

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

DOCKET SECTION

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Postal Rate and Fee Changes, 1997

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Docket No. R97-1
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
RALPH J. MODEN (NAA/USPS-T4-18-28)
September 16, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Ralph J. Moden (USPS-T-4) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By: William B. Baker
William B. Baker

WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

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

September 16, 1997

William B. Baker
William B. Baker

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NAA/USPS-T4-18. Please refer to your response to NAA/USPS-T4-5. Please provide the following figures. (If you cannot provide an exact percentage, an estimate will be adequate.)

- a. What percentage of ECR high density letters are barcoded by the mailer?
- b. What percentage of ECR saturation letters are barcoded by the mailer?
- c. What percentage of ECR high density letters are barcoded by the Postal Service?
- d. What percentage of ECR saturation letters are barcoded by the Postal Service?

NAA/USPS-T4-19. Please refer to your response to NAA/USPS-T4-5(f). You state that mailer barcoding of ECR saturation letter mail is advantageous for zones where it is cost effective to merge ECR saturation letters with their DPS mail.

- a. Please explain how the Postal Service determines whether it is cost effective to merge ECR saturation mail with DPS mail within a zone. What factors determine whether it is cost effective to merge this mail?
- b. Please provide the number of total zones within the Postal Service.
- c. What percentage of total zones are CSBCS zones?
- d. What percentage of total zones are DBCS zones?
- e. What percentage of total zones are manual zones?

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NAA/USPS-T4-20. Please refer to your response to NAA/USPS-T4-5(f). You note that letters are not eligible for the automated Carrier Route rate for DCBS zones.

- a. Are letters eligible for the ECR high density letter rate for DCBS zones? Please explain why or why not.
- b. Are letters eligible for the ECR saturation high density letter rate for DCBS zones? Please explain why or why not.

NAA/USPS-T4-21. Is it a goal of the Postal Service to have as much letter mail barcoded as possible? Please explain why or why not.

NAA/USPS-T4-22. Please refer to your response to NAA/USPS-T4-13 (b). You note that a doubling of mail volumes results in less than a doubling in workhours since "people generally work faster when there is a steady inventory of mail waiting to be processed..."

- a. Do managers take this tendency for people to work faster when there is a steady inventory of mail waiting to be processed into account when scheduling staff for a given shift? If yes, please explain how they calculate the needed staff for a given increase in mail volume.
- b. Do mail processors slow down as mail volumes begin to dwindle during their shift? Please explain.

NAA/USPS-T4-23. Please refer to arbitration decision by Arbitrator Snow dated June 9, 1997, regarding the use of "fourth bundles."

- a. Please describe the operating practices at issue in the June 9 arbitration decision, and particularly the type of mail carried in each of the four "bundles."

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- b. Is the June 9, 1997, arbitration decision final, in the sense that it is not subject to any further legal appeal? If not, please identify the status of that decision.
- c. To what type[s] of routes does the June 9, 1997, arbitration decision apply?
- d. Will the elimination of "fourth bundles" require carriers to perform additional casing than in a "fourth bundle" environment? If so, please indicate what costs would likely increase. If not, please explain why not.
- e. Please confirm that prior to the widespread implementation of automation, the "third bundle" typically consisted of advertising flats. If you cannot confirm, please explain why not.
- f. Please identify the cost segments and cost components most likely to be affected by the arbitration decision, and whether the decision is likely to lead to an increase or a decrease in costs accrued in such segments or components.
- g. Will the June 9, 1997, arbitration decision likely lead to an increase or a decrease in costs attributed to subclasses of mail? Please identify the likely direction of such changed cost attributions.

NAA/USPS-T4-24. Are "fourth bundles" used on types of carrier routes to which the June 9, 1997, arbitration decision does not apply? If so, please identify the type of routes and explain the uses of each of the bundles.

NAA/USPS-T4-25. Please describe how unaddressed flats are cased or otherwise handled in a vertical flats casing (VFC) environment?

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NAA/USPS-T4-26. What proportion of carrier offices are equipped with vertical flats cases? With horizontal flats cases?

NAA/USPS-T4-27. What proportion of park and loop and foot routes use the composite bundle work method?

NAA/USPS-T4-28. Please refer to the August 12, 1997, agreement between the Postal Service and the National Association of Letter Carriers to study work methods with and without unaddressed flats. Please confirm that the joint study referenced in the August 12, 1997, agreement is expected to be completed by April 30, 1998. If you cannot confirm, please provide a more accurate date.