

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-T1-16)

The United States Postal Service hereby provides the responses of witness Holland to the following interrogatory of the Office of Consumer Advocate: OCA/USPS-T1-16, filed on August 16, 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.  
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August 26, 2004

RESPONSE OF POSTAL SERVICE WITNESS HOLLAND  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-16. Please refer to Library Reference 2, "Materials in Response to Interrogatories OCA/USPS-T1-5 and OCA/USPS-T1-6."

- a. Please confirm that the Mail Toppers Test (pp 1- 6 of LR 2) yielded results such as "Significant Damage to Post-it" and "Post-It Note Moved."
  - i. If you do not confirm, explain why not.
  - ii. If you do confirm, then doesn't it seem plausible that significantly damaged Post-its and movement of Post-its could eventually produce machine jams? Please explain any negative answer.
  
- b. Please confirm that at page 8 of LR 2, the statement is made, "After completing each machine processing run significant Post-It Note paper fiber and scraps were noted in the machine separation and address reading areas. The 8 missing Post-It notes were found in these areas."
  
- c. With respect to the statement set forth in part (b), doesn't it seem plausible that paper fiber, scraps, and detached Post-It Notes might cause machine jams? If you do not agree, please explain.
  
- d. With respect to the statement set forth in part (b), doesn't it seem plausible that significant increases in paper fiber, scraps, and detached Post-It Notes will cause an increase to maintenance costs? If you do not agree, please explain. If you do agree, what are the Postal Service's plans to collect information on increased maintenance costs during the provisional period?
  
- e. Please confirm that pages 19 – 20 of LR 20 contain photos following RPN tests with the following captions:
  - "Yellow Post it Note Pieces in Machine Induction Area"
  - "Yellow Post it Note pieces/fibers in the machine reader area"If you do not confirm, please explain why not.
  
- f. Please confirm that page 2 of LR 2 , the test observation form for the "No. 10 Envelope with Adhesive on Right Hand Edge," includes the statement, "Damage to notes start on right leading edge, Initially nicks, later torn back, peeled off."
  - i. If you do not confirm, explain why not.
  - ii. If you do confirm, then doesn't it seem plausible the nicked, torn back, and peeled off RPNs could eventually produce machine jams? Please explain any negative answer.
  
- g. Please confirm that pages 2 – 6 of LR 2 report that there is much more significant damage to Post-it Notes that are placed along the Right Hand Leading Edge as compared to Post-it Notes that are placed along the top Horizontal Edge. If you do not confirm, please explain why not.
  
- h. Please refer to page 8 of LR 2. Please confirm that Test 2 includes the statement, "Envelopes with yellow Post-It Notes having adhesive on the right

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leading vertical edge, experienced a total of 120 rejects, above the 111 limit, resulting in test failure.”

- i. Please confirm that on page 8 of LR 2, it is reported that, “The failed outcome of envelopes with Notes having adhesive on the leading vertical edge was unexpected.” Also confirm that out of 62 envelopes with white Post-It Notes “repositioned so that the adhesive edge was on the right vertical leading edge,” there were 22 rejects out of an initial 62 pieces. If you do not confirm, please explain why not.
- j. Also confirm that 82 envelopes with yellow Post-It Notes “having adhesive initially on the right vertical leading edge were repositioned so that the adhesive was on the top horizontal edge;” and that such an orientation resulted in “all 82 pieces . . . run through the DBCS three times with no failures.” (LR 2 at page 8) If you do not confirm, please explain why not.
- k. Confirm that the overall conclusion from the 8/29/00 test at Merrifield (LR 2 at 8) is: “Based on test results it appeared that note adhesive orientation was important. The color of the note did not appear to be the issue, the adhesive orientation did.” If you do not confirm, please explain.
- l. In light of the observations noted in parts (f) – (k) of in instant interrogatory, does the Postal Service allow placement of RPNs in any orientation other than with the adhesive edge running parallel to the top of the host mailpiece? If so, why? If not, what provisions of the DMM require placement of the RPN solely with the adhesive strip running parallel to the top edge of the host mailpiece?
- m. For mailpieces not hosting RPNs, how common is it for pieces of envelopes to be torn off and shredded? Do such incidents cause jams in Multiline Optical Character Reader (MLOCR) and Bar Code Sorter (BCS) equipment? Please discuss.
- n. On March 6, 2002, Susan Campbell, Manager, Product Management – Letters, wrote to Plant Managers and District Managers, Business Mail Entry. She informed them of the RPN Pilot Test and attached a “Repositionable Notes Feedback Form.” (LR 2 at 21- 23).
  - i. How many of the Repositionable Notes Feedback Forms were returned to Ms. Campbell?
  - ii. Are the results of forms returned to Ms. Campbell contained in LR 2? If so, please cite the pages containing the results of returned Repositionable Notes Feedback Forms. If not, please provide the form results.

RESPONSE OF POSTAL SERVICE WITNESS HOLLAND  
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RESPONSE:

- a. Confirmed.
  - i. N/A
  - ii. No. As a result of this test, we changed the specifications, characteristics, and position of the adhesive on the note to avoid these problems.
- b. Confirmed.
- c. No. As result of this test we changed the specifications, characteristics, and position of the adhesive on the note to avoid these problems.
- d. No. This test was with the adhesive on the right vertical leading edge. By changing location of the adhesive to the top horizontal edge, the problems cited, and the need for increased maintenance, are avoided.
- e. Confirmed.
- f. Confirmed.
  - i. N/A
  - ii. No. These test results prompted a change in the location of the adhesive from the right edge to the top edge. See DMM C810.7.5.
- g. Confirmed. DMM C810.7.5(e) specifies that the adhesive is to be located on the top horizontal edge.
- h. Confirmed.
- i. Confirmed. It was anticipated, at least intuitively, that the right leading edge would be the optimal placement for the adhesive.

RESPONSE OF POSTAL SERVICE WITNESS HOLLAND  
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- j. Confirmed.
- k. Confirmed. The testing showed that orienting the adhesive on the top horizontal edge was the optimal placement.
- l. No. See DMM C810.7.5.
- m. On rare occasions mailpieces may be damaged when processed, and may at times cause jams in mail processing equipment.
- n.
  - i. There were only two forms returned to Ms. Campbell. Neither form reported a problem that was due to the attachment of RPNs. One form reported a problem with a non-RPN mailing. The other involved a situation where the normal "jogging" (shaking and aligning) of the mail prior to induction into the machine was not performed.
  - ii. Copies of the responses were not retained.

## **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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