

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

**EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.**

Docket No. MC2002-2

**AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JAMES D. WILSON
(APWU/USPS-T4-13-17)
(November 14, 2002)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the American Postal Workers Union, AFL-CIO ("APWU") hereby submits interrogatories and requests for production of documents to Witness James D. Wilson.

Respectfully submitted,

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CERTIFICATION

I hereby certify that I have this date served the following document in accordance with the rules of practice.

Susan L. Catler
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1300 L Street NW Suite 1200
Washington, DC 20005-4126

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APWU/USPS-T4-13. In your responses to APWU/USPS-T4-1 and APWU/USPS-T4-3, you state that PARS will reduce the Postal Service's costs of handling UAA mail.

- (a) Please describe which manual functions for the handling and processing of UAA mail will be automated by PARS or as a result of PARS implementation.
- (b) Please describe in detail how PARS will change the handling of mail pieces that will be sent back to the sender. In addition
 - (1) Will PARS automate the handling of pieces that will be returned to sender?
 - (2) Will PARS prevent a piece of mail that will ultimately be returned to sender from ever reaching the delivery unit of the address on the mail piece?
 - (3) Will PARS redirect a piece back to its sender without it going through a CFS unit?
- (c) Please describe in detail how PARS will change the handling of mail pieces that will be forwarded. In addition
 - (1) Will PARS automate the handling of pieces that will be forwarded?
 - (2) Will PARS prevent a piece of mail that will be forwarded from ever reaching the delivery unit of the address on the mail piece?
 - (3) Will PARS redirect a forwardable letter without it going through a CFS unit?
- (d) Please provide the complete implementation schedule for PARS as currently envisioned.
- (e) Please indicate when and where in the network PARS will be implemented.
- (f) Please indicate the approximate volume of mail that will be processed through PARS during each year of the proposed Negotiated Service Agreement.

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APWU/USPS-T4-13. (continued)

- (g) Has the Postal Service produced any estimates of savings expected from the use of PARS in the handling of UAA mail, such as in its Decision Analysis Report for PARS? If so please provide any estimates of such savings for each year for which such estimates are available and show all calculations for deriving those savings estimates. If separate savings estimates have been made for forwarded mail and for return to sender mail please show those separately.
- (h) Will PARS result in any changes in how mail is handled by the CFS units? If so please describe.
- (i) Will PARS change how much mail is handled by the CFS units? If so please quantify the change in the amount of mail that is handled by the CFS units for each year covered by the proposed Negotiated Service Agreement.
- (j) Will PARS have any impact on the generation of electronic Address Correction Service (ACS) notifications? If so, please describe and quantify the impact on the generation of ACS notifications for each year covered by the proposed Negotiated Service Agreement.

APWU/USPS-T4-14. Do you anticipate that there will be a change in the institutional cost coverage of the address correction service as a result of the implementation of CSR-Option 2? If so, please explain your response and detail any anticipated change.

APWU/USPS-T4-15. Has the Postal Service done any estimates of the increased volume and/or increased costs of forwarding First Class mail due to a change to CSR-Option 2? If so, please provide those estimates and all calculations used to generate them and please indicate where these additional costs will appear in the Postal Services' accounting system.

APWU/USPS-T4-16. In your response to APWU/USPS-T4-9 (b) you state that 4-5 percent of mail is handled through local forwarding.

- (a) Please confirm that this is 4-5 percent of forwarded mail volume.
- (b) Is First Class mail with the current CSR endorsement forwarded locally now?
- (c) Will First Class mail bearing a CSR Option 2 endorsement be forwarded locally without generating an ACS notification?

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APWU/USPS-T4-17. Please clarify your response to APWU/USPS-T4-10.

- (a) Is the 1.23 percent figure in your answer to APWU/USPS-T4-10 an average presort letter return percentage? If not please identify what mail is included in that percentage.
- (b) Please identify the sources of the 1.23 percent figure in your answer to APWU/USPS-T4-10.
 - (1) Please confirm that the 1.23 percent figure in your answer to APWU/USPS-T4-10 includes the mail returned to sender from the CFS units (the count of which you provided in your response to OCA/USPS-T4-6), and return to sender mail worked directly by the mail processing facilities (approximately two-thirds of the total return to sender volume).
 - (2) In addition to those two sources, does the 1.23 percent figure also include mail returned to sender by the carrier as a result of a death?
 - (3) Are there any other sources or types of mail included in the 1.23 percent figure?