 SOP
Inplant.zip	FSM 1000 In Plant Support Guide
035Policy.doc	Policy Statement for Operation 035
userguide.zip	FSM 1000 Users Guide
zip3sop.doc	SOP for Destinating Processing Plants ADC or SCF
zip5sop.doc	SOP for Destinating Delivery Units
pdssop.doc	Priority Mail Drop Shipments SOP
persop.doc	National Periodical Processing SOP

In addition, the following documents will be obtained from the USPS Material Distribution Center in Topeka, Kansas and provided as LR-J-174 when they arrive:

PO-415 Mail Preparation

PO-416 Presort Mail

Revised November 13, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

PO-417      Opening and Pouching

PO-430      Small Parcel and Bundle Sorter Guidelines

Response of the United States Postal Service to Interrogatories of the Office of the  
Consumer Advocate

**OCA/USPS-157.** Please refer to the attachment to the response to Interrogatory POSTCOM/USPS-T39-10. Please provide National Actual Performance data for all Labor Distribution Codes (LDCs) (not just flats) for FYs 1996 through 2001 by FY by AP by LDC.

**Response:**

The report contained in the attachment to the response to POSTCOM/USPS-T39-10 is not generated for all Labor Distribution Codes. However, the national TPH and hours data that enter into the report are available for LDCs 11-14, by equipment type and AP, for the specified time period. Those data will be provided in LR-J-175.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-158** Please provide current copies of all documents relating to standard operating procedures for any mail processing operation.

**Response:**

See OCA/USPS-156.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-159**

Please refer to the response to Interrogatory OCA/USPS-21(f).

- a. Please explain why no data are available.
- b. Are there LDC or MODS codes for "handwriting recognition" equipment? If so, what are those codes?
- c. Please provide any available data on volumes processed through "handwriting recognition" equipment for FYs 2000 and 2001. To the extent possible, please provide breakdowns by FY by PQ by AP by shape by subclass.

**Response:**

- a. The Remote Computer Read (RCR) system ( which includes "handwriting recognition" equipment), like virtually all MODS operations, does not differentiate/track volumes or workhours by class.
- b. There is no direct labor associated with the RCR, or handwriting recognition. It is equipment *between* the ISS and the keyers at a REC that handle images not resolved by RCR, *not* pieces of mail. Therefore, there are no LDCs or MODs codes other than the ones for feeding pieces on ISSs and OSSs regardless of where the result comes from.
- c. The Remote Computer Read (RCR) system finalizes images for both handwritten and machine printed letters and cards (no other shapes at this time). There is no way to distinguish from the available data whether a letter is handwritten or machine printed, or to identify by class or sub-class.

RCR Finalized the following number of images in FY 2001: 976,675,160 in AP13; 4,139,673,042 in Qtr 4; and 15,318,443,638 for the entire FY.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-160** Please define the terms "clearance time," "critical entry time," and "dispatch of value." Please describe the relationships between these terms and explain how they are determined for a specific plant.

**Response:**

In the context of an operating plan that accommodates input mail flows that arrive over time for processing in a given distribution activity,

- Critical entry time (CET) is the latest clock time at which mail can arrive for induction into a distribution or allied labor operation with assurance that it will be processed and clear the operation in sufficient time to meet the CET of the next sequential activity.
- Clearance time (CT) is the operating plan clock time by which all mail in a given distribution or allied labor activity must be finished and cleared from the activity. CT is usually very soon after the CET; it can be as little as 5 or 10 minutes.
- Dispatch of Value (DOV) is the last (and sometimes only) scheduled transportation trip onto which mail can be put with assurance of meeting service commitments.

The actual operating plan times for activities are driven by overnight service commitments between plants. In practice, operating plan are established to ensure that overnight committed mail from an originating processing facility's most distant delivery unit can be delivered overnight to the most distant delivery unit in the destination processing facility's service area.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-161** Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded and paid a First-Class rate. However, one group weighs one ounce and the other group weighs two ounces.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same Delivery Bar Code Sorter (DBCS). Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.
- f. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a Mail Processing Bar Code Sorter (MPBCS) and a Carrier Sequencing Bar Code Sorter (CSBCS), respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**Response:**

- (a) Not confirmed. See response to MMA/USPS-T39-1 and OCA/USPS-145a. It is highly unlikely that the two groups with different piece weights would be "identical in every respect". In addition to the impact to the throughput described in MMA/USPS-T39-1 due to the piece weight, the pieces could vary in, for example, length. Piece length affects throughput since the average distance between pieces in the transport belts increases as the pieces get longer. Also, as pieces get heavier they tend to get thicker, which could negatively impact the DBCS productivity, since fewer pieces fit in a tray resulting in more trays to feed and sweep. These issues apply to all letter automation equipment used in the Postal Service, independent of the class of mail.
- (b) Not confirmed. If the throughputs differ for the two groups, it would be expected that the productivities would also differ. So, the factors discussed in part (a) and in the response to MMA/USPS-T39-1 would also cause the productivities to differ.
- (c) Confirmed.
- (d) See response to sub-parts (a) and (b) above. If the productivities differ for the two groups, the unit costs would differ. Therefore, the factors discussed in part (a) and in the response to MMA/USPS-T39-1 would cause the productivities to differ and, consequently, the unit costs to differ.
- (e) The responses provided in parts (a), (b), (c), and (d) above also apply if each group is processed in two passes.
- (f) Not confirmed. See response to OCA/USPS-145(h).
- (g) Confirmed.



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

(h) Not confirmed. A very large First-Class mailing would have to be run on several parallel machines to clear within the First-Class processing window required to meet service standards. Since a one ounce mailing would, all else equal, have a higher throughput than a two ounce mailing, it would run on fewer parallel machines and incur fewer scheme changes. Consequently, the one ounce mailing would have a lower cost and higher productivity than the two ounce mailing.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-162** Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and paid a Standard Mail Regular rate. However, one group weighs one ounce and the other group weighs two ounces.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same DBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.
- f. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**Response:**

See response to OCA/USPS-161.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-163**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible and barcoded. However, one group weighs one ounce and paid a First-Class rate, and the other group weighs two ounces and paid a Standard Mail Regular rate.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same DBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.
- f. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the group that paid the First-Class rate weighed two ounces and the group that paid the Standard Mail Regular rate weighed one ounce. If you do not confirm, please explain.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**Response:**

- (a – b) See responses to OCA/USPS-145, sub-parts (a - b) respectively, and OCA/USPS-161 sub-parts (a - b) respectively. The differences discussed in these two responses would also apply when factoring the criteria collectively.
- (c) See response to OCA/USPS-145, sub-part (c).
- (d) See responses to OCA/USPS-145, sub-part (d) and OCA/USPS-161, sub part-(d).
- (e & f) See responses to OCA/USPS-145, sub-parts (g & h) respectively, and OCA/USPS-161, sub-parts (e & f) respectively.
- (g) Confirmed for the MPBCS. For the CSBCS, it is unlikely that the First-Class Mail and Standard Mail would be processed on different sort plans. Therefore, with the exception of the factors spelled out in OCA/USPS-145 sub-part (a) associated with the different sort plans, this can also be confirmed for the CSBCS.
- (h) Not confirmed. See response to OCA/USPS-145, part (i).
- (i) Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-164**

Please refer to the response to OCA/USPS-42(b).

- a. Please confirm that barcoded letter-shaped pieces consisting of pieces paying a First-Class letter rate and a First-Class card rate are typically processed separately until processing into Delivery Point Sequence (DPS). If you do not confirm, please explain.
- b. Please confirm that prebarcoded letter-shaped pieces consisting of pieces paying a First-Class letter rate and a First-Class card rate are typically processed separately until processing into DPS. If you do not confirm, please explain.
- c. Please confirm that for processing into DPS, barcoded and prebarcoded letter-shaped pieces consisting of pieces paying a First-Class letter rate and a First-Class card rate become commingled only on the second DPS pass. If you do not confirm, please explain.

**Response:**

- (a) - (c) Not confirmed. Barcoded First-Class cards and letters are processed together in all outgoing and incoming primary operations. This is also the case with barcoded First-Class business reply cards and letters.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-165**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, one group paid a First-Class letter rate and the other group paid a First-Class card rate.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same DBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.
- f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.
- g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.
- h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- j. Please confirm that the responses to parts a. through i. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**Response:**

- (a) Not confirmed. The pieces paying the First-Class letter rate and the pieces paying the First-Class card rate would not be identical in every respect. Consequently, piece length, thickness, and weight affect throughput. See response to OCA/USPS-145, sub-part (a). Even if the two groups contained pieces with identical dimensions and weight, experience in operations indicates that cards jam less frequently than letters, which has a positive impact on throughput and productivity.
- (b) Not confirmed. See response to OCA/USPS-161, sub-part (b).
- (c) Confirmed.
- (d) See response to OCA/USPS-161, part (d).
- (e – f) The responses for parts (a – d) would be the same as above assuming 2-ounce or 3-ounce pieces in each group. However, pieces claiming card rates must be made of paper or card stock and be not more than 4-1/4 inches high, 6 inches long, and 0.016 inch thick (see DMM C100.2.0). A piece at the maximum allowable dimensions still weighs less than one ounce.
- (g) The responses for sub-parts (a – d) would be the same as above assuming two passes on the same DBCS.
- (h) See response to OCA/USPS-161, sub-part (f).
- (i) Confirmed.
- (j) Not confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-166**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible and barcoded. However, one group weighs one ounce and paid a First-Class card rate, and the other group weighs two ounces and paid a First-Class letter rate.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same DBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.
- f. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the group that paid the First-Class card rate weighed two ounces and the group that paid the First-Class letter rate weighed one ounce. If you do not confirm, please explain.



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**Response:**

(a – i) See responses to OCA/USPS-161 and 165.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-167**

Please refer to the response to OCA/USPS-63.

- a. Refer to the response to part a. Please confirm that "letters with insufficient addresses" generally enter the postal system as collection mail. If you do not confirm, please explain.
- b. Refer to the response to parts b. and d.
  - i. Please provide the base year and test year volume, or an estimate of the volume, of First-Class letter-shaped mail that is entered with the Postal Service via "Retail acceptance personnel;"
  - ii. For the base year and test year, please provide the percent, or an estimate of the percent, of total First-Class letter-shaped mail that is entered via "Retail acceptance personnel;"
  - iii. For the base year and test year, please provide the total volume, or an estimate of the total volume, of mail entered via "Retail acceptance personnel."
- c. Refer to the response to parts b. and d.
  - i. Please identify methods other than "Retail acceptance personnel" by which First-Class letter-shaped mail is entered with the Postal Service;
  - ii. Please provide the base year and test year volume, or an estimate of the volume, of First-Class letter-shaped mail that is entered via each of the methods identified in subpart i.
- d. Refer to the response to part b. Please confirm that "culling equipment" refers to the Advanced Facer Cancellor System (AFCS). If you do not confirm, please explain.
- e. Refer to the response to part b. Please confirm that there is no feature of the AFCS specifically designed to separate letter-shaped pieces that fail to meet the aspect ratio requirements (DMM section C810.2.2.) from the letter-shaped mailstream. If you do not confirm, please explain.
- f. Refer to the response to part b. Please confirm that there is no feature of any other mail processing equipment specifically designed to separate letter-shaped pieces that fail to meet the aspect ratio requirements (DMM section C810.2.2.) from the letter-shaped mailstream. If you do not confirm, please explain.
- g. Refer to the response to part b. Please confirm that there is no feature of any mail processing equipment specifically designed to separate letter-shaped pieces that are subject to the proposed non-machinable surcharge from the letter-shaped mailstream. If you do not confirm, please explain.
- h. Refer to the response to part b. In what mail processing operation are "culling belts" located? Are culling belts a part of, or separate from, any mail processing equipment? Please explain how culling belts separate letter-shaped pieces destined for manual processing from the letter-shaped mailstream.
- i. Refer to the response to part b. Please confirm that culling belts are not capable of separating letter-shaped pieces subject to the proposed non-

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

- machinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain how the culling belts accomplish this separation.
- j. Refer to the response to part b. Please confirm that as "mailhandlers cull manual letters from the collection mailstream," they will not separate letter-shaped pieces subject to the proposed non-machinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain.
  - k. Refer to the response to part b., where it states that letter-shaped pieces "can be diverted to the manual mailstream once . . . sorted to reject stackers." Please confirm that the automation equipment will not separate letter-shaped pieces subject to the proposed non-machinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain how this separation is to be accomplished by the automation equipment.
  - l. Refer to the response to part b., where it states "As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters." Please confirm that full trays of manual letters from bulk mailers will be marked for manual processing pursuant to DMM section M130.1.5. If you do not confirm, please explain.
  - m. Refer to the response to part b., where it states "As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters." Please confirm that the full trays of manual letters arriving from other processing facilities will not be separated into trays of non-machinable letter-shaped pieces subject to the proposed surcharge and trays of other manual letter-shaped pieces. If you do not confirm, please explain.
  - n. Refer to the response to part b., where it states "As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters." Please confirm that within the full trays of manual letters arriving from other processing facilities, the letters will not be separated into non-machinable letter-shaped pieces subject to the proposed surcharge and other manual letter-shaped pieces. If you do not confirm, please explain.
  - o. Refer to the response to part c., where it states that "the Test Year After Rates volumes include an estimate of the additional pieces meeting the proposed non-machinable definition." What proportion of the difference between the Base Year and Test Year After Rates volumes for nonstandard/non-machinable First-Class Single-Piece and Nonautomated Presort Letters is non-machinable (as opposed to nonstandard)?
  - p. Refer to the response to part d. Where nonstandard/non-machinable letter-shaped pieces are not identified by "Retail acceptance personnel," please identify every operation (e.g., Entry Activities; Outgoing Remote Bar Code Sorter (RBCS); Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing and determined to be non-machinable and subject to the proposed non-machinable surcharge. Please explain how the determination is to be made.
  - q. Refer to the response to part d. Where nonstandard/non-machinable letter-shaped pieces are not identified by "Business Mail Entry Unit (BMEU)

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

acceptance personnel," please identify every operation (e.g., Entry Activities; Outgoing RBCS; Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing and determined to be non-machinable and subject to the proposed non-machinable surcharge. Please explain how the determination is to be made.

- r. Refer to the response to parts f. – j., where it states that "Pieces originally determined to be machinable at the retail window or BMEU but determined subsequently to be non-machinable during processing, are intended to be treated similar to the existing nonstandard surcharge pieces." Please confirm that some "existing nonstandard surcharge pieces" are currently processed successfully through the entire automated mail processing system. If you do not confirm, please explain.
- s. Refer to the response to parts f. – j.
  - i. Please provide the base year volume, or an estimate of the volume, of "existing nonstandard surcharge pieces" that are currently processed successfully through the entire automated mail processing system;
  - ii. For the base year, please provide the percent, or an estimate of the percent, of "existing nonstandard surcharge pieces" that are currently processed successfully through the entire automated mail processing system.
- t. Refer to the response to parts f. – j., where it states that "processing personnel assume the pieces have been appropriately charged at entry and will not be marked 'Postage Due.'" Please confirm that only retail and BMEU acceptance personnel will mark Postage Due on letter-shaped pieces subject to the proposed non-machinable surcharge. If you do not confirm, please identify every operation (e.g., Entry Activities; Outgoing Remote Bar Code Sorter (RBCS); Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces will be marked Postage Due.
- u. Refer to the response to parts f. – j., where it states that "processing personnel assume the pieces have been appropriately charged at entry and will not be marked 'Postage Due.'" Please confirm that if letter-shaped pieces subject to the proposed non-machinable surcharge are not identified at the retail window or BMEU, such letter-shaped pieces will not pay the proposed non-machinable surcharge. If you do not confirm, please explain.
- v. Refer to the response to parts f. – j.
  - i. Please provide the base year and test year volume, or an estimate of the volume, of nonstandard/non-machinable letter-shaped mail that is marked Postage Due;
  - ii. For the base year and test year, please provide the percent, or an estimate of the percent, of nonstandard/non-machinable letter-shaped mail that is marked Postage Due;
  - iii. Please provide the base year and test year volume, or an estimate of the volume, of manual letter-shaped mail that is marked Postage Due;
  - iv. For the base year and test year, please provide the percent, or an estimate of the percent, of manual letter-shaped mail that is marked Postage Due.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

- w. Refer to the response to parts f. – j. Please confirm that because not all nonstandard/non-machinable letter-shaped pieces will be identified by retail and BMEU acceptance personnel, the Test Year After Rates revenue estimates for the proposed non-machinable surcharge are overstated. If you do not confirm, please explain.

**Response:**

- (a) Not confirmed. Though many do enter through the collection mailstream, many also enter as part of bulk mailings.
- (b) i. – iii. Postal data collection systems do not capture whether a stamped First-Class Mail letter was dropped in a collection box, picked up by the carrier, or handed across a retail counter. Therefore, data indicating how First-Class Mail letters are entered are not collected, and information on which to base an estimate is not available.
- (c) i. Other methods by which First-Class letter-shaped mail may be entered include: by collection boxes, carrier pick-ups at delivery points, collection routes, bulk mail entry units, or acceptance at a mailer's plant, where the mail is then loaded onto postal transportation through a plant load agreement.
- ii. See response to subpart (b) above.
- (d) Not confirmed. Culling equipment refers to the Dual Pass Rough Cull equipment as well as the culling belts that are staffed by mailhandlers that precede the AFCS equipment in the mail prep operation.
- (e) Confirmed.
- (f) Confirmed.
- (g) It can be confirmed that mail processing equipment has not been designed and, consequently, will not be relied upon to separate letter-shaped pieces that are subject to the proposed non-machinable surcharge based on number of

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

different criteria. However, if pieces subject to the proposed non-machinable surcharge get fed into the letter mail processing equipment, they will most likely jam the machine (*e.g.*, because they are too rigid) or be damaged (*e.g.*, because they contain an enclosed pen or are too flimsy).

- (h) Culling belts are located in the mail prep operation, also known as the "010" operation. Culling belts are typically separate from mail processing equipment; however, the feed end of AFCS equipment is also designed to mechanically cull pieces that are too thick, tall, or long in case they were missed by the Dual Pass Rough Cull or on the manual culling belts. Manual pieces exceeding the *maximum dimensions will be mechanically culled by the Dual Pass Rough Cull or the AFCS*. Other manual pieces will be culled on the manual culling belts. For example, square, flimsy, and wooden postcards could be culled, then hand cancelled, and finally sent to a manual operation.
- (i) Not confirmed. See response to subpart (h) above.
- (j) Confirmed.
- (k) Confirmed. For example, a flimsy postcard can be rejected to a stacker with other unreadable manual letters, if it does not jam the machine first.
- (l) Not confirmed. Presorted letters that are marked for manual processing pursuant to DMM M130.1.5 likely have certain automation-compatible characteristics and are likely to be processed on automated equipment, unless the customer specifically requests manual processing. Though not restricted from using the marking, it was not intended to be required for use by mailers of pieces that obviously require manual processing.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

- (m) Confirmed. Non-machinable letter-shaped pieces subject to the proposed surcharge will be processed together with other manual letter-shaped pieces at processing facilities.
- (n) See response to subpart (m) above.
- (o) Please see to USPS-T-29, Attachment C, pg. 1. The Test Year Before Rates volume includes only the nonstandard pieces and the Test Year After Rates includes both the nonstandard and non-machinable.
- (p) Letter-shaped pieces are separated for manual processing at the mail prep and opening unit operations as well as every automated letter operation prior to dispatch to the delivery units. In the mail prep and opening unit operations, mailhandlers will separate manual letters at the culling belts or full trays of manual letters arriving from other facilities or through the BMEU. At automation operations (e.g. DBCSs, MPBCSs, etc.), the feeder will cull manual letters before they get fed on the machine and the sweeper will pull if jammed or damaged in the reject stacker(s).
- (q) See response to sub-part (p) above.
- (r) Not confirmed. See USPS-T-22, page 30 at lines 9-19. Even though a barcode may appear on a non-standard piece, that does not imply that it was processed successfully through the entire automated system.
- (s) The Postal Service does not have data responsive to this request.
- (t) Not confirmed. As stated in the response to parts (f – j), it can be confirmed that bulk mailings with permit imprints do not indicate the postage paid on the piece, and therefore, processing personnel assume the pieces have been appropriately charged at entry and will not be marked "Postage Due". For these

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

mailings, BMEU acceptance personnel are responsible for collecting the proper postage upon acceptance. Clerks and carriers also mark pieces postage due.

- (u) Not confirmed. It can be confirmed that, for bulk mailings with permit imprints that do not indicate the postage paid on the piece, BMEU acceptance personnel will be solely responsible for ensuring that the proper postage is paid prior to acceptance. However, processing personnel (e.g., supervisors, nixie clerks, etc.) and carriers handling nonstandard/non-machinable mailings could mark the piece postage due and the surcharge would subsequently be paid.
- (v) The Postal Service does not have data responsive to this request.
- (w) Not confirmed. Test-year-after-rates volumes are estimated based on 1997 Mail Characteristics Study data which estimate the number of letter-shaped pieces that are non-machinable. As noted in USPS-T-29 at page 24, footnote 15, "[t]he proportion used for the volume of non-machinable mail is based solely on the physical characteristics of the mail piece. Some additional (unquantified) volume would be subject to the non-machinable surcharge as a result of manual processing operations." In addition, errors in postage payment will include overpayment of postage as well as underpayment of postage.



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-168**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded, and weighs two ounces. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same Advanced Flat Sorting Machine (AFSM) 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each flat-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group weighed 3 ounces.
- f. Assume the same facts above and in part a., except that each flat-shaped piece in each group weighed 4 ounces. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group weighed 4 ounces.
- g. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a. through f. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- h. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the two groups were processed on a Flat Sorting Machine (FSM) 881 and a Flat Sorting Machine (FSM) 1000, respectively. If you do not confirm, please explain.
- j. Please confirm that the responses to parts a. through i. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**RESPONSE:**

- (a) Not confirmed. All of the factors spelled out in the response to OCA/USPS-145, subpart (a) also apply to flat mail and the AFSM 100. Further, it should be noted that First-Class Mail and Standard Mail flats are unlikely to be identical in every respect. Many Standard Mail flats are catalogs with bound edges, while most First-Class Mail flats are enveloped. Though not specifically studied, these differences are likely to have an impact on the AFSM 100 operation.
- (b) Based on the differences spelled out in OCA/USPS-145, subpart (a), which also apply to this scenario, and absent testing, this cannot be confirmed. Similar to letter automation operations, these differences would likely impact productivity.
- (c) Not confirmed. See response to OCA/USPS-145, subpart (c).
- (d) Based on the responses to parts (a - c) above, not confirmed.
- (e - g) The responses for subparts (a - d) would be the same as above when the additional criteria spelled out in subparts (e - g) are individually factored in.
- (h) Not confirmed. See response to OCA/USPS-145, subpart (h). This response is also applicable to flat mail processing.
- (i) Confirmed.
- (j) Not Confirmed. See response to OCA/USPS-145, subpart (i). This response is also applicable to flat mail processing.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-169**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded and paid a First-Class rate. However, one group weighs two ounces and the other group weighs three ounces.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a FSM 881 and a FSM 1000, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.

**RESPONSE:**

- (a) Absent empirical data or a specific study, this cannot be confirmed. However, using the example given and the fact that there are no mechanical differences in

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

how the AFSM 100 feeds, transports, and sorts pieces of different weights, there should be no significant difference in the throughputs and velocities.

(b) Not confirmed. See response to subpart (a) above.

(c) Confirmed.

(d) Based on the responses to subparts (a & b) above, not confirmed.

(e) The responses for subparts (a – d) would be the same as above when the additional criterion spelled out in subpart (e) is also factored in.

(f) Not confirmed. The costs would differ due to mail pieces that are rejected on the first pass. In addition, generally a different number of stackers would be used on two passes.

(g) Confirmed.

(h) See response to OCA/USPS-161, subpart (h). This response is also applicable to flat mail processing.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-170**

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded and paid a Standard Mail Regular rate. However, one group weighs two ounces and the other group weighs three ounces.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a FSM 881 and a FSM 1000, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.

**RESPONSE:**

(a – g) See responses to OCA/USPS-169, subparts (a – g). These responses would also apply to Standard Mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

(h) Not confirmed. Although the hypothetical presented in this question assumes only Standard mail, the magnitude of these volume figures introduces service considerations similar to those discussed in the response to OCA/USPS-161(h).

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-171** Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible and barcoded. However, one group weighs two ounces and paid a First-Class rate, and the other group weighs three ounces and paid a Standard Mail Regular rate.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a FSM 881 and a FSM 1000, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the group that paid the First-Class rate weighed three ounces and the group that paid the Standard Mail Regular rate weighed two ounces. If you do not confirm, please explain.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**RESPONSE:**

(a - g) See responses to OCA/USPS-168, subparts (a – d) & (g - i); and OCA/USPS-169, subparts (a – g).

(h) Not confirmed. See response to OCA/USPS-145, subpart (i). This response would also apply to flat mail processing.

(i) Confirmed.



**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-173.** Please refer to the response to interrogatory OCA/USPS-95. Please provide a response that normalizes for

- a. PQ4 (e.g., multiply by 0.75) to take account of the fact that PQ4 has 4 APs and the other PQs have 3 APs;
- b. Census 2000 mailings;
- c. Other adjustments performed by Postal Service cost, volume, and revenue witnesses, including data systems witnesses and forecasting witnesses, to account for nonrecurring events.

**RESPONSE:**

The data below provide a response to OCA/USPS-95, after deflating values for PQ4 by multiplying them by a factor of 0.75. Information or analysis necessary to implement the other types of normalization suggested by the question do not exist.

a. cards and letter-shaped pieces

**HIGH VOLUMES**

1999 PQ 2	32,970M
2000 PQ 3	34,783M
2001 PQ 1	35,129M

**LOW VOLUMES**

1999 PQ 4	30,723M
2000 PQ 4	31,519M
2001 PQ 4	32,883M

b. flat shaped pieces

**HIGH VOLUMES**

1999 PQ 1	11,032M
2000 PQ 1	11,645M
2001 PQ 1	12,634M

**LOW VOLUMES**

1999 PQ 2	9,178M
2000 PQ 2	9,831M

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

2001 PQ 4 10,063M

c. nonletter/nonflat-shaped pieces.f

HIGH VOLUMES

1999 PQ 1 786M

2000 PQ 2 791M

2001 PQ 2 794M

LOW VOLUMES

1999 PQ 4 751M

2000 PQ 4 684M

2001 PQ 4 676M

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-174** In the letter-shaped mailstream, is there a correlation between

- a. weight and thickness of mail pieces?
- b. thickness of mail pieces and the rate at which stackers fill?
- c. thickness of mail pieces and mail processing labor costs?
- d. other mail piece characteristics (not weight or thickness) and mail processing labor costs?
- e. Please provide copies of any documents that support the responses to Parts a. through d., above. If no documents are available, please provide an explanation of the responses.

**RESPONSE:**

- (a) The Postal Service does not have a study that specifically analyzes this correlation. However, this does seem intuitive.
- (b) Yes. Piece thickness correlates with the number of pieces that will fit in each stacker, the frequency that stackers must be swept, and the frequency of removing full trays and replacing them with empty trays.
- (c) There are no studies that analyze this specific correlation. However, with the impact that 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 and, consequently, labor costs.
- (d) Yes. Address and barcode quality also impact labor costs. If the address or barcode cannot be resolved by the OCR/BCR, and the piece must be processed offline via RCR or RBCS (see USPS-T-39, pages 4 -6) or manually; this will impact labor costs. Also, mail piece characteristics other than weight and thickness that force letters to be processed manually also impact labor costs. Examples of such characteristics can be found at USPS-T-39, pages 9 and 10.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

(e) No supporting documentation is available. Explanations are provided in subparts

(a – d) above.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-175** Please refer to the response to interrogatory OCA/USPS-44 and to the attachment thereto.

- a. For each piece of equipment tested (i.e., ECA optical character reader (OCR), Pitney Bowes OCR, Burroughs OCR, ECA bar code sorter (BCS), Bell & Howell BCS), please provide the number currently in normal service in mail processing facilities.
- b. Please confirm that mail piece characteristics other than weight (i.e., thickness, length, height, and aspect ratio) were varied simultaneously with weight during data collection. If you do not confirm, please explain.
- c. Please provide copies of any documents relating to the correlation between letter-shaped mail piece weight and mail processing equipment performance.
- d. The following statement appears at page three of the Attachment (emphasis added):

Tests were conducted both with pure runs as well as intermixed with ***the existing mail base***, and the same conclusion was reached- throughput decreased as the heavier mail is fed. Has this statement been corroborated since February 15, 1994? If so, please provide copies of any documents related to such corroboration.

- e. Please reconcile the statement quoted in Part d., above, with the response to Part b. of interrogatory OCA/USPS-44.
- f. Please provide copies of any Engineering Center documents dated after February 15, 1994, relating to the affect on mail processing equipment of mail piece characteristics.

**RESPONSE:**

- (a) See response to OCA/USPS-172, subpart (a).
- (b) Confirmed for thickness, which varied simultaneously with weight. Not confirmed for other variables.
- (c – d) See *3.5 ounce Heavy Letter Mail Field Evaluation Report* attached.
- (e) OCA/USPS-44, subpart (b), asks that it be confirmed that the data provided in OCA/USPS-44, subpart (a) would be the same for barcoded First-Class letter-shaped pieces and barcoded Standard Mail letter-shaped pieces of a given

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

weight. The response to OCA/USPS-44, subpart (a), pointed to the study, which contained the statement included in subpart (d) of this interrogatory. This statement and the response to OCA/USPS-44, subpart (b) are recognizing the fact that the decreases in throughput realized in the test were due to heavy *test* mail pieces ("standard #10 envelopes stuffed with inserts") intermixed with the existing mail base. Actual heavy First-Class and Standard Mail letters were not tested. Consequently, the results of this test cannot be used to confirm that actual heavy First-Class Mail versus Standard Mail letters, which have different characteristics, would yield similar results.

(f) See subparts (c) and (d).



## 3.5 ounce Heavy Letter Mail Field Evaluation Report

April 6, 2001  
Technology Development and Applications  
Engineering

## **Introduction and Background Information**

Since 1994 the U.S. Postal Service has accepted and discounted automation compatible mail that weighed as much as 3.3 ounces. Following a request from mailing industry representatives, the U. S. Postal Service agreed to conduct a test to determine the feasibility of raising the weight limit for automation compatible mail from 3.3 to 3.5 ounces. To make this determination test decks were obtained from a commercial mailing house. Mail pieces within the test deck were designed around a strict criterion, written by U.S.P.S. Engineering. This was done to eliminate those aspects, of currently accepted heavy mail pieces, that have proven to be problematic. The test was conducted at two geographic locations, Fort Myers Fl. and the suburbs of Philadelphia, Pennsylvania. At each location, two field sites participated in the test, a P&DC and a local Delivery Unit. In each P&DC mail was run on the MPBCS and the DBCS. In the Delivery Units, mail was run on the CSBCS. The test was conducted between 4/20/99 and 5/13/99. The goals and objectives of the test were as follows:

- To assess the impact of the 3.5 ounce mail on the automation equipment's ability to sort mail.
- To determine the degree to which the heavier mail affects the ergonomics of mail handling.
- To study the influence of the heavier mail upon the overall operational environment.
- To ascertain the extent to which the heavier mail will increase equipment maintenance costs.
- To provide data to be used in the processing cost comparison of the 3.5 oz. versus the 3.3 oz. mail.
- To do preemptive testing on 3.7 ounce mail for future reference.

## **Test Plan**

Six types of test decks were prepared for the test. Their contents were as follows:

- Test Deck 1 – 1 ounce letters with a 2% mix of 3.3 ounce letters.
- Test Deck 2 – 1 ounce letters with a 2% mix of 3.5 ounce letters.
- Test Deck 3 – all 3.3 ounce letters.
- Test Deck 4 – all 3.5 ounce letters.
- Test Deck 5 – all 3.7 ounce letters
- Test Deck 6 – 1 ounce letters with a 2% mix of 3.7 ounce letters.

The test consisted of daily test deck volume runs on the aforementioned equipment. Throughput, accept, reject, error, flyout, damage and jam rates were recorded. All mail pieces were manually examined for sort accuracy, stacker count and mail damage. The effect of the heavy mail on equipment maintenance was also evaluated. An Ergonomic evaluation was conducted as part of the test. Hour long volume runs were conducted to simulate the handling and fatigue conditions operators will experience during continuous processing of heavy mail.

---



## Observations and Test Results

The following are observations made during the test and summarized results based on the reduction of the raw data taken:

- As was expected, the 2% seeded decks of 3.3, 3.5 and 3.7 ounce mail processed extremely well and were no cause for concern.
- Test decks of 100% 3.7 ounce mail caused excessive amounts of damage to the equipment. Because of this, processing of the 3.7 ounce test decks was discontinued. Because of this, it is recommended that any future request to raise the weight limit above 3.5 ounces should be rejected as impractical given the current configurations of USPS mail processing equipment.
- CSBCS runs of 100% 3.3 and 3.5 ounce mail placed an enormous burden on the operators because of excessive overflow conditions. If volumes of pure heavy mail trays that reach delivery units grow to a level comparable to that processed during this test, sites may find their operations debilitated, given their current sweeping practices.
- Given that 3.3 ounce mail pieces are currently being accepted, the "worst case" comparison that this test examined was that of the performance of 100% 3.3 ounce mail versus 100% 3.5 ounce mail. The table below summarizes the results of this "worst case" condition.

	100% 3.3 OZ	100% 3.5 OZ	DELTA
<b>→CSBCS←</b>			
<b>FORT MYERS D.U.</b>			
THROUGHPUT	2,682 PIECES	2,474 PIECES	
ACCEPT RATE	96.90%	97.70%	0.80% INCREASE
ERROR RATE	1.02%	0.06%	0.96% DECREASE
JAM RATE	0.34%	0.55%	0.21% INCREASE
<b>BLUE BELL D.U.</b>			
THROUGHPUT	2,671 PIECES	2,726 PIECES	
ACCEPT RATE	97.80%	98.60%	0.80% INCREASE
ERROR RATE	0.02%	0.00%	0.02% DECREASE
JAM RATE	0.22%	0.82%	0.6% INCREASE
<b>→DBCS←</b>			
<b>FORT MYERS P&amp;DC</b>			
THROUGHPUT	13,738 PIECES	11,269 PIECES	
ACCEPT RATE	97.70%	96.90%	0.80% DECREASE
ERROR RATE	0.00%	0.06%	0.06% INCREASE
JAM RATE	0.20%	0.24%	0.04% INCREASE
<b>SEPA P&amp;DC</b>			
THROUGHPUT	14,075 PIECES	15,347 PIECES	
ACCEPT RATE	98.50%	98.80%	0.30% INCREASE
ERROR RATE	0.00%	0.00%	NO DELTA
JAM RATE	0.10%	0.11%	0.01% INCREASE
<b>→MPBCS←</b>			
<b>FORT MYERS P&amp;DC</b>			
THROUGHPUT	14,293 PIECES	9,906 PIECES	
ACCEPT RATE	98.30%	98.60%	0.30% INCREASE
ERROR RATE	0.00%	0.00%	NO DELTA
JAM RATE	1.47%	0.92%	0.55% DECREASE
<b>SEPA P&amp;DC</b>			
THROUGHPUT	11,977 PIECES	13,184 PIECES	
ACCEPT RATE	96.70%	98.70%	2.00% INCREASE
ERROR RATE	0.01%	0.00%	0.01% DECREASE
JAM RATE	0.92%	0.43%	0.49% DECREASE

Spreadsheets containing all test run data are available from Terry Gingell or Thomas Potter at Engineering.

*Attachment to OIA/USPS-175 4/6/4*

- As can be seen from the table, the performance differences between 3.3 ounce and 3.5 ounce mail pieces were marginal.
- The test revealed no increase in maintenance requirements due to the running of 3.5 oz. versus 3.3 oz. mail. However, it should be noted that the relatively short duration of the test could not reveal the long-term effects that the equipment may experience.
- The difference in throughput rates, error rates, and jam rates for the 3.5 oz. test decks and the 3.3 oz. test decks were negligible. However, it should be noted that throughput rates for both the 3.3 oz. and 3.5 oz. test decks were significantly lower than the typical throughput rates for 1 oz. letter mail.

### **Recommendations**

The U. S. Postal Service should consider increasing, with conditions, the weight limit for automation compatible letter mail from 3.3 ounces to 3.5 ounces. The conditions for this increase are as follows:

- The DMM should be amended to restrict the design of 3.5 oz. mail pieces. The purpose of these restrictions is to eliminate mail piece design that renders mail essentially nonmachinable in spite of the fact that it has been given an automation compatible discount. The following mail piece restrictions should be codified for inclusion in the DMM at the time of the next rate case:
    - 1) Maximum mail piece thickness should not exceed 0.255 inches. Mail piece thickness should not vary more than 15% over the surface of the mail piece.
    - 2) Size A8 envelopes (8.12 x 5.5) should be prohibited.
    - 3) The use of envelope windows, particularly open windows, should be prohibited.
    - 4) Envelope material should be no less than 28 lb. basis weight paper.
    - 5) Envelopes should be trayed using USPS white/red plastic corrugated EMM trays.
    - 6) Insert shift in the lengthwise direction should not exceed a maximum of .562 inches.
  - Ergonomic concerns may be minimized by a directive to the field requiring that incoming trays of heavy mail be mixed with trays of lighter mail. Such a procedure will limit the risks, faced by the equipment operators, of lifting and repetitive motion injuries inherent in the continuous handling of heavy mail.
  - Consideration should be given to the potential that heavy mail volume that reaches the CSBCS machines in Delivery Units might rise to an unmanageable level. Before this occurs the current methods of operation should be reevaluated.
-

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**OCA/USPS-176** Please refer to the response to OCA/USPS44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect but one. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, the pieces in one group are twice as thick as the pieces in the other group.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same Delivery Bar Code Sorter (DBCS). Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.
- f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.
- g. Assume the same facts above and in part a. Please confirm that the thicker pieces would fill twice as many trays per hour.
- h. Please confirm that the responses to Parts a. through g. would be the same where the two groups were processed on a Mail Processing Bar Code Sorter (MPBCS) and a Carrier Sequencing Bar Code Sorter (CSBCS). If you do not confirm, please explain.
- i. Please confirm that the responses to Parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

**RESPONSE:**

- (a) Not confirmed. See responses to OCA/USPS-174, subparts (b and c). Also, while unaware of testing specific to piece thickness, experience has shown that thicker pieces tend to jam more frequently. Jams negatively impact throughput and productivity.
- (b) Not confirmed. See response to subpart (a) above. Based on the impact each group would have on the increased rate at which trays need to be fed, stackers filled, full trays swept and replaced with empty trays, as well as, the number of jams, it would be expected that the productivities would differ.
- (c) Confirmed if the two groups are of the same class.
- (d) Not confirmed. See response to subparts (a) and (b) above. If the productivities differ for the two groups, the total and unit costs would differ.
- (e and f) Responses provided in parts (a), (b), (c), and (d) above also apply if each group weighed 2 ounces or 3 ounces.
- (g) Not confirmed. If the jam rate increases with piece thickness, it would be expected that pieces twice as thick would fill more trays per hour, but something short of twice as many per hour.
- (h) Confirmed.
- (i) Not confirmed. See the responses to OCA/USPS-161, subpart (h) and OCA/USPS-170, subpart (h). Assuming the thicker pieces have a lower throughput, the issues spelled out in these responses would also apply in this example.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-177

The following interrogatory refers to your response to OCA/USPS-75.

- (a) Please provide the number of Postal Service vending machines in the United States.
- (b) Please explain why only 5,000 vending machines currently offer coils of basic First-Class Mail stamps.
- (c) Please explain when all Postal Service vending machines within the United States will dispense "coils" of basic First-Class stamps.
- (d) What criteria does the Postal Service use in determining when to offer coils of basic First-Class stamps in a vending machine?

RESPONSE:

- (a) 31,000.
- (b) All machines are not configured to dispense coils of basic First-Class Mail stamps, due to space/slot restrictions. Those machines that have adequate space to dispense coils have been configured to do so.
- (c) All machines are not capable of dispensing coils and cannot be retrofitted to so do.
- (d) The coils are a basic recommended product; local demand determines if coils will be sold in those machines capable of dispensing them.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-178.** The following interrogatory concerns shipping chicks and other baby birds.

- (a) Please confirm that FedEx will not handle the shipment of chicks or other small animals via Priority Mail. If you are unable to confirm, please explain.
- (b) Please explain how the USPS currently handles requests from mail-order hatcheries to ship chicks, baby birds and other small animals via Priority Mail.

**RESPONSE:**

- (a) Confirmed.
- (b) Live animals may be sent as Priority Mail as permitted in Domestic Mail Manual (DMM) C022.3.0 and based on the Postal Service's ability to arrange transportation. Priority Mail containing live animals may only be routed by air transportation when a mailer can meet the conditions cited in Postal Bulletin 22061, dated October 18, 2001 (attached). Currently, Delta, Continental, US Airways and Kitty Hawk accept live animals; Northwest will accept live animals with the exception of baby chicks.

Also, on November 12, 2001, the President signed into law an amendment to section 5402(d) of Title 39 authorizing the Postal Service to "require any air carrier to accept as mail shipments of day-old poultry and such other live animals as postal regulations allow to be transmitted as mail matter." This authority, however, does not apply if the carrier "commonly and regularly" refuses to accept any live animals as cargo.

## Domestic Mail

### REMINDER

#### Ongoing Political Campaign Mailings

Several states are conducting elections for statewide and local offices this Fall, and some are conducting special elections for open congressional seats. Campaign mailings for those elections are already being entered into the mail-stream, and they will continue to grow in volume in the coming weeks.

*Postal Service managers and employees:* Please ensure that you successfully prepare, accept, document, process, and deliver those important mailings.

*Managers:* Review the political campaign mail procedures documented in *Postal Operations Manual (POM)* 492, Political Campaign Mail. The online version of that POM chapter may be accessed through the Policies and Procedures page of the corporate intranet at <http://blue.usps.gov/cpm>; click on *Manuals*.

— Government Relations,  
Government Relations and Public Policy, 10-18-01

### CORRECTION

#### Transportation of Live Animals

Please disregard the article titled "Notice: Transportation of Live Animals" in Postal Bulletin 22060 (10-4-01, pages 24-25). That article listed the incorrect AMC/AMF contact names and phone number for Los Angeles, CA. The correct name and phone number appear in bold in the table shown on page 9.

In response to new Federal Aviation Administration restrictions, the Postal Service is required to adjust the service it provides for the transportation of live animals.

The Postal Service will continue to accept live animals that do not require delivery within a 72-hour period, such as earthworms, lizards, snails, crickets, grasshoppers, and bees, which can move on ground transportation.

In addition, the Postal Service will continue to accept live animals for which the postage is \$3.50 or less for shipment via air transportation.

The Postal Service will provide limited service for live animals for which the postage is more than \$3.50 and that require air transportation, such as day old poultry, adult poultry, and queen honeybees. This service will be available to and from the airports listed in the table below. The customer must present the mail to the applicable AMC/AMF no later than the cut-off time listed below (all times are local). Service will be available from Monday through Friday from the airports listed below.

Mail containing live animals for which the postage is more than \$3.50 should only be accepted at an AMC/AMF, or a retail unit or P&DC as authorized by the AMC/AMF manager. Employees accepting live animals that must be moved on air transportation must contact the appropriate AMC/AMF personnel to ensure that adequate space will be available and that the animals will reach their destination within the required time frame (see DMM C022.3.0). Mailers tendering live animals are also encouraged to contact the appropriate AMC/AMF personnel to facilitate the delivery of service. The list of AMC/AMF contacts in each city is listed below.

ATTACHMENT  
OCA/USPS-178  
Page 2 of 2

PAGE 9

## POSTAL BULLETIN 22061 (10-18-01)

City	Airport Code	Cut-Off Time	AMC/AMF Contact	Phone Number
Atlanta, GA	ATL	10:45 p.m.	Alton Smith Jacqueline Hicks	404 765-5480
Baltimore, MD	BWI	10:30 p.m.	Rodney Thorington	410 859-2356
Boston, MA	BOS	8:45 p.m.	Terry McWade Steve Cardillo	617 567-0084
Charlotte, NC	CLT	8:30 p.m.	Woodrow McManus Henry Gaddy	704 359-8973
Dallas, TX	DFW	8:00 p.m.	Steve Inglett Olivia Gutierrez	972 456-2000
Denver, CO	DEN	8:30 p.m.	Tom Lujan Dale Wanrow	303 342-3720
El Paso, TX	ELP	7:45 p.m.	Manny Martinez Patsy Green	915 780-7543
Houston, TX	IAH	6:15 p.m.	Ed Martindale Mary Watson Doris Falke	281 443-6350
Huntsville, AL	HSV (Outbound only)	10:00 p.m.	George Hulan Carol Anne Mierzejewski	256 461-6613
Kansas City, MO	MCI	9:00 p.m.	William Cooper Phyllis Kagay Bonnie Roberts	816 243-5751
Los Angeles, CA	LAX	5:00 p.m.	Barbara E. James	310 337-8727
Miami, FL	MIA	7:00 p.m.	Dan Switzer Mary Taylor	305 869-5080
Minneapolis, MN	MSP	7:00 p.m.	Ron Gustafson Sue Lambertz	651 293-3136
Nashville, TN	BNA	9:30 p.m.	Joann Scala Renita Darwin	615 872-5766
Newark, NJ	EWR	8:30 p.m.	Alix Bertrand Don Chesney	973 824-6276
Orlando, FL	MCO	8:45 p.m.	Bob Teal Sam Glover	407 826-5660
Philadelphia, PA	PHL	9:05 p.m.	Ramona Hickman Paul Tiltger	215 937-5600
Phoenix, AZ	PHX	5:00 p.m.	Denise Giltanders Deb Grzyb	602 244-9177
Portland, OR	PDX	4:15 p.m.	Linda Nagely Mikeal Kinder	503 335-7910
Seattle, WA	SEA	6:00 p.m.	Kenn Messenger Jerry Dougal	253 437-4200

— Modal Operations and Requirements,  
Network Operations Management, 10-18-01



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.**

OCA/USPS-179. For FY 2002, please provide a copy of the advertising copy as well as a copy of each radio and TV script used to market (a) Priority Mail and (b) Express Mail.

**RESPONSE**

Please see the attached two pages. These are the only responsive ads for FY 2002.

DEAR MR. FORGETFUL:  
YOU MIGHT NEED  
THE PRODUCT FOR  
THE PRODUCT DEMO.

Anna (your assistant)  
Palo Alto, CA

UNITED STATES  
POSTAL SERVICE

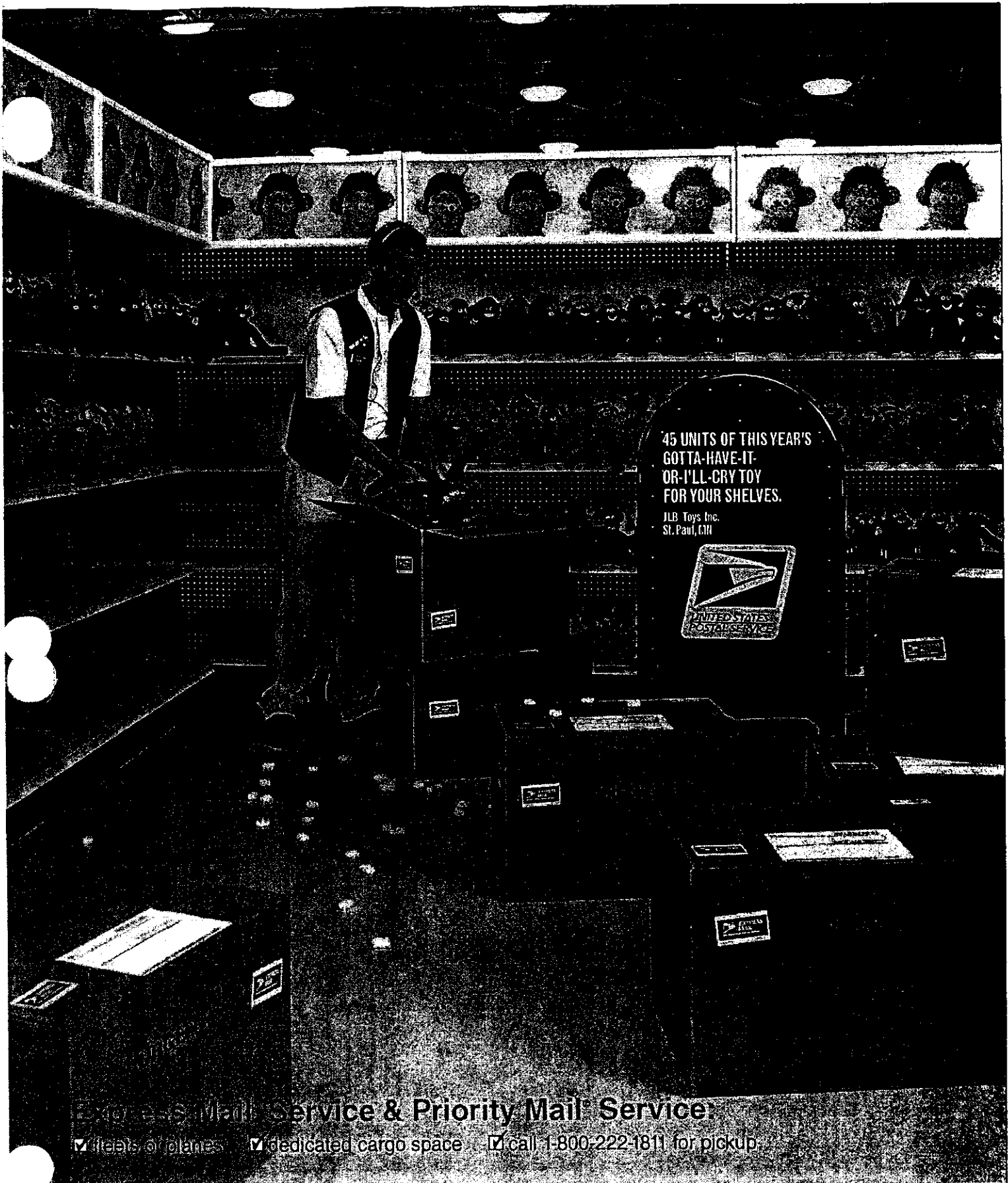
EXPRESS  
MAIL

**Express Mail® Service & Priority Mail® Service:**

☒ fleets of planes  
 ☒ dedicated cargo space  
 ☒ call 1-800-222-1811 for pickup

The U.S. Postal Service is everywhere so you can be anywhere™  
[www.usps.com](http://www.usps.com)

Visit us in booth #959



45 UNITS OF THIS YEAR'S  
GOTTA-HAVE-IT-  
OR-I'LL-CRY TOY  
FOR YOUR SHELVES.  
JLB Toys Inc.  
St. Paul, MN

UNITED STATES  
POSTAL SERVICE

**Express Mail Service & Priority Mail Service**

✓ fleets of planes    ✓ dedicated cargo space    ✓ call 1-800-222-1811 for pickup

The U.S. Postal Service is everywhere so you can be anywhere.  
[www.usps.com](http://www.usps.com)

RESPONSES OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

**OCA/USPS-182.** The following refers to the USPS response to OCA/USPS-83.

- (a) Please provide a copy of the USPS Handbook PO-250, Consumer Answer Book.
- (b) Please provide a copy of the USPS Handbook PO-102, Retail Vending Operational and Marketing Program, Chapter 8, Customer Complaints.
- (c) Page 4 of the Attachment to the response to OCA/USPS-83 indicates that the Customer Complaint Control Log has a column titled "Subject," please explain how USPS personnel categorize complaints into "subjects." What guidelines are USPS personnel given to categorize complaints?

**RESPONSE:**

- (a) See USPS-LR-J-185. The Handbook provided is the most recent version, printed in 1994. It is out of date and not widely available in the field, which is why consideration is currently being given to the production of an updated version. The Handbook is not relevant to these proceedings, even under the more recent expansion of relevance by the Presiding Officer. However, the Postal Service has chosen to provide it rather than engage in motions practice at this time. The Postal Service reserves the right to object to any follow-up questions regarding its content.
- (b) See USPS-LR-J-185. Once again, the Postal Service does not concede the relevance of this Handbook chapter, and accordingly reserves its right to object to any follow-up questions pertaining to it.
- (c) The only guidelines provided are contained in Management Instruction, PO-250-93-2, a copy of which was attached to the Response of the Postal

RESPONSES OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

Service to Interrogatories of the Office of Consumer Advocate, OCA/USPS-

83.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-183. Please refer to the "Management Instruction, PO-250-93-2" attached to the Postal Service's response to interrogatory OCA/USPS-83.

- a. Under a paragraph labeled "Background," a reference is made to "The Customer Satisfaction Index." Is this the same customer satisfaction index requested in any earlier OCA interrogatories? If so, which interrogatories? Please provide a full description of "The Customer Satisfaction Index" referred to in the "Background" paragraph. Also, please provide a full description of the data collected by this index, giving examples, and the types of reports that are routinely made from the "Customer Satisfaction Index." In addition, describe fully the individuals or organizations sampled and how the data are collected.
- b. In the "Background" paragraph, the statement is made: "The Customer Satisfaction Index points out areas where prompt response is receiving low marks from our customers and needs improvement." Please provide the full set of scores referred to by this statement for the period just prior to the issuance of the Management Instruction (dated August 23, 1993). FY 1993 scores are satisfactory. Provide comparable scores for the periods FY1999, FY2000, FY2001, and FY 2002 (if available).
- c. State fully all measures implemented by the Postal Service to improve the scores referred to in the statement quoted in part b.
- d. State fully how the Postal Service monitors success/failure to improve responses to customer complaints, at the (1) local level, (2) district level, (3) regional level. In particular, explain fully how each of the types of individuals and departments listed under the "Scope" paragraph measures the success/failure of administrative levels below to improve responses to customer complaints:
  - (1) Headquarters Consumer Affairs
  - (2) Area office managers
  - (3) Customer Services district managers
  - (4) Plant managers
  - (5) Consumer Affairs and Claims managers
  - (6) Postmasters and station or branch managers
  - (7) Postal employees delegated responsibility for handling complaints

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

- a. In 1993, the term "Customer Satisfaction Index" referred to the survey of residential customers, which later became known as the CSM Residential survey. It is one of several surveys that form the basis of the Postal Service's Customer Satisfaction

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

Measurement (CSM). A copy of the current Residential survey is attached as Attachment A to response to OCA/USPS-7. For the type of data collected, please refer to Attachment A to OCA/USPS-7. Reports are not routinely made about this data. Instead the results are made available to postal managers. Currently, the CSM Residential survey is mailed to approximately 750,000 randomly selected households and about 200,000 completed surveys are received back each quarter.

b. The CSM Residential survey results for FY2002 are not yet available. By agreement between counsel for OCA and the Postal Service, this interrogatory has been limited to FY94, 99, 00, and 01 data. The CSM Residential results that this interrogatory seeks for FY94, 00 and 01 are the subject of the Postal Service's Motion for Protective Conditions for Results of Customer Satisfaction Surveys, filed November 13, 2001. The motion is the subject of an ongoing discovery dispute that is still being briefed by the parties. If protective conditions are established, the information can be provided. The Postal Service does not object to providing access to the data from FY99 as long as the data is provided under protective conditions. It will make the appropriate application to amend its motion for protective conditions to cover FY99 data as well.

c. The Postal Service has undertaken a wide range of measures to improve its responsiveness to customers, although none of these measures was undertaken to improve the scores on the CSM Residential survey, per se. Some of the measures include instituting the Consumer Affairs Tracking System (CATS); the call centers; and enhancing the Postal Service website, [www.usps.com](http://www.usps.com).

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

d. See Standard Operating Procedures Consumer Affairs Managers attached hereto. Consumer Affairs is the owner of the complaint handling process and only retains escalated customer issues. It is the obligation of the post offices or local policy administrators to respond to customer issues occurring within their areas of responsibility and within the required timeframes. The District Consumer Affairs office retains only customer issues that have not been resolved within two contacts by post office or local policy administrators. Consumer Affairs monitors the incidence of overdue cases and works to minimize the occurrence of overdue cases. The District Consumer Affairs office oversees compliance within the district. The Area Customer Service Program Analyst oversees compliance within the area. At Headquarters, the Office of Consumer Advocate sets policy and targets regarding compliance and monitors national compliance.



Attachment to Response to  
Interrogatory OCT/USPS-183 p.14

**Standard Operating Procedures  
Consumer Affairs Managers**

**PROCESS: Complaint Handling**

**Cycle Time:** The maximum number of days allowed to close the issue and respond to the customer, based on method of contact used by customer, is calculated from the date of receipt. Initial contact must be made within 24 hours after receipt of issue. Expeditious handling and resolution are required.

<u>Source</u>	<u>Cycle Time</u>
Internet	24 hours <sup>6</sup>
NSC Service Issue Record (SIR)	48 hours <sup>6</sup>
Congressional Inquiry	7 days*
Telephone Call	7 days*
Walk In	7 days*
CSM Survey	14 days*
Letter/Correspondence	14 days*
PS 4314-C, <i>Consumer Service Card</i>	14 days*

**Publication Watch:**

Daily -- document 10 editions	35 days*
Weekly -- document 4 editions	45 days*
Monthly -- document 2 editions	75 days*

**Procedures: Complaint Handling**

**Referrals:** Designate another office within the district to resolve a case.

1. Use the quickest method possible to send referrals to an office.
2. Use the telephone when referrals require 48-hour closure. Provide the receiving office with the necessary information to contact the customer and to resolve the customer issue.
3. The caseworker must update the case and provide resolution information (see below) before a case may be closed in CATS.

<sup>6</sup> Excludes non-working days  
\* Calendar Days

Attachment to Response to  
Interrogatory OCA/USPS 183p.25

Escalation: Elevate handling of a case to the next managerial level.

1. When the customer requests escalation, from the District Consumer Affairs office to Headquarters Consumer Affairs, call 202-268-2264 *only*. The customer must be introduced to the person answering the telephone.
2. Escalation of letter correspondence, from the District Consumer Affairs office to Headquarters Consumer Affairs, must be approved by first contacting the supervisor of the Consumer Communications Team at 202-268-2284.

Resolution: Closure of a case in CATS must accurately reflect the resolution. Required elements include:

1. Method of contact (i.e. Letter, Telephone)
2. Date contacted
3. Person who contacted customer
4. Specific action taken

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-184. Please refer to the "Management Instruction, PO-250-93-2" attached to the Postal Service's response to interrogatory OCA/USPS-83. In the paragraph labeled "Source of Complaints," the following methods of submitting complaints are listed: (1) Form 431 4-C, *Consumer Service Card (English)*; (2) Form 431 4-C, *Consumer Service Card (Spanish)*; (3) Telephone and personal contact; (4) Written correspondence, including customer surveys (e.g., the Customer Satisfaction Index); (5) Headquarters to field referrals; and (6) Governmental inquiries. Please list separately and describe fully all databases that collect and tabulate the complaint information listed for the six complaint methods.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

1-2. Complaints submitted on Consumer Service Cards are logged into the Consumer Affairs Tracking System (CATS). See USPS-LR-J-139 for how the information is tabulated.

3. Complaints submitted directly to local post offices by telephone, personal contact or written correspondence are not logged into a database unless the office transfers the information to a Consumer Service Card. Complaints received at 1-800-ASK-USPS are handled by the Postal Service's call centers and logged into the Service Issue Management System (SIMS). SIMS does not provide the detail available in CATS but does tabulate the data into categories of service issues. These call center complaints may also be entered into CATS if they are transferred to the District Consumer Affairs office.

4-6. Written complaints received by the Consumer Affairs office at any level, district, area, or headquarters, are entered into CATS.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-185. Please refer to the "Management Instruction, PO-250-93-2" attached to the Postal Service's response to interrogatory OCA/USPS-83. In the paragraph labeled "Responsibility," it is stated that "Consumer Affairs and Claims managers must also . . . Establish and maintain a customer complaint file." Is this "customer complaint file" separate from, and in addition to, the complaint files listed in interrogatory OCA/USPS-184 above? If so, then what is the name of the database that collects and maintains this customer complaint information? If not, then which of the files listed in Interrogatory OCA/USPS-184 is coextensive with the Consumer Affairs and Claims managers customer complaint files?

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to OCA/USPS-184. Since complaints received by Consumer Affairs are logged into the Consumer Affairs Tracking System (CATS), a separate file is typically not maintained.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-186. Please refer to the "Management Instruction, PO-250-93-2" attached to the Postal Service's response to interrogatory OCA/USPS-83. In the paragraph labeled "Responsibility," it is stated: "Postmasters and station or branch managers must also do the following . . . Maintain one or more customer complaint control logs."

- a. Is this "customer complaint control log" separate from, and in addition to, the complaint files listed in interrogatory OCA/USPS-184 above? If so, then what is the name of the database that collects and maintains this customer complaint information? If not, then which of the files listed in Interrogatory OCA/USPS-184 is coextensive with the Postmaster/Station Manager/Branch Manager customer complaint control logs?
- b. Are the Postmaster/Station Manager/Branch Manager customer complaint control logs centralized into district, regional, or national databases?
  - (i) If so, what are these databases called?
  - (ii) What reports are regularly generated from these databases?

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

Complaint logs would be maintained at the local level and are not centralized in a database.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-187. Please refer to the "Management Instruction, PO-250-93-2," pages 2-3, attached to the Postal Service's response to interrogatory OCA/USPS-83. Please confirm that information collected from a complaint made in person, in writing (by letter), and by telephone is transferred to a Consumer Service Card. If this is correct, then are all such methods of complaint consolidated into a single Consumer Service Card database? If not, then explain fully.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

Not confirmed. See the response to OCA/USPS-184. Local offices that receive complaints directly by methods other than the Consumer Service Cards (CSC) are not required to transfer the information to CSC, although some do.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-188. Please refer to the "Management Instruction, PO-250-93-2" attached to the Postal Service's response to interrogatory OCA/USPS-83. In the paragraph labeled "Measurement of Effectiveness," the following documents are listed: *Customer Satisfaction Index*, *Consumer Affairs field audits*, *Periodic reports on the Consumer Service Card program*.

- a. Please provide all results of the Customer Satisfaction Index for the period just prior to the issuance of the Management Instruction (on August 12, 1993). FY1993 information is satisfactory. Provide these same results for FY 1999, FY 2000, and FY2001.
- b. Provide a full list of Consumer Affairs field audits from 1993-2001. Include a brief description of each field audit, including the classes of mail and services addressed in each audit.
- c. Provide copies of the Periodic Reports from the Consumer Service Card program for the period just prior to issuance of the Management Instruction on August 12, 1993, (FY 1993 is satisfactory), and for FY1999, FY2000, and FY2001.
- d. Provide the following tabulations from the Consumer Service Card program:
  - (1) Total number of complaints of all types in FY1993, FY1999, FY2000, and FY2001.
  - (2) Subjects of the top 10 complaints (by number of complaints), for all types of complaints for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 10 subjects.
  - (3) Total number of complaints about First-Class Mail in FY1993, FY1999, FY2000, and FY2001.
  - (4) Subjects of the top 5 complaints (by number of complaints) for First-Class Mail for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 5 subjects.
  - (5) Number of complaints on length of time to deliver First-Class Mail for FY1993, FY 1999, FY2000, and FY2001.
  - (6) Number of complaints on failure to deliver First-Class Mail for FY1993, FY1999, FY2000, FY2001.
  - (7) Number of complaints on damaged First-Class Mail for FY1993, FY1999, FY2000, FY2001.
  - (8) Number of complaints on misdelivery of First-Class Mail for FY1993, FY1999, FY2000, FY2001.
  - (9) Number of complaints on price of First-Class Mail for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

The referenced Management Instruction has, in many ways, been superceded by the Standard Operating Procedures Consumer Affairs Managers, which is attached to the response to OCA/USPS-183.

- a. See response to OCA/USPS-183 (b).
- b. The field audits are optional and rarely done. Any field audits that exist would be retained at the districts, not at Headquarters.
- c-d. See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.



**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-189. Please refer to interrogatory OCA/USPS-188.d.(1) –(2) above.

- a. Describe all procedures and policies implemented by the Postal Service to rectify the complaints referenced in interrogatory OCA/USPS-188.d.(1) – (2). State the years that the procedures and policies were implemented.
- b. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- c. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part a. above. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.
- d. Please describe all procedures and policies implemented by the Postal Service to rectify the complaints about First-Class Mail referenced in OCA interrogatory 188.d.(3) – (8) above. State the years that the procedures and policies were implemented. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- e. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part d. of this interrogatory. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

a-e. The procedures and policies can be found in the referenced Management Instruction and in the Standard Operating Procedures Consumer Affairs Managers, which was implemented in January 2000. The current version of the SOP is attached to the response to OCA/USPS-183. There are no separate policies and procedures for how complaints about specific products or service should be rectified.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-190. Provide the following tabulations from the Consumer Service Card program:

- a. Total number of complaints about Priority Mail in FY1993, FY1999, FY2000, and FY2001.
- b. Subjects of the top 5 complaints (by number of complaints) for Priority Mail for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 5 subjects.
- c. Number of complaints on length of time to deliver Priority Mail for FY1993, FY1999, FY2000, and FY2001.
- c. Number of complaints on failure to deliver Priority Mail for FY1993, FY1999, FY2000, FY2001.
- d. Number of complaints on damaged Priority Mail for FY1993, FY1999, FY2000, FY2001.
- e. Number of complaints on misdelivery of Priority Mail for FY1993, FY1999, FY2000, FY2001.
- f. Number of complaints on price of Priority Mail for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-191. Please refer to interrogatory OCA/USPS-190.a. – e. above.

- a. Describe all procedures and policies implemented by the Postal Service to rectify the complaints about Priority Mail referenced in interrogatory OCA/USPS-190.a. – e. above.
- b. State the years that the procedures and policies were implemented. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- c. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part a. of this interrogatory. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to OCA/USPS-189.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-191A. Provide the following tabulations from the *Consumer Service Card* program:

- a. Total number of complaints about Express Mail in FY1993, FY1999, FY2000, and FY2001.
- b. Subjects of the top 5 complaints (by number of complaints) for Express Mail for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 5 subjects.
- c. Number of complaints on length of time to deliver Express Mail for FY1993, FY1999, FY2000, and FY2001.
- d. Number of complaints on failure to deliver Express Mail for FY1993, FY1999, FY2000, FY2001.
- e. Number of complaints on damaged Express Mail for FY1993, FY1999, FY2000, FY2001.
- f. Number of complaints on misdelivery of Express Mail for FY1993, FY1999, FY2000, FY2001.
- g. Number of complaints about the tracking system for Express Mail for FY 1993, FY1999, FY2000, and FY2001.
- h. Number of complaints on price of Express Mail for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-192. Please refer to interrogatory OCA/USPS-191Aa. – g. above.

- a. Please describe all procedures and policies implemented by the Postal Service to rectify the complaints about Express Mail referenced in interrogatory OCA/USPS-191A. a. - g.
- b. State the years that the procedures and policies were implemented. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- c. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part a. of this interrogatory. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to OCA/USPS-189.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-193. Provide the following tabulations from the Consumer Service Card program:

- a. Total number of complaints about Parcel Post in FY1993, FY1999, FY2000, and FY2001.
- b. Subjects of the top 5 complaints (by number of complaints) for Parcel Post for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 5 subjects.
- c. Number of complaints on length of time to deliver Parcel Post for FY1993, FY1999, FY2000, and FY2001.
- d. Number of complaints on failure to deliver Parcel Post for FY1993, FY1999, FY2000, FY2001.
- e. Number of complaints on damaged Parcel Post for FY1993, FY1999, FY2000, FY2001.
- f. Number of complaints on misdelivery of Parcel Post for FY1993, FY1999, FY2000, FY2001.
- g. Number of complaints on price of Parcel Post for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-194. Please refer to interrogatory OCA/USPS-193.a. -f. above.

- a. Please describe all procedures and policies implemented by the Postal Service to rectify the complaints about Parcel Post referenced in interrogatory OCA/USPS-193. a. - f.
- b. State the years that the procedures and policies were implemented. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- c. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part a. of this interrogatory. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to OCA/USPS-189.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-195. Provide the following tabulations from the Consumer Service Card program:

- a. Total number of complaints about Certified Mail in FY1993, FY1999, FY2000, and FY2001.
- b. Subjects of the top 10 complaints (by number of complaints) for Certified Mail for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 10 subjects.
- c. Number of complaints on price of Certified Mail for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.



RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-196. Please refer to interrogatory OCA/USPS-195.a. - b. above.

- a. Please describe all procedures and policies implemented by the Postal Service to rectify the complaints about Certified Mail referenced in interrogatory OCA/USPS-195. a. - b.
- b. State the years that the procedures and policies were implemented. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- c. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part a. of this interrogatory. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to OCA/USPS-189.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-197. Provide the following tabulations from the Consumer Service Card program:

- a. Total number of complaints about Return Receipt in FY1993, FY1999, FY2000, and FY2001.
- b. Subjects of the top 10 complaints (by number of complaints) for Return Receipt for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 10 subjects.
- c. Number of complaints on price of Return Receipt for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-198. Please refer to interrogatory OCA/USPS-197.a. - b. above.

- a. Please describe all procedures and policies implemented by the Postal Service to rectify the complaints about Return Receipt referenced in interrogatory OCA/USPS-197.a. - b.
- b. State the years that the procedures and policies were implemented. Provide copies of all documents distributed to managers and employees to inform them of such policies and procedures.
- c. Please describe all methods implemented by the Postal Service to measure the success or failure of the procedures and policies described in response to part a. of this interrogatory. Provide copies of all documents demonstrating any measures of success or failure of such policies and procedures.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to OCA/USPS-189.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-199. Provide the following tabulations from the Consumer Service Card program:

- a. Total number of complaints about Money Orders in FY1993, FY1999, FY2000, and FY2001.
- b. Subjects of the top 10 complaints (by number of complaints) for Money Orders for FY1993, FY1999, FY2000, and FY2001. Please give the number of complaints for each of the 10 subjects.
- c. Number of complaints on price of Return Receipt for FY1993, FY1999, FY2000, FY2001.

**RESPONSE:**

By answering this interrogatory, the Postal Service does not waive objections related to relevancy, burden, or other grounds and reserves the right to object in the future.

See response to DFC/USPS-3 and USPS-LR-J-139. The data from FY93 are not available.