

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 UNITED STATES POSTAL SERVICE WITNESS KAY  
TO INTERROGATORY OF ADVO, INC. (ADVO/USPS-T18-1)  
(May 31, 2005)

The United States Postal Service hereby provides the response of witness Kay to the following interrogatory of Advo, Inc., filed on May 16, 2005: ADVO/USPS-T18-1.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

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May 31, 2005

**Response of United States Postal Service Witness Nancy R. Kay  
To Interrogatory by ADVO, Inc.**

**ADVO/USPS-T18-1.** LR-K-71 states that the input data for your Rural Carrier Mail Count Data come from two sources. FY2003.RURFLAT.dat is a text file containing the rural carrier mail count evaluation for each route as of FY 2003 PQ 4. It contains 69,318 observations. FY2004.RURFLAT.dat is a text file containing the rural carrier mail count evaluation for each route as of FY 2004 PQ 4. It contains 70,212 observations.

- (a) The USPS FY04 Annual Report states that there were 61,611 full-time rural carriers in FY03 and 62,762 full-time rural carriers in FY04. Your two data files appear to be a 100% census of all National Mail Count data taken in each of the two years. If this is not correct, please explain fully.
- (b) What portion of total rural carriers was counted in FY03 and FY04?
- (c) Please state when the National Mail Count shape and processing/handling definitions changed to be consistent with those of the DMM/RPW.
- (d) Please identify the time periods over which the FY03 and FY04 National Mail Counts were taken.

**RESPONSE**

- (a) The National Mail Count (NMC) data for FY 2003 contains the most current evaluation for each rural route as of PQ4 FY 2003. The NMC data for FY 2004 contains the most current evaluation for each rural route as of PQ4 FY 2004. The FY 2003 NMC data file includes 48,558 routes where the evaluation is marked as taking place in 2003. The FY 2004 NMC data file includes 45,302 routes where the evaluation is marked as taking place in 2004.

Please note that the FY2003.RURLFLAT.DAT includes 61,605 evaluated routes, 7,698 auxillary routes, and 15 mileage routes. FY2004.RURLFLAT.DAT includes 62,773 evaluated routes, 7,727 auxillary routes, and 12 mileage routes. Auxillary routes are evaluated at less than 39 hours a week, and are thus not considered full time routes.

**Response of United States Postal Service Witness Nancy R. Kay  
To Interrogatory by ADV0, Inc.**

The pay for carriers on mileage routes is based solely on the mileage of the route, and the evaluated hours are not applicable.

- (b) In FY 2003, 66% of evaluated and 99% of auxillary routes received an evaluation in FY 2003, for an overall participation rate of 70%. In FY 2004, 60% of evaluated and 99% of auxillary routes received an evaluation in FY 2004, for an overall participation rate of 65%.
- (c) The Interest Arbitration Proceedings between the United States Postal Service and the National Rural Letter Carriers Association is dated February 3, 2002. The first NMC using the arbitrated standards took place from February 28 to March 3, 2002, and included every rural route. The effective date for the new NMC was May 4, 2002. Please note the following new standards defined in the proceedings:

Flat mail casing will be credited at 10 pieces per minute.  
Letter mail casing will be credited at 18 pieces per minute.  
Strapout of mail will be credited at 70 pieces per minute.  
The definition of letter size mail will increase from 5 inches to 6 1/8 inches in width. (p. 24)

- (d) The proceedings discussed in the answer to part c above also stipulated the time periods for the NMC:

In 2003, a national mail count will be conducted on all rural routes for twenty-four (24) working days beginning with the Saturday preceding the Presidents' Day Holiday in February.

In 2004, a national mail count will be conducted on all rural routes for eighteen (18) working days beginning with the Saturday preceding the Presidents' Day Holiday in February.

## 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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May 31, 2005