

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

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JEFFERY W. LEWIS
(OCA/USPS-T30-1-7)
(May 3, 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-T30-1. Witness Stevens indicates that your testimony provides a “more complete discussion of DOIS (Delivery Operations Information System).” USPS-T-15 at 23.

- a. Have you (or others) furnished documentation of DOIS in the current rate case? If so, please provide full citations. If not, then please furnish complete DOIS documentation.
- b. Is it correct that DOIS documentation is only available through the Postal Service’s intra-net? If not, then please explain.
- c. On what date was DOIS first introduced to delivery offices? On that date, how many offices were placed under DOIS?
- d. At the present time, how many delivery offices operate under DOIS?
- e. How many delivery offices do not operate under DOIS?
- f. What is the total number of delivery offices?
- g. Is DOIS used in delivery offices that include city carrier routes?
- h. Is DOIS used in delivery offices that include rural carrier routes?
- i. What is the number of delivery offices that consist solely of city carrier routes and do not include any rural carrier routes?
- j. What is the number of delivery offices that consist solely of rural carrier routes and do not include any city carrier routes?
- k. What is the number of delivery offices that consist of a mix of city and rural carrier routes?

- I. If the figures given in response to parts i., j. and k. do not equal the figure given in response to part f., then what offices would be included in the remainder? Please describe in full.
- m. Please give the number of delivery offices consisting solely of city carrier routes that operate under DOIS.
- n. Please give the number of delivery offices consisting of a mix of city and rural carrier routes that operate under DOIS.
- o. Are DOIS reports ever generated by or for headquarters? If so, please list all such reports, including their purpose and the information contained in them.

OCA/USPS-T30-2. Please refer to your testimony at page 6.

- a. Have you (or others) furnished documentation of the Piece Count Recording System (PCRS) in the current rate case? If so, please provide full citations. If not, then please furnish complete PCRS documentation.
- b. Give a detailed description of how PCRS integrates mail counting procedures with the automated mail processing equipment. Give separate descriptions for each distinct shape of mail, e.g., letters, flats, and packages, and the type of automated equipment used to sort the mail, e.g., Barcode Sorters (BCS); Automatic Flat Sorting Machines (AFSM), by type of AFSM; Small Package and Bundle Sorters (SPBS); Parcel Sorting Machines (PSM), etc. Please give a complete set of descriptions for all types of automated equipment used in PCRS.
- c. Please give a detailed description of how PCRS improves and standardizes procedures for measuring and converting mail handled outside the automated

- mailstream. Please give a complete set of descriptions for all types of non-automated mail.
- d. Does PCRS consist of filling in forms or tables? If so, then provide the forms or tables used in PCRS. If not, are other standardized types of data put into PCRS? List all such types of data collected.
 - e. On what date was PCRS first introduced to delivery offices? On that date, how many offices were placed under PCRS?
 - f. At the present time, how many delivery offices operate under PCRS?
 - g. How many delivery offices do not operate under PCRS?
 - h. Is PCRS used in delivery offices that include city carrier routes?
 - i. Is PCRS used in delivery offices that include rural carrier routes?
 - j. Please give the number of delivery offices consisting solely of city carrier routes that operate under PCRS.
 - k. Please give the number of delivery offices consisting of a mix of city and rural carrier routes that operate under PCRS.
 - l. Are PCRS reports ever generated by or for headquarters? If so, please list all such reports, including their purpose and the information contained in them.

OCA/USPS-T30-3. Please refer to your testimony at page 6.

- a. Have you (or others) furnished documentation of the Time and Attendance Control System (TACS) in the current rate case? If so, please provide full citations. If not, then please furnish complete TACS documentation.

- b. Does TACS consist of filling in forms or tables? If so, then provide the forms or tables used in TACS. If not, are other standardized types of data put into TACS? List all such types of data collected.
- c. On what date was TACS first introduced to delivery offices? On that date, how many offices were placed under TACS?
- d. At the present time, how many delivery offices operate under TACS?
- e. How many delivery offices do not operate under TACS?
- f. Is TACS used in delivery offices that include city carrier routes?
- g. Is TACS used in delivery offices that include rural carrier routes?
- h. Please give the number of delivery offices consisting solely of city carrier routes that operate under TACS.
- i. Please give the number of delivery offices consisting of a mix of city and rural carrier routes that operate under TACS.
- j. Are TACS reports ever generated by or for headquarters? If so, please list all such reports, including their purpose and the information contained in them.

OCA/USPS-T30-4. Please refer to your testimony at pages 6 -7.

- a. Have you (or others) furnished documentation of the Managed Service Point (MSP) system in the current rate case? If so, please provide full citations. If not, then please furnish complete MSP documentation.
- b. Does MSP consist of filling in forms or tables? If so, then provide the forms or tables used in MSP. If not, are other standardized types of data put into MSP? List all such types of data collected.

- c. On what date was MSP first introduced to delivery offices? On that date, how many offices were placed under MSP?
- d. At the present time, how many delivery offices operate under MSP?
- e. How many delivery offices do not operate under MSP?
- f. Is MSP used in delivery offices that include city carrier routes?
- g. Is MSP used in delivery offices that include rural carrier routes?
- h. Please give the number of delivery offices consisting solely of city carrier routes that operate under MSP.
- i. Please give the number of delivery offices consisting of a mix of city and rural carrier routes that operate under MSP.
- j. Are MSP reports ever generated by or for headquarters? If so, please list all such reports, including their purpose and the information contained in them.

OCA/USPS-T30-5. Please refer to your testimony at page 7 where you describe the capabilities of the "DOIS system interfaces."

- a. Describe in detail what you mean by that phrase.
- b. Please provide the complete DOIS system interface database from the time it was first implemented through today.
- c. Provide separate fields for delivery offices broken down: by delivery day, by carrier, by hours worked per carrier, by volume workload for each carrier day that corresponds to the hours worked, by DPS letters, by non-DPS-letters, by flat shape, by package shape, and by number of bundles.

- d. On what date was the DOIS system interface first introduced to delivery offices? On that date, how many offices were placed under the DOIS system interface?
- e. At the present time, how many delivery offices operate under the DOIS system interface?
- f. How many delivery offices do not operate under the DOIS system interface?
- g. Is the DOIS system interface used in delivery offices that include city carrier routes?
- h. Is the DOIS system interface used in delivery offices that include rural carrier routes?
- i. Please give the number of delivery offices consisting solely of city carrier routes that operate under the DOIS system interface.
- j. Please give the number of delivery offices consisting of a mix of city and rural carrier routes that operate under the DOIS system interface.
- k. Are DOIS system interface reports ever generated by or for headquarters? If so, please list all such reports, including their purpose and the information contained in them.

OCA/USPS-T30-6. Please refer to your testimony at page 7.

- a. Have you (or others) furnished documentation of the Route Pivoting feature in the current rate case? If so, please provide full citations. If not, then please furnish complete Route Pivoting documentation.
- b. Does the Route Pivoting feature consist of filling in forms or tables? If so, then provide the forms or tables used in the Route Pivoting feature. If not, are

other standardized types of data put into the Route Pivoting feature? List all such types of data collected.

OCA/USPS-T30-7. Does the Postal Service possess any data systems or databases other than those mentioned in the above interrogatories that contain (1) delivered volumes by date, by ZIP Code, by shape or (2) street workhours by date, by ZIP Code? If so, please identify, describe, and provide documentation for those systems or databases.