

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

RECEIVED  
SEP 11 4 43 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

---

POSTAL RATE AND FEE CHANGES, 1997

---

Docket No. R97-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF DOUGLAS CARLSON  
(DFC/USPS-T23-1 THROUGH 9)**

The United States Postal Service hereby files the responses of witness Miller to the following interrogatories of Douglas Carlson, filed on August 29, 1997: DFC/USPS-T23-1 through 9.

While these responses are being filed within 14 days of their receipt by the Postal Service and their filing at the Postal Rate Commission, they were mailed to the Postal Service on August 25, 1997, over 14 days ago. If these responses are therefore late, the Postal Service moves for late acceptance. The Postal Service is sending those responses to Mr. Carlson by Express Mail.

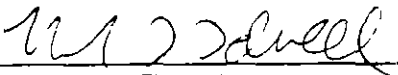
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202)268-2998/FAX: -5402  
September 11, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-1.**

- a. Please confirm that some mail will reject from the MPBCS-OSS because the RBCS ID tag did not print properly on the reverse side of the mail piece.
- b. Please confirm that a slick or glossy surface on the reverse side of a mail piece is one reason why the RBCS ID tag might not print properly on a mail piece.
- c. Please confirm that the mail described in part (a) may be directed to an LMLM so that a label can be applied to the reverse side of the mail piece.
- d. Of the mail described in part (a) that is directed to an LMLM, please estimate the percentage that is successfully processed through RBCS thereafter.
- e. Please estimate the percentage of the mail described in part (a) that is directed to a manual sorting operation instead of an LMLM or that is directed to an LMLM but cannot subsequently be processed successfully through RBCS (and then is directed to a manual sorting operation).

**RESPONSE:**

- a. b. Some mail pieces will be rejected because the MPBCS-OSS cannot read the ID tag. I am not aware of any study, however, that has analyzed the reason(s) why this might actually occur, including whether the ID tag did not "print properly."
- c. Confirmed.
- d. The percentage of LMLM mail that is accepted on the MPBCS-OSS when it is reprocessed was not included in the accept and upgrade rates study (USPS LR-H-130).  
  
In my testimony, I used the MPBCS-OSS accept rate (87.35%) to estimate this percentage.
- e. The accept and upgrade rates study (USPS LR-H-130) quantified the percentage of mail that was rejected on the MPBCS-OSS and sent to manual operations (0.95%). It did not, however, include a breakdown as to the reasons (e.g., an unreadable ID tag) why those mail pieces were rejected.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-2.** Please refer to your testimony at pages 4-5.

- a. Of the MPBCS-OSS rejects that are due to verifier errors for the Postnet bar code, please estimate the percentage of this mail that is directed to an LMLM machine and is successfully processed through RBCS thereafter.
- b. Please confirm that not all MPBCS-OSS mail that rejected because of verifier errors can be processed on the LMLM in the late hours of an operation due to processing windows and dispatch schedules.
- c. Please confirm that some verifier errors are caused by glossy or slick surfaces on mail pieces that prevent successful application of the Postnet bar code directly onto the surface of the mail pieces.
- d. Please confirm that some verifier errors on picture post cards of the type that people send while they are on vacation are caused when handwriting encroaches on the bar-code clear area.

**RESPONSE:**

- a. The percentage of LMLM mail that is accepted on the MPBCS-OSS when it is reprocessed was not included in the accept and upgrade rates study (USPS LR-H-130).  
  
In my testimony, I used the MPBCS-OSS accept rate (87.35%) to estimate this percentage.
- b. Confirmed.
- c. Some verifier rejects may occur on mail pieces with glossy/slick surfaces. I am not aware of any study, however, that has attempted to correlate MPBCS-OSS verifier errors to this specific mail piece characteristic.
- d. Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-3.**

- a. Please confirm that some mail has a surface texture that is glossy or slick enough to require the mail piece to be routed to an LMLM to apply a label on both the front side and reverse side of the mail piece.
- b. Please confirm that the situation described in part (a) normally occurs after the mail piece makes at least two passes through the MPBCS-OSS - that is, on one pass the problem with applying an RBCS ID tag is encountered, and on another pass the problem with spraying a Postnet bar code is encountered.
- c. Please confirm that glossy picture post cards of the type that people send while they are on vacation often must be routed to an LMLM to apply a label on both the front side and reverse side of the mail piece.

**RESPONSE:**

- a. Any mail piece that would require a LMLM label to be affixed over both the ID tag and the Postnet bar code would have had to be routed through some RBCS elements three times in order to receive a "good" bar code. The time constraints involved with RBCS processing would, in all likelihood, prevent this from actually occurring. Most facilities isolate MPBCS-OSS errors and process them separately. If such a mail piece were rejected a second time on the MPBCS-OSS, even if it were for a different reason, it would probably be sent to a manual sortation operation rather than routed back through RBCS.
- b. Were this situation to actually occur, at least two MPBCS-OSS passes would be required.
- c. As stated in a., most MPBCS-OSS errors would only be reprocessed through RBCS once and would be diverted to manual operations if rejected a second time. Therefore, the application of two LMLM labels, though possible, is an unlikely situation.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-4.**

- a. Please describe the characteristics, including surface texture, size, and type (i.e., card or letter), of the mail that often is routed to an LMLM.
- b. Are cards represented at the LMLM in a proportion greater than their proportion in the entire automated mail stream?
- c. Of all the mail that is diverted from RBCS manual sorting operations, are cards diverted in a greater proportion than their proportion in the entire automated mail stream?

**RESPONSE:**

- a. Mail pieces are rejected on the MPBCS-OSS and sent to the LMLM when two types of errors occur: Postnet "verifier errors" and "ID tag unreadable" errors. The LMLM is used to affix a label over the front of the mail piece in the first situation and over the back of the mail piece in the second situation. The reasons why these mail pieces are rejected, however, varies a great deal. I am not aware of any study that has been conducted which correlates MPBCS-OSS errors to specific mail piece characteristics. Therefore, I have no basis for discussing which specific characteristics would result in more frequent LMLM processing.
- b. I am not aware of any data which would provide a basis for answering this question.
- c. I am not aware of any data which would provide a basis for answering this question.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-5.**

- a. Please estimate the percentage increase in processing cost each time a mail piece must be routed to a LMLM. This cost should include the extra pass or passes that this mail must make through an MLOCR-ISS or MPBCS-OSS after the label is applied.
- b. All else being equal, to the extent that customers who presently prepare mail that must be processed on a LMLM at least once instead prepared their mail in a manner that obviated the need to route that mail to a LMLM, would processing costs for that mail decline?

**RESPONSE:**

- a. *I am unable to answer this question. In order to determine a "percentage increase in processing cost," it would have been necessary to develop complete models in my testimony. As stated in my testimony (page 3, lines 6-8), "It is not possible to develop extensive mail flow models as no single-piece density information is currently available."*
- b. Yes. However, it would be difficult to determine (at the time the mail pieces are prepared) whether those mail pieces would be processed on the LMLM and/or the future mail characteristics changes that would be required for those mail pieces to avoid all LMLM processing.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-6.** Please confirm that the flimsiness of some private post cards sometimes causes problems for automated processing.

**RESPONSE**

The "flimsiness" of a mail piece, whether it be a letter, card, or flat, can sometimes cause problems for automated processing. In order to fully understand the extent to which the "flimsiness" of a card affects automation, mail pieces with this specific characteristic would have to be identified, isolated and processed separately. Such an analysis would be difficult to conduct as these types of mail pieces are currently mixed with other cards and/or letters that have varied characteristics. To the best of my knowledge, this type of analysis has not been conducted.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-7.** Please confirm that the color or reflectance of the card stock used for private post cards sometimes causes problems for automated processing.

**RESPONSE**

The color and/or reflectance of a mail piece, whether it be a letter or a card, can sometimes cause problems for automated mail processing. This fact is especially evident during December when high volumes of greeting cards are being processed. As a result, many field sites attempt to isolate these mail pieces and divert them directly to manual sortation operations. In my experience, the darker colors seem to cause the most problems. The Postal Service has, however, attempted to minimize the impact color and reflectance have on automated processing in some operations. The Grayscale Camera described by USPS witness Moden (USPS-T-4, p. 5, line 24) is an example of a project that has been initiated to achieve this end.



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-8.** Comparing stamped post cards with private post cards, please confirm that private post cards are less likely than stamped cards to cause processing problems for the OCR and RBCS that are due to extraneous matter in the bar-code clear zone or the OCR read area.

**RESPONSE:**

This response assumes that "stamped post cards" refers to cards which can be purchased from the USPS where the proper postage has already been affixed to the mail piece. "Private post cards" is assumed to refer to those post cards where individuals affix the postage to the mail piece themselves.

Stamped post card and private post card users are responsible for addressing each mail piece themselves and, if the bar code zone is not clearly marked on the mail piece, can either write an address by hand or affix a label in a manner that interferes with the bar code clear zone. As a result, both stamped post cards and private post cards can experience a processing problem because extraneous matter encroaches into this area.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T23-9.** Comparing stamped post cards to private post cards, please confirm that stamped cards, on average, pose fewer obstacles to automated processing than private post cards and, therefore, can be processed at a lower cost than private post cards.

**RESPONSE:**

This response assumes that "stamped post cards" refers to cards which can be purchased from the USPS where the proper postage has already been affixed to the mail piece. "Private post cards" is assumed to refer to those post cards where individuals affix the postage to the mail piece themselves.

It seems that both mail pieces could possibly contain extraneous matter which might interfere with the Postnet bar code and/or the ID tag bar code. On the address side of the mail piece, as discussed in my response to DFC/USPS-T23-8, it is possible that both types of cards might contain Postnet bar code interference depending on where the address is placed by the user. In addition, the reverse side of these mail pieces would contain either text/graphics (stamped post cards) or pictures/graphics (private post cards) - both of which could interfere with the ID tag bar code. I have not studied what any related mail processing cost differences might be between these two types of cards.

CERTIFICATE OF SERVICE

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

  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1145  
September 11, 1997