

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE ASSOCIATION OF ALTERNATE POSTAL SYSTEMS
(AAPS/USPS-1-4)

The United States Postal Service hereby provides responses to the following interrogatories of the Association of Alternate Postal Systems: AAPS/USPS-1-4, filed on September 5, 1997. Objections to interrogatories AAPS/USPS-5 and 6 were filed on September 11 and September 15, respectively.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 19, 1997

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ASSOCIATION OF ALTERNATE POSTAL SYSTEMS

AAPS/USPS-1. Please confirm there has recently been an arbitrator's ruling that the Postal Service may not require carriers to carry four separate "bundles" on the street. If you can confirm this ruling, provide a copy of the arbitrator's decision.

RESPONSE:

On June 9, 1997, an arbitrator issued a national level award that restricts the Postal Service with regard to how detached label mailings are carried by city letter carriers on park and loop and foot routes, where DPS is implemented and where the composite bundle DPS work method is used. A copy of this ruling is filed as USPS LR-H-271. It is important to note that this ruling does not preclude the Postal Service and local union representatives from executing agreements at the local level that preserve the *status quo*.

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AAPS/USPS-2. Why did the Postal Service desire that its carriers carry four separate bundles?

RESPONSE:

This question rests on the mistaken premise that the Postal Service desired city carriers on park & loop and foot routes to carry "four separate bundles." With respect to flat size unaddressed pieces mailed with detached address labels, the Postal Service maintained that the unaddressed component of the detached label mailing was not a "fourth" bundle, but rather an extension of the flat-size bundle. This is because the unaddressed portion of the detached address label mailing did not require casing, but rather could be placed on the bottom or back of the flat bundle. This enabled carriers to retrieve mail from both ends of a single bundle composed of the unaddressed component of the detached label mailing on one end and addressed pieces of the same shape on the other end.

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AAPS/USPS-3. If a carrier that formerly carried four bundles may now carry only three bundles, explain how that carrier's activities in sorting and delivering the mail will be changed.

RESPONSE:

The award only affects city carriers that (1) are in a DPS environment, (2) are using the composite bundle work method, and (3) are assigned to park and loop or foot routes. All other carriers will continue to carry detached label mailings in the same manner as before. It is important to emphasize, however, that this ruling does not preclude the Postal Service and local union representatives from executing local agreements that preserve the *status quo*.

Other alternatives include the following:

- Some units may switch permanently from the composite bundle method (two bundles of letter mail and one bundle of flat mail) to the vertical flat casing (VFC) method (one combined bundle of residual letters and flats and a DPS letter bundle), which would make these units unaffected by this decision.
- Some units will elect to employ the VFC method on days on which detached address label mailings are to be delivered, thereby avoiding the creation of what the arbitrator considered to be a "fourth" bundle on those days.
- Some units may case or collate the unaddressed flats.

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AAPS/USPS-4. Please confirm that in accounting period 11, the quantity of Standard Mail (A) increased by 13.6 percent over the same period last year. If you can confirm an increase of this approximate size, please explain why, in the Postal Service's opinion, the amount of this mail has increased so rapidly.

RESPONSE:

The growth rate of Standard Mail (A) volume in AP 11 FY 97 relative to the same period last year stems primarily from growth in the Standard Mail (A) commercial subclasses, which are growing due to favorable business conditions in the US economy.

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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