

**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)  
FOLLOW-UP INTERROGATORIES TO THE UNITED STATES  
POSTAL SERVICE RE ITS RESPONSE TO ORAL REQUEST OF  
CHAIRMAN OMAS AT TR. 2/342  
(APWU/USPS-3 through 7)  
(December 12, 2002)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the American Postal Worker's Union, AFL-CIO hereby submits follow-up interrogatories and requests for production of documents.

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.

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December 12, 2002

APWU/USPS-3. In reference to the USPS response to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002, please refer to the comment on page 3 that states: "Mail carrying yellow forwarding labels can often be processed on the Postal Service's sortation equipment as the labels can contain POSTNET barcodes and machine-readable text."

- a) Please provide an estimate of what percentage of yellow forwarding tags in 2000 and currently contain POSTNET barcodes and machine-readable text.
- b) Are the percentages provided in response to part a) the percent of forwarded mail that the Postal Service would expect to be handled by automated equipment?
- c) Do you expect these percentages to change with the implementation of Phase I of PARS? If so by how much? Please explain your answer.

APWU/USPS-4. In reference to the USPS response to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002, please refer to the following statement on page 4:

"Based on the available information, it is the Postal Service's best estimate that in FY2002 slightly less than half of return to sender pieces received a verified POSTNET barcode and were possibly processed on automation."

Would this also be the percentage of returned mail that received a verified POSTNET barcode in FY2000, the year that this response indicates is the basis for the cost estimates?

APWU/USPS-5. In reference to the USPS response to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002, please refer to the following statement on page 4:

"Thus returns are frequently handled manually throughout the system and, if so, the processing costs are very high."

- a) Please confirm that if the piece does not receive a verified POSTNET barcode in the return to sender processing, then it will be handled "manually throughout the system."
- b) Please describe what is involved in handling returns "manually throughout the system."
- c) Will any mail that receives a verified POSTNET barcode during the return to sender process be handled "manually throughout the system"? If so why?

APWU/USPS-6. In reference to the USPS response to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002, please refer to and clarify the descriptions on page 5:

- a) What is considered to be the "standard processing" for returned mail? Is "standard processing" the steps listed by witness Wilson in his response to OCA/USPS-T4-20 or is it something else? The "special procedures" listed seem to be what witness Wilson describes.
- b) If "standard processing" is not as witness Wilson described in OCA/USPS-T4-20, please describe the steps in standard processing.
- c) Does the Postal Service specify to its managers the expected handling procedures for returned mail or does each manager determine that for his or her plant?
- d) Are there any circumstances under which pieces of returned mail going to one address would be consolidated and returned in one package as opposed to each piece being handled separately?

APWU/USPS-7. In reference to the USPS response to Oral Request of Chairman Omas at Tr. 2/342, filed December 9, 2002:

- a) Please describe, in detail, which procedures for returned mail are expected to change with the implementation of PARS, Phase I.
- b) Please estimate for the three years of this proposed Negotiated Service Agreement, the percentage of returned mail that will be handled with automation equipment versus handled manually throughout the system, given the implementation of PARS Phase I.