

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268B0001

EXPERIMENTAL PRIORITY MAIL FLAT-RATE  
Box, 2004

Docket No. MC2004-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS LOETSCHER TO INTERROGATORY OF  
DAVID B. POPKIN  
(DBP/USPS-T3-11)  
(August 12, 2004)

The United States Postal Service hereby files witness Loetscher's response to the following interrogatory of David B. Popkin: DBP/USPS-T3-11, filed on July 29, 2004.

The 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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Richard T. Cooper

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**DBP/USPS-T3-11** Please refer to your responses to DBP/USPS-T3-8. [a] Please confirm that Tour 1 starts shortly before midnight and runs for approximately 8 hours and is responsible for sorting and processing incoming mail to the area of responsibility. [b] Please confirm that in those instances where you show three days, it entailed a short period prior to midnight as the first day of the three. [c] Please confirm that in those instances where you showed two days, the first day started at or shortly after midnight. [d] Please advise why you showed four days as the collection period [November 19-22] but only show three days of the week for Phoenix? [e] You indicated that different days of the week were selected for each site to spread observations across the week. Please confirm that the tally for the day of the week for the ten sites would show the following [assuming that we consider the day as the day of the majority of the time – for example, the Tour 1 starting just before midnight on Monday night and shown as MTW would be tallied as Tuesday and Wednesday]:

Monday	1
Tuesday	2
Wednesday	5
Thursday	8
Friday	4

[f] Please confirm that this tally does not show a reasonable spread throughout the days of the week. [g] Please advise the effect on the data collection that this uneven spread would cause. [h] Please confirm that November 11, 2002 and January, 2003 [a collection date at Jacksonville] are also postal holidays. [i] Please advise the effect you believe the collection of data on or about the day of a holiday would have. [j] Please explain any items you are unable to confirm.

**RESPONSE** [a-c] Not confirmed. While some sorting and processing of incoming Priority Mail is indeed conducted during Tour 1 (which typically starts around midnight and runs for approximately 8 hours), substantial such sorting and processing also was observed to occur in Tour 2 and Tour 3. In conducting the study we observed that the sorting of Priority Mail parcels to delivery unit occurred at various times of the day depending on the site and the arrival of mail from upstream facilities. Generally at the study sites, but not universally, the incoming Priority Mail operation began in the late afternoon [between 3:00 and

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**Response to DBP/USPS-T3-11 (cont.):**

7:00 pm] and went through the early morning [2:00 to 5:00 am]. In any case the exact timing and function of Tour 1 is not relevant in the context of this study.

At most sites sample pieces were drawn from incoming containers after they were unloaded and brought to a staging area for the incoming sortation operation. In these cases we attempted to have the majority of sample pieces drawn before the sortation operation began so as not to interrupt the operation. At some PMPC's sample pieces were drawn from containers exiting the sortation operation. The PMPC's incoming operations often occurred throughout the day depending on arrival of mail from upstream facilities and service commitments. In the study we worked closely with operations personnel to sample all Priority Mail flowing through the facility for approximately 48 hours. The days of the week shown in DBP/USPS-T3-8 represent days of the week in which there were more than 8 hours of data collection. When three days are shown it generally means that the data collection process began in the early to late afternoon of the first day and continued through the late morning or afternoon of the third day. When two days are shown it generally indicates that data collection began in the morning of the first day indicated and ended in the morning of the day after the last day. For example when MT is indicated data collection began on Monday morning and continued through early Wednesday morning. Because the bulk of hours were on Monday and Tuesday only MT was indicated.

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**Response to DBP/USPS-T3-11 (cont.):**

[d] Four calendar days are included for Phoenix because I inadvertently included Friday November 22 in the table. The data collection team returned on Friday November 22 but did not collect data.

[e-j] The days of the week listed in DBP/USPS-T3-8 indicate days of the week where more than 8 hours of data collection occurred at the site. A tally of days of the week by this criterion yields a tally of:

Monday	2
Tuesday	3
Wednesday	9
Thursday	8
Friday	4

The study's intent was to measure the characteristics of parcels within pound increment and not measure the volumes of parcels across pound increment. The spread of collected samples across days, proximity to postal holiday, or time of year would only affect the study if the packaging materials used or the density of items contained in the parcels were correlated with the day the parcels arrive at the destination facility. I know of no study or data that would indicate this to be the case.

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**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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