

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
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO,
REDIRECTED FROM WITNESS PLUNKETT
(APWU/USPS-T2-11)

The United States Postal Service hereby provides its response to the following
interrogatory of American Postal Workers Union, AFL-CIO: APWU/USPS-T2-11, filed on
October 31, 2002.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 18, 2002

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APWU/USPS-T2-11. On page 12 of your testimony, you discuss data collection issues.

- (a) Will the data collection system for this proposed Negotiated Service Agreement be able to identify how many pieces and what proportion of Capital One's First Class mail are forwarded?
- (b) Will the data collection system for this proposed Negotiated Service Agreement be able to identify how many pieces and what proportion of Capital One's First Class mail are destroyed?
- (c) Will the data collection system for this proposed Negotiated Service Agreement be able to identify how many pieces and what proportion of Capital One's First Class mail are returned as undeliverable as addressed?
- (d) If the data collection system is able to identify the number and/or proportion of pieces forwarded, destroyed or returned of Capital One's First Class mail, how will that information be reported and maintained?
- (e) If the data collection system is not able to identify the number and/or proportion of pieces forwarded, destroyed or returned of Capital One's First Class mail, will any other methods be developed or used to obtain this information?
- (f) Will data be collected for other First Class mailers during the period of the proposed Negotiated Services Agreement, showing the number of pieces and or the proportion of pieces forwarded, destroyed or returned as undeliverable as addressed?
- (g) If data is collected for other First Class mailers during the period of the proposed Negotiated Services Agreement, showing the number of pieces and or the proportion of pieces forwarded, destroyed or returned as undeliverable as addressed, how will this information be reported and maintained?

RESPONSE:

Some data sources have been identified and can readily be tapped. However, other procedures have yet to be defined, so that to the extent the term "data collection system" implies the existence of a complete set of established collection procedures, it is a poor descriptor. For example, data on forwarded, destroyed, or returned pieces that flow through CFS units will be comparatively simple to assemble. For those pieces physically returned to Capital One,

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procedures yet need to be worked out between the Postal Service and Capital One. This caveat must be kept in mind for the following responses.

- a. Yes. The PERMIT system will allow the collection of Capital One volume, per article III(J) of the Agreement. ACS data will be able to provide the number of most forwarded Capital One pieces. However, this would not include pieces forwarded locally or those forwarded from a destination delivery unit covered by a CFS unit; there is no practical means of counting such pieces.
- b. Yes. The PERMIT system will allow the collection of Capital One volume, per article III(J) of the Agreement. ACS data will be able to provide the number of destroyed Capital One pieces.
- c. Yes. The PERMIT system will allow the collection of Capital One volume, per article III(J) of the Agreement. Capital One and the Postal Service will work out prior to implementation how to ensure an accurate report of the number of pieces of mail that are returned to Capital One.
- d-e. In part because the Commission has yet to issue any recommended decision on the pending NSA Request, these details have not been determined.
- f-g. No; this NSA is about Capital One, not other mailers so there is no basis for reporting the behavior of other mailers. That does not mean, however, that the implementation of Change Service Requested, Option 2, will preclude all comparisons of Capital One with system wide measures.

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.

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