

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

RESPONSE OF POSTAL SERVICE WITNESS MARC D. McCRERY
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION,
REDIRECTED FROM WITNESS JOHN KELLEY
(MMA/USPS-T16-5)
(May 6, 2005)

The United States Postal Service hereby responds to the above-listed interrogatory of Major Mailers Association., filed on April 22, 2005. The interrogatory was redirected from witness John Kelley.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS MARC D. McCRERY TO INTERROGATORY
OF MAJOR MAILERS ASSOCIATION,
REDIRECTED FROM WITNESS JOHN KELLEY (USPS-T-16)

MMA/USPS-T-16-5

Please refer to R2001-1, TR 5/666 and TR 5/859, where USPS witness Schenk discussed the impact of worksharing (presortation) on delivery costs. Please compare two machinable letters that are to be delivered by a city carrier. In making this comparison, please assume that both machinable letters are identical except one letter is prebarcoded and presorted whereas the other is not prebarcoded or presorted.

- A. On average, if both letters are processed through the Postal Service, what is the likelihood that one letter will be DPSed while the other letter will not be DPSed? Please explain your answer.

Response:

If the two letters are, in fact, identical with the same machine printed delivery point address elements, the likelihood of DPS sortation for each piece would not be significantly different. However, a factor to consider is the non-prebarcoded, non-presorted piece is certain to require at least one additional processing step, and during each automated handling there is a chance that an event may occur (e.g. jam) that could result in the piece being removed from the automated mail stream. Furthermore, the required additional handlings could increase the likelihood of the piece missing the DPS processing window.

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.

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