

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

REPOSITIONABLE NOTES PROVISIONAL SERVICE

Docket No. MC2004-5

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS HOLLAND
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-13-15)

The United States Postal Service hereby provides the responses of witness Holland to the following interrogatories of the Office of Consumer Advocate: OCA/USPS-T1-13-15, filed on August 12, 2004.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 23, 2004

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OCA/USPS-T1-13. Please refer to your testimony at 3, lines 9 – 23. There you describe the results of a “live’ flat-sized mail” test in November 2003. You state that RPNs placed on Standard Mail tabloid-like pieces were processed successfully on the AFSM 100.

- a. Please provide all documentation of the November 2003 “live” flats test, including the results of the test.
- b. In addition to the AFSM 100, please list all automation processing equipment for flats that may be used to process RPN flats during the course of the provisional test.
- c. Please state the types of facilities that house AFSM 100s and the flats automation equipment listed in response to part (b).
- d. Provide a detailed description of the processing steps performed on automatable flats in P & DCs. In particular, describe the steps performed on automatable flats when they are processed singly (as opposed to bundled or trayed).
 - i. Highlight any differences in the way flats are inserted into different flats automation equipment.
 - ii. Highlight any differences in the way flats travel through different flats automation equipment.
 - iii. Highlight any differences in the way flats exit the different flats automation equipment.
- e. Please give the percentage breakdown of flats automation equipment in the Postal Service processing network by type of equipment, e.g., AFSM 100s comprise what % of total flats automating equipment, etc.?

RESPONSE:

a. All the facts available on the November 2003 “live” test performed on flats are already included in the testimony you reference in your interrogatory. No formal documentation was developed for the purposes of this test as the test proved successful during all stages of processing and delivery.

b. We anticipate that the vast majority of flats with RPNs will be processed on AFSM 100s during the provisional test, with the possibility of a much smaller percentage of flats processed on UFSM 1000s. Currently, it is my understanding that approximately three-fourths of all flats processed on automated equipment are processed on AFSM

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100s, and the Postal Service continues to increase the percentage of flats processed on the AFSM 100s due to their greater efficiency. Based on the Postal Service's experience with its automated flats sorting equipment, it was determined that the AFSM 100 would most likely provide any evidence that the processing of RPNs on flats might prove to be problematic on automated flats sorting machines (which proved not to be the case), due to its much higher processing speed and its method of inducting flats via an automated feeder system, as compared to the slower option of manual induction as provided on the UFSM 1000. Flats that are processed in bundles can be processed on a SPBS or an APPS machine, but flats processed singly on automated equipment would be processed primarily on the AFSM 100 or the UFSM 1000.

c. AFSM 100s and UFSM 1000s reside in USPS Processing & Distribution Plants (P&DC) or in a P&DC annex. SPBS and APPs can be found in Processing & Distribution Centers, Bulk Mail Centers, and Auxiliary Sorting Facilities.

d. For general information on flats processing and equipment, see witness Kingsley's testimony (USPS-T-39 at 13-20) in Docket No. R2001-1. While I am not an expert in the details of these processing operations, it is my understanding that the precise steps taken to process these mailpieces depend on a number of variables.

e. It is my understanding that the Postal Service has 530 AFSM 100s currently in operation and 338 UFSM 1000s currently in use. The AFSM 100s comprise 61% of

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USPS flats automation equipment, however, as stated earlier, the percentage of flats processed on AFSM 100s is higher.

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OCA/USPS-T1-14. Please give a step-by-step description of the processing of non-automatable letters, including the facilities in which the processing takes place.

- a. Also, confirm that there has been no test of whether non-automatable RPN letters present problems in processing.
- b. If you do not confirm, then describe the test of non-automatable RPN letters, including the number of pieces tested, the testing location, and the results of the test.

RESPONSE: For general information on manual processing, see witness Kingsley's testimony (USPS-T-39 at 9 - 11 and 17) in Docket No. R2001-1. While I am not an expert in the details of these processing operations, it is my understanding that the steps taken to process these pieces can vary significantly based on the entry point, depth of presort, how the mail is containerized, etc.

a. I can confirm that there were no specific engineering tests on non-automation compatible letters bearing RPNs performed in terms of manual processing operations in plants. The overriding concern of experienced postal employees was whether RPN-bearing pieces would be compatible with automated processing. However, the live pilot test, which required the manual handling and delivery of the letters bearing the attached RPNs, would have obviously illuminated any non-automation issues, had they arisen, and none were reported.

b. N/A

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OCA/USPS-T1-15. Please give a step-by-step description of the processing of non-automatable flats, including the facilities in which the processing takes place.

- a. Also, confirm that there has been no test of whether non-automatable RPN flats present problems in processing.
- b. If you do not confirm, then describe the test of non-automatable RPN flats, including the number of pieces tested, the testing location, and the results of the test.

RESPONSE: For general information on manual processing, see witness Kingsley's testimony (USPS-T-39 at 9 - 11 and 17) in Docket No. R2001-1. While I am not an expert in the details of these processing operations, it is my understanding that the steps taken to process these pieces can vary significantly based on the entry point, depth of presort, how the mail is containerized, etc.

a. I can confirm that there were no specific engineering tests, in terms of manual processing operations in plants, on non-automation compatible flats bearing RPNs. The overriding concern of experienced postal employees was whether RPN-bearing flats would be compatible with automated processing, and that any possible problems that might arise with any manual operations would present themselves during the manual handling that is performed at destination delivery units during the casing and delivery of the mail. The "live' flat-sized mail" test in November 2003, as stated in my testimony at 3, lines 9 – 23, describes my observations of such manual casing and delivery of the RPN attached flat-size mailpieces, including my discussions with the carriers performing these manual operations, and no problems were observed by me or reported by the carriers of damaged or lost RPNs, either in the office or on the street, despite multiple

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handlings, nor did the RPNs, according to the carriers, necessitate any special or additional manual handing in their delivery compared to flats with no RPNs attached.

b. N/A

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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