

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement )  
Capital One NSA )

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE  
FOLLOW-UP INTERROGATORIES TO THE UNITED STATES  
POSTAL SERVICE RE ITS RESPONSE TO ORAL REQUEST OF  
CHAIRMAN OMAS AT TR. 2/342  
(OCA/USPS-11 AND -12)  
(December 10, 2002)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits follow-up interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-11. Please refer to the Attachment to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002. Please provide citations to source documents for each of the following sixteen figures set forth in the Attachment:

- a. For Forwarded Mail, citations to source documents for the "Cost" figures for Carrier Preparation, Clerk Handling, CFS Processing, and Mailstream Processing.
- b. For Forwarded Mail, citations to source documents for the "%" figures for Carrier Preparation, Clerk Handling, CFS Processing, and Mailstream Processing.
- c. For Returned Mail, citations to source documents for the "Cost" figures for Carrier Preparation, Clerk Handling, CFS Processing, and Mailstream Processing.
- d. For Returned Mail, citations to source documents for the "%" figures for Carrier Preparation, Clerk Handling, CFS Processing, and Mailstream Processing.
- e. If source documents are not the basis for any of the sixteen figures described in parts a. – d. of the instant interrogatory, then state how the specific figure(s) were determined. If calculations underlie any of the sixteen figures provided, then furnish the calculations.
- f. Please state which (if any) of the sixteen figures are based upon IOCS question 23D data.

OCA/USPS-12. Please refer to the Attachment to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002, at 4. The response identifies the following difficulty in processing return-to-sender mail via automation:

when the POSTNET barcode for the original delivery address is contained in the address block, the Postal Service cannot use the LMLM to cover the POSTNET. In that case the Postal Service may use a grease pencil to manually block out the original POSTNET. This not particularly effective

since part of the delivery address may be blocked, the original POSTNET code may still be visible or there may still be a duplicate POSTNET imprinted on the piece that needs to be run on the LMLM.

Please answer the following questions with respect to forwarded mail.

- a. Doesn't the same difficulty arise when a CFS clerk must cope with a POSTNET barcode in the address block? Please explain in full.
- b. Wouldn't it also be difficult for a CFS clerk to use the yellow forwarding label to cover the POSTNET? Please explain in full.
- c. Might it not also be necessary for a CFS clerk to use a grease pencil to manually block out the original POSTNET? Please explain in full.
- d. Might not the grease pencil mark also block out part of the delivery address? Please explain in full.
- e. Might not the original POSTNET code still be visible? Please explain in full.
- f. Might not there be a duplicate POSTNET imprinted on the piece that needs to be forwarded? Please explain in full.
- g. Might not the piece have a fluorescent ID tag on the back, with the original delivery address stored in the Postal Service's data systems? Please explain in full.
- h. Might not the processing equipment be unable to detect a barcode on the front of the piece and therefore process the piece according to the ID tag, thereby sending the piece back to the original delivery address? Please explain in full.

- i. If any of the following difficulties listed in a. – h. occur for forwarded mail, then wouldn't such forwarded pieces "be frequently handled manually" and wouldn't the processing costs be "very high?" Please explain in full.
- j. Please compare the frequency of a. – i. occurring for forwarding mail versus the frequency of a. – i. occurring for returned mail. If the frequency of one is stated to be higher than the frequency of the other, cite to documents that support the statement. If no documents are available, then explain the basis for expecting the frequencies of one to be higher than the frequency of the other.