

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

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

FURTHER REVISED RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO POIR NO. 4, QUESTION 6 (ERRATA)

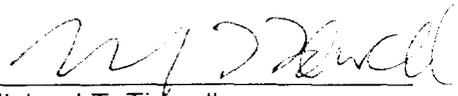
The United States Postal Service hereby files the further revised response of witness Robinson to Presiding Officer's Information Request No. 4, Question 6. This further revised response supersedes the revised response filed on December 13, 2001.

The changes on page 3 and 4 of the response filed today correct for the inadvertent incorporation of TYAR heavyweight piece volume estimates in place of nonmachinable piece volume estimates. The corrected numbers are indicated by shading on pages 3 and 4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

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February 15, 2002

FURTHER REVISED RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 4

**POIR 4, Question 6**

OCA/USPS-63-c requests Base Year and Test Year volume for letter shaped mail separated for manual processing. The response, filed on October 25, provides "Base Year volumes [that] 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 nonmachineable definition." Please provide, by subclass, the volume of letter shaped mail separated for manual processing that does not satisfy these definitions. For example, First-Class letters greater than one ounce would seem to fall into this category. Also, please confirm that the requested information when added to the information provided in response to OCA/USPS-63-c provides the total volumes manually processed.

**RESPONSE:**

The Postal Service cannot estimate the total volume of First-Class Mail, letter-shaped pieces weighing over one ounce that would be manually processed in the test-year-after-rates. The description below outlines the available data on volumes subject to the proposed nonmachinable surcharge by rate category, shape, and weight<sup>1</sup>.

Single-Piece Rate Category

For single-piece First-Class Mail weighing one ounce or less, the estimated volume in the test-year-after-rates that would pay the nonmachinable surcharge equals

- (i) the single-piece volume weighing one ounce or less that meets the current nonstandard definition

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<sup>1</sup> All data in thousands of pieces.

FURTHER REVISED RESPONSE OF  
 UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
 TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 4

**Response to POIR 4, Question 6 (page 2 of 5)**

<b><u>Single Piece Volume</u></b>	<b><u>Source:</u></b>
415,041 current nonstandard	(a)=[USPS-T-29, Att.C at 1 col2(e) /USPS-T-29, Att. C at 1 col 2(a)] *[USPS-T-29, Att. C at 1 col (3)(a)
55,536 letter-shaped	(b) = (a)*GFY00 letter share from USPS-LR-J-112
319,880 flat-shaped	(c) = (a)*GFY00 flat share from USPS-LR-J-112
39,625 parcel-shaped	(d) = (a)*GFY00 parcel share from USPS-LR-J-112
(ii) the single-piece volume weighing one ounce or less that would pay the proposed nonmachinable surcharge because of the expansion of the definition (527,592 pieces = 942,633 total nonmachinable USPS-T29, Att. C at 1, col. (3)(e) less 415,041 nonstandard pieces in (i) above). All of the pieces that will pay the nonmachinable surcharge because of the expanded definition are letter-shaped. See proposed DMCS §232(c). The process used to derive the estimated single-piece volume is shown at USPS-T-29, Attachment F at 3. The Postal Service has no estimates of the volume of single-piece mail for which manual processing requests are made.	

Therefore, the estimated total volume of single-piece First-Class Mail to which the proposed nonmachinable surcharge would apply is 942,633 (= 583,128 letter-shaped + 319,880 flat-shaped + 39,625 parcel-shaped). All of these pieces, by definition, weigh one ounce or less.

Because there is no rate element comparable to the current nonstandard surcharge for single-piece, First-Class Mail weighing more than one ounce, the Postal Service does not have data that allows it to count the pieces with physical characteristics similar to those of pieces weighing one ounce or less that are

FURTHER REVISED RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 4

**Response to POIR 4, Question 6 (page 3 of 5)**

subject to the nonstandard surcharge. The Postal Service also does not have data on the volume of First-Class Mail for which manual processing is requested. **Nonautomation Presort Rate Category**

For Nonautomation Presort First-Class Mail weighing one ounce or less, the estimated volume in the test-year-after-rates that would pay the nonmachinable surcharge equals

- (i) the nonautomation presort volume weighing one ounce or less that meets the current nonstandard definition

**Nonautomation Presort**

**Source:**

37,900 current nonstandard	(a) =[USPS-T-29, Att.C at 1 col2(j) /USPS-T-29, Att. C at 1 col 2(f)] *[USPS-T-29, Att. C at 1 col (3)(f)]
12,745 letter-shaped	(b) = (a)*GFY00 letter share from USPS-LR-J-112
19,951 flat-shaped	(c) = (a)*GFY00 flat share from USPS-LR-J-112
5,203 parcel-shaped	(d) = (a)*GFY00 parcel share from USPS-LR-J-112

- (ii) the Nonautomation Presort volume weighing one ounce or less that would pay the proposed nonmachinable surcharge because of the expansion of the definition (**837,240** pieces = **875,140** total nonmachinable USPS-T29 Att C at 1 col. (3)(j) less 39,700 nonstandard pieces in (i) above). All of the pieces that will pay the nonmachinable surcharge because of the expanded definition are letter-shaped. See proposed DMCS §232(c). The Postal Service has no estimate of the number of Nonautomation Presort pieces for which manual processing is requested. However, the mail characteristics data used to estimate the number of pieces of that are

FURTHER REVISED RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 4

**Response to POIR 4, Question 6 (page 4 of 5)**

physically nonmachinable may be slightly overstated and therefore can be assumed to account, in part, for manual processing requests.<sup>2</sup>

Therefore, the estimated total volume of Nonautomation Presort, First-Class Mail to which the proposed nonmachinable surcharge would apply is **875,140** (= **849,986** letter-shaped + 19,951 flat-shaped + 5,203 parcel-shaped). All of these pieces, by definition, weigh one ounce or less.

Because there is no rate element comparable to the current nonstandard surcharge for Nonautomation Presort, First-Class Mail weighing more than one ounce, the Postal Service does not have data that allows it to count the pieces with physical characteristics similar to those of pieces weighing one ounce or less that are subject to the nonstandard surcharge. The Postal Service also does not have data on the volume of First-Class Mail for which manual processing is requested.

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<sup>2</sup> The estimated 24.45 percent of Nonautomation Presort volume that is assumed to pay the proposed nonmachinable surcharge is based on the 1997 Mail Characteristic Study (Docket No. R97-1, USPS-LR-H-185; also reported in USPS-LR-J-60 at 50, see response to OCA/USPS-86(a)). This percentage is the share of all letter-shaped pieces, regardless of weight, that are physically nonmachinable. Therefore, it is possible that some proportion of the 24.45 nonmachinable percent of all letter-shaped pieces includes pieces weighing over one ounce. However, this percentage is likely to be very small. Of all letter-shaped Nonautomation Presort pieces, 95.6 percent weigh less than one ounce and, of the pieces weighing more than one ounce, many may be machinable.

Revised: 2/15/2002

FURTHER REVISED RESPONSE OF  
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TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 4

**Response to POIR 4, Question 6 (page 5 of 5)**

Automation Letters

By definition, all First-Class Mail Automation Letters are machinable.

Carrier Route Letters

By definition, all First-Class Mail Carrier Route Letters are machinable.

**DECLARATION**

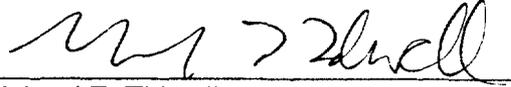
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

*Maura Robinson*  
MAURA ROBINSON

Dated: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in Docket No. R2001-1.

A handwritten signature in black ink, appearing to read "M T Tidwell", written over a horizontal line.

Michael T. Tidwell

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February 15, 2001