

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 POSTAL SERVICE WITNESS LEWIS  
TO INTERROGATORIES OF DOUGLAS CARLSON (DFC/USPS-T30-1-5)  
(June 15, 2005)

The United States Postal Service hereby provides the response of witness Lewis to the following interrogatories of Douglas Carlson, filed on June 1, 2005: DFC/USPS-T30-1-5.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, Fax -5402  
June 15, 2005

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LEWIS TO  
INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T30-1.** Please refer to your testimony at pages 218 and 219. Please discuss the extent to which letter carriers who deliver mail to customers also collect mail from collection boxes.

**Response**

Local managers have significant discretion in how they establish City carrier assignments. They establish City carrier assignments based upon local operational needs. City carrier assignments may, and often do, include the responsibility to collect mail from collection points in addition to delivering mail to customers. The Postal Service does not maintain statistics showing the extent to which letter carriers who deliver mail to customers also collect mail from collection boxes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LEWIS TO  
INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T30-2.** Please discuss the extent to which the Postal Service uses dedicated collection routes, rather than letter carriers who are also delivering mail to customers, to collect mail from collection boxes.

**Response**

Local managers have significant discretion in how they establish City carrier assignments. They establish City carrier assignments based upon local operational needs. Many field managers establish 'dedicated' collection routes, City carrier assignments that consist solely of collecting mail from collection boxes, to facilitate the management of their local collections process. The Postal Service does not maintain statistics showing the extent to which letter carriers who deliver mail to customers also collect mail from collection boxes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LEWIS TO  
INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T30-3.** To the extent that information is available in the Collection Point Management System database or another database, please identify the percentage of collection boxes for which at least one collection per day is performed by a letter carrier whose duties on that day also include delivery of mail to customers. Please provide a breakdown for residential boxes and business collection boxes (as those boxes are coded in the database).

**Response**

The Postal Service does not maintain statistics showing the extent to which letter carriers who deliver mail to customers also collect mail from collection boxes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LEWIS TO  
INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T30-4.** Please refer to your testimony at page 22, lines 6–14.

- a. In which way is the mail that arrives at the VIM room “unworked”?
- b. Please explain why mail delivered to a VIM room would not be sorted or sequenced by business name, suite number, or apartment number.

**Response**

In using the term "unworked," I meant that the mail dropped at a VIM room still requires preparation prior to delivery. Not all of the mail arrives sorted or sequenced by business name, suite number, or apartment number. Flat or parcel sorting operations, for example, do not generally provide a significant number of separations below carrier route. In addition to separating mail by delivery point or customer, a carrier on a VIM route must consolidate the various types of mail (letters, flats, and packages) destined for each customer.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LEWIS TO  
INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T30-5.** With specific reference to DPS and the arrival times of mail at post offices from P&DC's or other processing facilities, please explain how the Postal Service makes First-Class caller-service mail available earlier than mail destined to actual post-office boxes.

**Response**

The Postal Service can often provide mail to caller service customers earlier than to Post Office Boxes for a number of reasons. Sort plans generally finalize caller service mail at an earlier point in the processing window than they finalize POBox mail.

Customers often pick up caller service mail at the Plant. Therefore, it does not always require transportation to a delivery unit. There is less manual work required to complete the handoff to the caller service customer than there is with POBox mail. POBox mail requires an additional manual sort into the POBox.

## 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.

---

Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, FAX: -5402  
June 15, 2005