

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF POSTAL SERVICE WITNESS STEVENS
TO OCA INTERROGATORIES
REDIRECTED FROM WITNESS BRADLEY
[OCA/USPS-T14-1a.ii, b.i]
(April 27, 2005)

The United States Postal Service hereby responds to above-listed interrogatories of the Office of the Consumer Advocate, filed on April 12, 2005. These interrogatories were redirected from witness Bradley.

Each 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

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993, Fax -5402

RESPONSE OF POSTAL SERVICE WITNESS DENNIS P. STEVENS
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS BRADLEY

OCA/USPS-T14-1. Please refer to the testimony of witness Jeffery W. Lewis (USPS-T-30).

a. At page 3, lines 13-16, witness Lewis states that "adding bundles results in carriers retrieving mail from more sources when delivering mail on the street. For example, carriers must check and withdraw mail from the bundle of DPS letters, from the bundle of cased mail, and from each of the additional bundles taken directly to the street."

* * * * *

ii. Please confirm that Library Reference K-80 contains a dataset--AL161ZIPS.PRN--with 40,668 Zip-date-route records of volumes for delivery-point-sequenced (DPS) letters, non-DPS (i.e., cased) automation letters, non-DPS (i.e., cased) non-automation (i.e., "other") letters, cased flats, and sequenced mail volumes.

b. At page 4, lines 2-5, witness Lewis states that there has been "an increase in curblines, cluster box (CBU), and centralized deliveries and virtually [no] growth of door delivery. Over time, as these modes of delivery have grown as a percentage of total deliveries, this change has fueled an increase in carrier street productivity."

i. Please confirm that DOIS maintains number of possible delivery points by type for each route. (See LR-K-80 at 1.) If you do not confirm, please explain.

OCA/USPS-T14-1a.ii. **Response**

Confirmed.

OCA/USPS-T14-1b.i. **Response**

In LR-K-80 at 1, type refers to delivery mode. See T14-1b.ii. DOIS maintains delivery points by delivery mode.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Richard T. Cooper

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Washington, D.C. 20260-1137
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