

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

Postal Rate and Fee Changes

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Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE (OCA/USPS-140-144)
(June 9, 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-140. Please provide by ZIP (encoded), by route, by date, for all ZIPs for which any data were collected for the CCSTS, the following information. The OCA will accept data from any source and in any medium.

- a. The number of delivery points by route section by mode (Foot, NDCBU, etc.)
- b. The number of sequenced mailings
- c. The number of sequenced mailings with detached address labels
- d. Number of carriers who delivered mail on a route
- e. Volume by shape for each carrier who delivered mail on a route
- f. Overtime street hours (actual or projected)
- g. Routes without an assigned carrier
- h. Volume in bulk deliveries by shape
- i. Carrier Type (e.g., REG, PTF, T-6, etc.) for each carrier who delivered mail on a route

OCA/USPS-141. Is DOIS a database (as witness Stevens states at page 23, line 5 of his testimony)? If not, what is it? If so, in what language and format is it written and stored, and what time period does it cover?

OCA/USPS-142. Is DOIS "linked" to other databases (see USPS-T-15, page 23, line 7)? If not, please explain. If so, please list and describe all databases to which DOIS is linked.

OCA/USPS-143. Please list and describe all Postal Service databases (including archives) at any level of management that contain information for any dates for any routes in any ZIPs for which any data were collected for the CCSTS relating to delivered volumes, street time, street activities, carrier type (e.g., REG, PTF, T-6, etc.), overtime street hours (actual or projected), modes (Foot, NDCBU, etc.) for route sections and/or delivery points, number of carriers who delivered mail on a route on the same date, volume delivered by each carrier who delivered mail on a route on the same date, number of routes without an assigned carrier, volume by shape in bulk deliveries, number of sequenced mailings by shape.

OCA/USPS-144. This interrogatory concerns the Address Management System (AMS).

- a. Please list and describe the data fields maintained in or accessible by AMS.
- b. Please describe the algorithm or procedure by which AMS classifies routes as Business Foot, Residential Park and Loop, etc.
- c. Please describe the procedures and protocols that allow data from individual delivery units or offices to be transmitted to AMS.
- d. Witness Kelley has stated that he “obtain[ed] total possible delivery points by delivery mode from the FY 2004 Address Management System (AMS).”¹ Does “delivery mode” refer to an entire route or to route sections?
- e. Please provide a copy of instructions followed by delivery supervisors when uploading data to AMS or inputting data that will be accessed by AMS.

¹ Response of Postal Service Witness John Kelley to Interrogatory VP/USPS-T16-10(i) Posed by Valpak Dealer’s Association, Inc., June 3, 2005.