

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS WILSON
(OCA/USPS-T4-22, 23)

The United States Postal Service hereby provides the responses of witness
Crum to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-
T4-22 and 23, filed on November 5, 2002 and redirected from witness Wilson.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089 Fax -5402
November 15, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS WILSON

OCA/USPS-T4-22. Please refer to your testimony at page 5, lines 1- 9.

- (a) What is the cost of loading ASR- and CSR-endorsed mail into a mechanized terminal desk? Provide the source for this answer.
- (b) What is the cost of manually keying information into the terminal so as to retrieve the recipient's new address? Provide the source for this answer.
- (c) What is the cost of inputting the reason for non-delivery (as noted by the carrier on the cover of the mailpiece) into the terminal? Provide the source for this answer.
- (d) What is the cost of inputting the ACS participant code and the keyline from the mailpiece into the terminal? Provide the source for this answer.

RESPONSE:

(a) – (d) The available information about the cost per piece for processing at CFS units is described in Table 5.2.2 of USPS/LR-J-69. That table does not break out the costs in the precise manner requested.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS WILSON

OCA/USPS-T4-23. Please refer to your testimony at page 5, lines 10 – 12.

- (a) What is the cost to the CFS center to process mail with a valid forwarding order on file? Provide the source for this answer.
- (b) What is the cost to process mail without a valid forwarding order? Provide the source for this answer.
- (c) What is the cost to discard mail that is endorsed CSR, Option 2? Provide the source for this answer.

RESPONSE:

- (a) The estimate of CFS processing costs for UAA mail being forwarded of \$.1258 is presented in Table 5.1.1 of USPS/LR-J-69.
- (b) Although the question is unclear, I have interpreted it to be “what is the cost of to process and discard mail with a CSR, Option 2 endorsement.” Based on Table 5.1.3 of USPS/LR-J-69, the cost of CFS processing for UAA mail treated as waste is \$0.0138. CSR, Option 2 will become a valid endorsement in January 2003. I have no reason to believe that the cost to process waste will differ on CSR, Option 2.
- (c) Please also refer to my response to (b) above.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 15, 2002