

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF MAGAZINE PUBLISHERS OF AMERICA REDIRECTED FROM
WITNESS BARON
(MPA/USPS-T17-9 AND 10)

The United States Postal Service hereby provides responses to the following interrogatories Magazine Publishers of America: OCA/USPS-T17-9 (revised response) and 10, filed on August 21, 1997 and redirected from witness Baron. On September 5, 1997, the Postal Service had moved for an extension of time until Friday, September 12, 1997 to furnish additional information for interrogatory 9, which had been partially answered, and to respond to interrogatory 10. The Postal Service was able to obtain the information and complete its responses earlier than expected. For ease of reference, a completely revised response is being filed for interrogatory 9.

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


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September 10, 1997

Response of the United States Postal Service
to
Interrogatory of MPA
(Redirected from Witness Baron, USPS-T-17)

MPA/USPS-T17-9 Please disaggregate the number of routes and rural carrier cost by type (e.g., H, J, K, auxiliary, mileage).

Response:

The number of routes and the rural carrier salary costs as of the end of fiscal year 1996 are listed in the following table.

Route Type	Number of Routes	Salary Costs (000)
H	5,297	1,894,539
J	4,868	189,973
K	38,484	192,102
Mileage	90	3,719
Auxiliary	8,915	163,574
Unknown		65,626
TOTAL	57,654	2,509,533

The rural carrier salary costs include salaries, holidays, and leave. Benefit costs are not available by route type and are not included. Salary costs in the 'Unknown' category are for training and auxiliary assistance and could not be matched to route type.

Response of the United States Postal Service
to
Interrogatory of MPA
(Redirected from Witness Baron, USPS-T17)

MPA/USPS-T17-10. Please provide documentation on how the Postal Service calculated the salary of an individual rural carrier for FY 1996. Include in this documentation a formula that derives annual rural carrier salary for an individual route from the route evaluation item workload and evaluation factors on that route. Also, please confirm that the data used to calculate FY 1996 workload for evaluated routes was from the "route evaluations...done over a four week period in the fall of 1995." [LR-H-192, Page 3]

Response to MPA/USPS-T17-10

The Postal Service based FY 1996 rural carrier salaries on route evaluations conducted in the fall of 1995. The evaluation process begins with a four week mail count conducted in accordance with Chapter 5 of Handbook PO-603, *Rural Delivery Carrier Duties and Responsibilities* (see Attachment 1 of the response to MPA/USPS-T17-12a). For each of the twenty four days in the count each evaluation workload item is recorded on a PS Form 4239, *Rural Route Count of Mail* (see Attachment 1 to this response). At the end of the second and fourth weeks of the count, the information from each of the daily PS Forms 4239 is transferred to a PS Form 4241, *Rural Delivery Statistics Report* (see Attachment 1, page 7 of the response to MPA/USPS-T17-12a). Upon the completion of the four week count, the information contained on the two PS Forms 4241 is recorded on PS Form 4241-X, *Rural Delivery Statistics Summary Report* (see Attachment 2 to this response). The data from the PS Form 4241-X is electronically submitted to the Minneapolis Information Service Center where it is used to generate PS Form 4241-A, *Rural Route Evaluation* (see Attachment 3

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to this response). PS Form 4241-A is the worksheet that calculates the route time and salary for an individual route. To determine route time, counts for each evaluation workload item are applied to its respective evaluation factor and then summed. Salaries for individual routes are then determined by applying the route time to the appropriate step on the Rural Carrier Evaluated Schedule (see Attachment 4 to this response).



Rural Route Count of Mail

A. Letter Size				B. Sector/Segment Letters		C. Newspapers, Magazines, Flats, Catalogs, and Rolls		D. Parcels		E. Boxholders		F. Reg. Cert. Spec. Del. No. Insured, Ret. Rec. for March, & Exp. Mail		G. CODs, Customs Due Rcvd. for Deliv.							
																Total					
								H. Postage Due		I. C.O.A. (Form 3575)		J. Marked-Up		K. Form 3821 Completed							
Total																					
L. OPS Letters		M. Money Order Applications		N. Letters & Flats Collected		O. Ordinary & Insured Parcels/ CODs Accepted		P. Registered & Certified Accepted		Q. Lead Vehicle (If more than 16 min. explain in Comments)		R. Other Suitable Allowance (Explain in Comments)		S. Stamp Stock "L" Routes Only		T. Return Receipt "L" Routes Only		U. Authorized Discounts (Expl. in Comments)			
Total																					
Comments										V. Discount Dist. (Pt.) (Expl. in Comments)		W. Counting Time		X. Waiting Time		Y. Intermediate Offices Served Daily		Z. Weight of Locked Pouches Carried Daily			
I certify that the above is correct.										Day		Date		Carrier or Supervisor's Signature							



Rural Delivery Statistics Summary Report

(Follow Instructions in Chapter 5 of Handbook PO-603)

Post Office, State, and ZIP + 4

District _____ District ZIP Code _____ Carrier's Name _____

Date of Count From - Through	Finance Number	Route Number	Route Miles (Hundreds)	Regular Boxes	Centralized Boxes	NDCBU Coll. Camps	Parcel Lockers	Vehicle Stops

Date	Letter Size (A)	Sector/Segment Letters (B)	Papers, Magazines and Catalogs (C)	Parcels (D)	Box Holders (E)	Reg. Cert. Ins. Spec. Exp. (F)	COD Customs Due Del. (G)	Postage Due (H)	Change of Address (I)	Mark-Ups (J)	Form 3821 (K)
Weeks 1 & 2											
Weeks 3 & 4											
Total											

Date	DPS Letters (L)	M.O. Applications (M)	Letter Size and First Class Coll. (N)	Ord. Ins. PP Accepted (O)	Reg. & Cert. Accepted (P)	Loading in Actual Minutes (Q)	Other Suitable Allowance (R) *	Put Stamp Stock (S)	Return Receipts (T)	Auth. Daily Dismounts (Total) (U)	Total Distance of Auth. Daily Dismount Del. (Feet) (V)	Loaded Pouch Weight (Z)
Weeks 1 & 2												
Weeks 3 & 4												
Total												

(A) National Amended

(B) Families Served _____

(C) Number of Loaded Pouch Stops _____

(D) Mail Withdrawal Yes No

(E) Time Used During Count (Hrs & Hund.) (Subtract Lunch Time from Office and/or Route Time as Reported on Form 4240)

Office Time			
Route Time			
Net Total Time			
Auxiliary Assistance Used	Office		
	Route		
Waiting and Counting Time			

(F) Current Detour Yes No

Detour Miles (Hundreds) _____

Seasonal Route? Yes No

In Season? Yes No

(G) Seasonal Miles (Hundreds) _____

Regular Boxes _____

Central Boxes _____

(H) EMA OEMA Government Vehicle

(I) If 30-00 Plus, Convert to Regular Yes No

(J) High Option Yes No

(K) Leave Commitment Yes No

(L) Routing Relief Day Yes No

* All Entries in Column "R" Must Be Explained on Reverse.

In the event that I am eligible to elect a higher route classification, I agree to use sufficient annual leave during the guarantee period to assure that my total actual work hours will not exceed 2,080 during the guarantee period.

Carrier's Signature _____

Date of Local Conference _____

Certified to be Correct

Carrier's Signature _____

Postmaster's Signature _____

Date Signed _____

PS FORM 4241-A WORKSHEET (FACSIMILE)

OFFICE: _____ ROUTE: _____ EFF: _____
 LENGTH IN WEEKS: _____ BOXES/MILE: _____ HIGH DEN: _____

ITEM	REF	DATA DESCRIPTION	OFFICE TIME ALLOW	ROUTE TIME ALLOW	OFFICE TIME	ROUTE TIME
1		ROUTE LENGTH MILES		# x 12.0		
2		NON-REGULAR BOXES		# x 2.0		
3		L RTE REGULAR BOXES		# x 2.0 x 0.82		
4		CENTRALIZED BOXES		# x 1.0		
6		NDCBU BOXES		# x 1.0		
8		PARCEL LOCKERS		# x 2.0		
7		LETTER SIZE	(# / L) x 0.0825			
8		SECTOR SEGMENT LTRS	(# / L) x 0.0444			
9	C	PAPERS, MAGS, CATS	(# / L) x 0.125			
10	D	PARCELS	(# / L) x 0.333	(# / L) x 0.167		
11	E	BOX HOLDERS	(# / L) x 0.04			
12	F	REG CERT INS SPEC EX	(# / L) x 1.0	(# / L) x 3.0		
13	G	COD CUSTOMS DUE DEL	(# / L) x 1.5	(# / L) x 4.0		
14	H	POSTAGE DUE	(# / L) / 5 ROUND TO NEXT MIN.			
15	I	CHANGE OF ADDRESS	(# / L) x 2.0			
16	J	MARK-UP	(# / L) x 0.25			
17	K	FORMS 3821	(# / L) x 2.0			
18	L	DPS LETTERS		(# / L) x 0.0333		
19	M	M.O APPLICATIONS	(# / L) x 1.5	(# / L) x 2.0		
20	N	LETTER SIZE & FLATS COLLECTED	(# / L) x 0.04			
21	O	ORD INS PF ACCEPTED	(# / L) x 2.0	(# / L) x 2.0		
22	P	REG & CERT COLLECTED		(# / L) x 2.0		
23	Q	LOADING IN ACT MINUTES	(# / L)			
24	R	OTHER SUITABLE ALLOW	(# / L)			
25	S	ADD'L TIME FOR USPS VEHICLE ROUTE	((RT.MI x 6) / 100) x 4.5 = TOT IF < 6, 30 MIN IF >= 6, TOT = 24			
26	S	L RTE PURC STAMP STOCK	(# / L) x 5.0			
27	S	NON-L STAMP HANDLING	30 MIN. (15 TRI WEEK)			
28		STRAPPING OUT TIME	((A + B + C - J) / L) x 0.0168			
29	T	L RTE RETURN RECEIPT	(# / L) x 0.25			
30		PERSONAL TIME	30 MIN. (15 TRI WEEK)			
31	U	AUTH DAILY DISMOUNTS		(# / L) x 0.1		
32	V	DISMOUNT DISTANCE		(# / L) x 0.00284		
33	2C	LOCK POUCH STOPS		# x 30 (ELSE MONETARY)		
34	2D	MAIL WITHDRAWAL	30 (YES); 0 (NO)			
		WEEKLY TOTALS				
		TIME IN STD. MIN				

TOTAL ROUTE TIME: HOURS _____ MIN _____ (* => BACK OFF FROM BOX FACTOR TIME!)

STOPS: _____ DAILY EM RATE _____ HIGH OPTION: _____ ROUTE EVAL: _____ SALARY: _____
 NO/LOW OPTION _____ ROUTE EVAL: _____ SALARY: _____

ASSIGNED CARRIER _____ MILEAGE _____ ROUTE EVAL: _____ SALARY: _____

STEP _____ VOLUME FACTOR - TIME = OFFICE + ROUTE . _____ TOTAL BOXES _____ VOL FACTOR _____

**Rural Carrier Evaluated Schedule
Full-Time Annual Basic Rates
Effective March 16, 1996 (PP 7-96)**

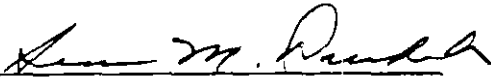
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Hours	A	B	C	1	2	3	4	5	6	7	8	9	10	11	12
12	7,240	8,052	8,674	9,305	9,397	9,487	9,578	9,668	9,762	9,853	9,942	10,035	10,125	10,217	10,307
13	7,841	8,726	9,398	10,081	10,180	10,277	10,375	10,473	10,571	10,671	10,771	10,868	10,966	11,063	11,161
14	8,445	9,396	10,122	10,855	10,962	11,069	11,174	11,279	11,389	11,495	11,600	11,706	11,813	11,917	12,027
15	9,049	10,066	10,846	11,633	11,746	11,861	11,974	12,088	12,201	12,316	12,427	12,539	12,656	12,768	12,882
16	9,651	10,738	11,668	12,405	12,520	12,652	12,771	12,894	13,014	13,135	13,258	13,379	13,500	13,621	13,741
17	10,255	11,410	12,290	13,185	13,309	13,440	13,569	13,697	13,827	13,958	14,083	14,210	14,342	14,472	14,598
18	10,858	12,080	13,013	13,957	14,094	14,232	14,368	14,506	14,641	14,778	14,915	15,053	15,190	15,326	15,461
19	11,462	12,751	13,735	14,733	14,878	15,021	15,165	15,308	15,452	15,599	15,742	15,884	16,029	16,172	16,314
20	12,066	13,422	14,460	15,512	15,663	15,814	15,964	16,119	16,271	16,421	16,575	16,727	16,877	17,028	17,183
21	12,665	14,094	15,183	16,285	16,442	16,603	16,761	16,921	17,079	17,239	17,398	17,555	17,717	17,875	18,034
22	13,270	14,765	15,906	17,062	17,226	17,394	17,557	17,723	17,891	18,058	18,223	18,386	18,554	18,720	18,887
23	13,873	15,435	16,628	17,833	18,011	18,184	18,357	18,532	18,704	18,882	19,057	19,229	19,404	19,575	19,750
24	14,477	16,102	17,347	18,611	18,790	18,970	19,152	19,333	19,515	19,697	19,878	20,058	20,242	20,422	20,605
25	15,079	16,779	18,073	19,385	19,576	19,765	19,955	20,142	20,322	20,503	20,713	20,901	21,092	21,280	21,469
26	15,683	17,449	18,796	20,164	20,358	20,556	20,751	20,950	21,143	21,341	21,538	21,733	21,931	22,126	22,321
27	16,287	18,119	19,519	20,937	21,140	21,348	21,551	21,758	21,960	22,167	22,369	22,571	22,780	22,983	23,187
28	16,889	18,788	20,241	21,711	21,921	22,135	22,345	22,559	22,767	22,980	23,194	23,404	23,618	23,826	24,039
29	17,493	19,463	20,963	22,485	22,706	22,928	23,145	23,365	23,582	23,807	24,027	24,243	24,465	24,681	24,901
30	18,096	20,135	21,691	23,268	23,491	23,721	23,945	24,171	24,399	24,626	24,852	25,079	25,307	25,535	25,760
31	18,699	20,803	22,412	24,038	24,275	24,509	24,744	24,976	25,213	25,450	25,686	25,921	26,157	26,392	26,623
32	19,302	21,472	23,132	24,815	25,056	25,298	25,538	25,781	26,022	26,266	26,508	26,747	26,991	27,234	27,474
33	19,905	22,145	23,857	25,586	25,837	26,089	26,338	26,590	26,839	27,090	27,341	27,587	27,841	28,090	28,340
34	20,510	22,816	24,580	26,384	26,622	26,879	27,134	27,392	27,650	27,908	28,185	28,419	28,680	28,934	29,194
35	21,111	23,487	25,304	27,138	27,407	27,672	27,937	28,201	28,466	28,734	29,000	29,262	29,531	29,793	30,056
36	21,715	24,158	26,027	27,915	28,184	28,462	28,731	29,002	29,277	29,544	29,821	30,095	30,367	30,638	30,910
37	22,319	24,829	26,747	28,690	28,971	29,252	29,532	29,810	30,092	30,375	30,655	30,935	31,218	31,498	31,774
38	22,922	25,500	27,470	29,468	29,754	30,041	30,328	30,619	30,902	31,192	31,480	31,764	32,056	32,342	32,626
39	23,525	26,172	28,193	30,238	30,534	30,833	31,128	31,425	31,721	32,019	32,313	32,606	32,905	33,198	33,493
40	24,128	26,840	28,915	31,016	31,318	31,622	31,923	32,227	32,529	32,832	33,136	33,437	33,742	34,043	34,346
41	24,733	27,548	29,699	32,179	32,492	32,809	33,124	33,437	33,750	34,064	34,382	34,694	35,011	35,322	35,635
42	25,337	28,256	31,085	33,344	33,667	33,995	34,317	34,646	34,968	35,295	35,620	35,940	36,270	36,591	36,919
43	25,943	28,961	32,167	34,506	34,842	35,184	35,517	35,851	36,190	36,527	36,866	37,198	37,539	37,876	38,209
44	26,546	29,669	33,254	35,670	36,016	36,369	36,714	37,063	37,411	37,760	38,108	38,458	38,806	39,155	39,500
45	27,151	30,369	34,336	36,831	37,191	37,552	37,913	38,278	38,631	38,991	39,354	39,711	40,074	40,433	40,788
46	27,755	31,062	35,421	37,995	38,363	38,737	39,105	39,479	39,847	40,220	40,589	40,955	41,331	41,698	42,070
47	28,360	31,763	36,506	39,158	39,538	39,924	40,305	40,685	41,069	41,454	41,837	42,214	42,599	42,981	43,360
48	28,965	32,463	37,589	40,321	40,715	41,109	41,501	41,895	42,291	42,685	43,078	43,472	43,867	44,260	44,653

Note: At 40 hours this schedule reflects the \$104 per year COLA increase effective 3/16/96.

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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September 10, 1997