

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes

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Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE (OCA/USPS-4-6)  
(April 27, 2005)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-4. Please refer to the response of witness Bradley to interrogatory OCA/USPS-T14-1.a.i. He states, "To my knowledge no data exists on number of bundles actually carried by individual carriers on a daily basis."

- a. Does the Postal Service collect data "on number of bundles actually carried by individual carriers on a daily basis"? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.
- b. Does the Postal Service collect data "on number of bundles actually carried by individual carriers on a daily basis" during route evaluations? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.
- c. Does the Postal Service collect data on number of bundles taken to the street by individual carriers on a daily basis? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.
- d. Does the Postal Service collect data on number of sequenced bundles taken to the street by individual carriers on a daily basis? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.
- e. Does the Postal Service collect data on number of bundles taken to the street by individual carriers on a basis other than daily? If so, please (1) describe the data and (2) provide that data for the routes in witness Bradley's analysis for a time period as close as possible to the dates of data collection for the Bradley analysis.

- f. Does the Postal Service at any management level record the dates when a given sequenced mailing is actually delivered on a particular route? If so, please (1) describe the process for recording the data and (2) provide that data for the days and routes in witness Bradley's analysis.

OCA/USPS-5. Do any postal employees receive training in the use or maintenance of DOIS? If so, please describe the training and provide (1) copies of training materials and (2) copies of Postal Service documents referred to in the training materials.

OCA/USPS-6. Please refer to the response of witness Bradley to interrogatory OCA/USPS-T14-3.c. He states, "Route miles' . . . were not collected in the City Carrier Street Time Study . . . ."

- a. Do carriers travel a specified line of travel when performing the delivery function for letters, flats, sequenced mail and small parcels? If not, under what circumstances would a carrier deviate from the authorized line of travel to deliver letters, flats, sequenced mail, or small parcels?
- b. Is the length of the authorized line of travel for the routes in witness Bradley's analysis known or recorded at any management level in the Postal Service? If so, please provide the lengths by route identifier.