

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

Postal Rate Commission
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POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN (ABA&NAPM/USPS-T21-1-19)
(May 3, 2005)

Pursuant to sections 26 and 27 of the Postal Rate Commission rules of practice, American Bankers Association and National Association of Presort Mailers hereby submit these joint interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
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May 3, 2005
Washington, D.C.

ABA&NAPM/USPS-T21-1.

Please refer to the library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet “PRODUCTIVITY.” For each of the MODS operational groups listed in the following table, please provide the following items:

- i) The detailed sequence of activities that constitute this group, at the most disaggregated level.
- ii) The corresponding IOCS activity code.
- iii) The corresponding LDC code.
- iv) The cost associated with each activity.
- v) The productivity associated with each activity.
- vi) State if each of the activities included is worksharing or non-worksharing related.

MODS Operational Groups List:

Outgoing ISS
Incoming ISS
REC
LMLM
Outgoing OSS
Incoming OSS
Outgoing BCS Primary
Outgoing BCS Secondary
Incoming BCS MMP
Incoming BCS SCF/Primary
Incoming BCS Secondary Carrier Route (1 Pass)
Incoming BCS Secondary DPS (2 Pass)
Incoming CSBCS Secondary DPS (3 Pass)
Manual Outgoing Primary
Manual Outgoing Secondary
Manual ADC (in MMP)
Manual Incoming SCF/Primary
Manual Incoming Secondary, MODS Site
Manual Incoming Secondary Non MODS Sites
P.O. Box Sort DPS
P.O. Box Sort Other
Tray Opening Unit Bundle Sorting

ABA&NAPM/USPS-T21-2.

Please refer to the library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Outgoing ISS," the variability factor is given to be 0.780. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.220 (1-0.780).

ABA&NAPM/USPS-T21-3.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming ISS," the variability factor is given to be 0.770. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.220 (1-0.780).

ABA&NAPM/USPS-T21-4.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational groups "Outgoing ISS" and "Incoming ISS" the variability factors are given to be both 0.856 & 0.881, respectively. Please explain why these two operation groups have different variability factor, whereas they are the same for "Outgoing ISS" and "Incoming ISS" which are both 0.780.

ABA&NAPM/USPS-T21-5.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Outgoing OSS," the variability factor is given to be 0.856. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.144 (1-0.856).

ABA&NAPM/USPS-T21-6.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Outgoing OSS," the variability factor is given to be 0.856, whereas, the comparable number for R2001-1 was 0.896. Please indicate what specific factors have resulted for the drop in variability factor for this operation.

ABA&NAPM/USPS-T21-7.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming OSS," the variability factor is given to be 0.881. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.119 (1-0.881).

ABA&NAPM/USPS-T21-8.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming OSS," the variability factor is given to be 0.881, whereas, the comparable number for R2001-1 was 0.926. Please indicate what specific factors have resulted for the drop in variability factor for this operation.

ABA&NAPM/USPS-T21-9.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. Please explain why the variability factors for OSS operations are larger than ISS operations.

ABA&NAPM/USPS-T21-10.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Outgoing BCS Primary," the variability factor is given to be 0.851. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.149 (1-0.851).

ABA&NAPM/USPS-T21-11.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Outgoing BCS Secondary," the variability factor is given to be 0.857. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.143 (1-0.857).

ABA&NAPM/USPS-T21-12.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming BCS MMP," the variability factor is given to be 0.857. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.143 (1-0.857).

ABA&NAPM/USPS-T21-13.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming BCS SCF/Primary," the variability factor is given to be 0.863. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.137 (1-0.863).

ABA&NAPM/USPS-T21-14.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming BCS Secondary Carrier Route," the variability factor is given to be 0.863. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.137 (1-0.863).

ABA&NAPM/USPS-T21-15.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Incoming BCS Secondary DPS (2 Pass)" and "Incoming CSBSC Secondary DPS (3 Pass)," the variability factor are both given to be 0.850. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.150 (1-0.850). Furthermore, explain why these two operation groups have the same values.

ABA&NAPM/USPS-T21-16.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Manual Outgoing Primary," "Manual Outgoing Secondary," "Manual ADC," "Manual Incoming SCF/Primary," and "Manual Incoming Secondary, MODS Sites," are all given to be 0.870. Please indicate what specific activities you consider to be non-variability factors accounting for the 0.130 (1-0.870). Furthermore, explain why all these operations have the same values.

ABA&NAPM/USPS-T21-17.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Manual Outgoing Primary," "Manual Outgoing Secondary," "Manual ADC," "Manual Incoming SCF/Primary," and "Manual Incoming Secondary, MODS Sites," are all given to be 0.870, whereas the same they were only 580 in R200-1. Please indicate what specific factors resulted in such an increase in the variability factor for these operations.

ABA&NAPM/USPS-T21-18.

Please refer to the Library reference USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "PRODUCTIVITY," column [2]. For the MODS operational group "Manual Incoming Secondary Non MODS Sites," the variability factor is given to be 1.000. Please explain why the variability factor for this operation is 100%. Furthermore, explain why for this manual operation the variability factor is greatly larger than for the ones stated in question ABA&NAPM/USPS-T21-17.

ABA&NAPM/USPS-T21-19.

Please refer to the USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "ENTRY PROFILE." For the entire rate categories listed in this table the entry profiles are obtained from Docket No. R971-1, LR-H-185. Please confirm that between R97-1 and R2005-1 the values have not changed. If confirmed, please explain why you expect no change. If not confirmed, please explain why there was no study to update the entry profile data.