

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 THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OCA (OCA/USPS-4 - 6)  
(May 11, 2005)

The United States Postal Service hereby provides its responses to the following interrogatories of the OCA, filed on April 27, 2005: OCA/USPS-4 - 6. Partial objections to questions 5 and 6 were filed on May 9, 2005, and in providing these responses, the Postal Service does not intend to waive those objections..

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 11, 2005

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

**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.

**Response**

a, c - e. The Postal Service does not record the number of bundles carriers take to the street.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

b. During Mail Count and Route Inspection procedures, route examiners record the volume of mail carriers deliver, but do not collect data on the number of bundles carriers take to the street.

f. ADVANCE is a national system the Postal Service uses to record and track the actual delivery dates for specified mailings but field offices provide the ADVANCE data at the delivery unit level, rather than the route level.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

**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.

**Response**

The Postal Service provides interactive WEB-based DOIS training for delivery supervisors and managers. Because the training is on-line, there are no hard copy training materials.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

**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.

**Response**

a. Assuming no other intervening factors, carriers are expected to follow the authorized line of travel from the office to the route, through their delivery assignment, and when returning from the route to the office. Please see the direct testimony of witness Lewis, USPS-T-30, page 10, lines 3 through 9. The list of potential intervening factors, however, can be quite extensive. A few examples include the delivery of accountables or large packages that cannot fit in the mail receptacles; hand offs of segments of the route to another carrier on heavy days; receiving hand-offs from other carriers on light days; the construction of a fence that does not allow the carrier to cut across a lawn; a detour forced by road construction; a menacing dog in the line of travel; interaction with a customer; etc.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

b. Each motorized city delivery route has a specified authorized mileage.

Without waiving its objection, the Postal Service is endeavoring to ascertain whether reasonable means exist to obtain the route length data corresponding to the routes in Prof. Bradley's analysis, given that three years have elapsed since the data used in his study were collected.

## 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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