

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 BOZZO
TO INTERROGATORIES OF THE OCA (OCA/USPS-T12 -4-6)
(July 1, 2005)

The United States Postal Service hereby provides the responses of witness Bozzo to the following interrogatories of the OCA, filed on June 17, 2005: OCA/USPS-T12-4-6.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 1, 2005

Response of United States Postal Service Witness Bozzo
To Interrogatories of the Office of the Consumer Advocate

OCA/USPS-T12-4. Please explain the assumptions you make about the implicit form of the production function for mail processing plants. Please specify the assumptions you make about the stages of production, the separability of different stages of production, and the inputs and output at each stage.

Response.

I take the production process at the plants to be described by a product transformation implicit function:

$$g(T, L, K; T^*, L^*, K^*; X, X^*)=0$$

where T, L, K, and X are, respectively, vectors of outputs (or “cost drivers”), variable (labor) inputs, quasi-fixed inputs, and other factors affecting the production process (e.g., site-specific factors) for the modeled cost pools.

Asterisks denote the corresponding variables for cost pools outside the scope of my modeling work.

As my analysis is part of an application of the “volume-variability/distribution key” method for computing marginal cost-equivalent volume-variable costs, the vector of mail processing outputs (T, T*) may be considered to be a translation of the vector of volumes (by product) V through the Postal Service’s operating plan.

Note that Postal Service processing operations implement far fewer distinct mail streams than there are rate categories of mail.

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I assume for the modeled operations that the production process is nonjoint such that it is possible to write a production function for cost pool i :

$$T_i = f_i(L_i, K_i, X_i)$$

Please see also Docket No. R2000-1, USPS-T-15 at 42-43.

In specifying TPF (or TPH) for the outputs T_i , I am taking the output of a cost pool to be an index of the aggregate sorting improvements performed within the cost pool—in effect, a “value added” for the cost pool. This implies that labor resources directed to sorting mail in one cost pool do not also improve mail in another cost pool, for instance an employee loading mail at a DBCS does not (indeed cannot) simultaneously sort mail at a manual case.

The outputs T_i are aggregates of handlings in “upstream” operations (e.g., outgoing and incoming primary) and “downstream” operations (secondary and DPS sorts). In actual operations, sorting improvements in the upstream operations certainly must be performed prior to those in the downstream. The cost pool-level production nonjointness described above may extend, by similar logic, to more finely disaggregated operations, such as those underlying the data provided in response to OCA/USPS-T12-3. I have not examined whether imposing additional structure on the technology provides a net improvement of the modeling results.

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Given the scope of my analysis, I have not otherwise considered what the appropriate joint production assumptions might be for the non-modeled cost pools.

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OCA/USPS-T12-5. Please explain the assumptions you make about the cost minimization decision in mail processing plants and how this generates the form of the 14 [sic] labor demand equations that you estimate for the processing operations.

Response.

Given the implicit production functions specified in OCA/USPS-T12-4, cost minimization by the Postal Service would yield labor demands of the general form $L_i = l_i(w_i, T_i, K_i, X_i)$, where w_i is an applicable (relative) wage. However, I do not believe it is necessary, given engineering and other considerations, for the Postal Service to literally be a cost minimizer for the variables implied by cost minimization also to be appropriate explanatory variables in a non-minimizing case. Please see, e.g., USPS-T-12 at 12-16, and Docket No. R2000-1, USPS-T-15 at 32-33 and 44-53.

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OCA/USPS-T12-6. Please refer to the response to PB/USPS-T29-8. Witness McCrery states that “certain zones are only processed up to the 5-digit level in the plant and then dispatched to the delivery unit.”

- a. Please provide a list of plants (by Plant ID) where this occurs.
- b. For plants listed in part a, please provide by quarter the proportion of ZIP Codes that are only sorted to five digits (excluding ZIP Codes that received volume that missed DPS deadlines).
- c. For plants listed in part a, please provide by quarter the proportion of letter-shaped volume that is only sorted to five digits (excluding volume that missed DPS deadlines).
- d. For plants listed in part a, please provide by quarter the proportion of flat-shaped volume that is only sorted to five digits.
- e. Please provide a list of plants (by Plant ID) where certain zones are only processed up to carrier route and then dispatched to the delivery unit.
- f. For plants listed in part e, please provide by quarter the proportion of ZIP Codes that are only sorted to carrier route.
- g. For plants listed in part e, please provide by quarter the proportion of letter-shaped volume that is only sorted to carrier route.

Response.

- a. The table provided as Attachment A to this response provides a list of site IDs that dispatch letter mail at either the 5-digit or carrier route level of sortation, that dispatch flat mail at the 5-digit level of sortation, the number of zones in each case, and the total number of zones served by the site, according to the data currently available from the Postal Service.
- b. The table provided as Attachment A to this response provides the proportions of zones receiving letter- and flat-shaped mail sorted to the 5-digit level, according to the data currently available from the Postal Service. It is my understanding that historical data are not available.
- c. I am not aware of any source for the requested data.
- d. I am not aware of any source for the requested data.
- e. Please see the response to part a.

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- f. The table provided as Attachment A to this response provides the proportions of zones receiving letter-shape mail sorted to the carrier route level, according to the data currently available from the Postal Service. It is my understanding that historical data are not available.
- g. I am not aware of any source for the requested data.

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Attachment A, Response to OCA/USPS-T12-6
5-Digit Zones By Plant Site ID and Dispatch Finalization Levels

Site ID	PLANT LETTER PROCESSING						PLANT FLAT PROCESSING			
	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones	CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
1	88	12	181	281	64%	4%	75	206	281	73%
2	73	7	18	98	18%	7%	80	18	98	18%
3	100	23	106	229	46%	10%	103	126	229	55%
4	98	19	51	168	30%	11%	104	64	168	38%
5	99	14	29	142	20%	10%	107	35	142	25%
6	63	56	128	247	52%	23%	94	153	247	62%
7	116	13	6	135	4%	10%	74	61	135	45%
8	71	7	90	168	54%	4%	78	90	168	54%
9	76	0	87	163	53%	0%	61	102	163	63%
10	83	0	61	144	42%	0%	75	69	144	48%
11	106	0	41	147	28%	0%	106	41	147	28%
12	10	2	2	14	14%	14%	12	2	14	14%
13	61	0	2	63	3%	0%	61	2	63	3%
14	41	1	0	42	0%	2%	42	0	42	0%
15	68	3	18	89	20%	3%	70	19	89	21%
16	41	1	14	56	25%	2%	42	14	56	25%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5- Digit Zones	% CR Zones
20	46	2	19	67	28%	3%
21	116	1	17	134	13%	1%
22	25	0	0	25	0%	0%
23	49	0	6	55	11%	0%
24	75	3	15	93	16%	3%
25	95	13	34	142	24%	9%
26	111	5	44	160	28%	3%
28	41	30	195	266	73%	11%
29	34	24	40	98	41%	24%
30	59	9	15	83	18%	11%
31	21	0	81	102	79%	0%
32	25	24	21	70	30%	34%
35	38	8	45	91	49%	9%
38	41	39	70	150	47%	26%
39	51	11	18	80	23%	14%
42	18	1	56	75	75%	1%
43	36	45	8	89	9%	51%
45	134	56	4	194	2%	29%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
46	21	67	31%
111	23	134	17%
25	0	25	0%
49	6	55	11%
78	15	93	16%
108	34	142	24%
109	51	160	32%
63	203	266	76%
54	44	98	45%
39	44	83	53%
21	81	102	79%
49	21	70	30%
46	45	91	49%
75	75	150	50%
52	28	80	35%
19	56	75	75%
81	8	89	9%
112	82	194	42%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5- Digit Zones	% CR Zones
46	36	5	24	65	37%	8%
47	13	1	0	14	0%	7%
48	61	2	29	92	32%	2%
49	35	14	85	134	63%	10%
50	26	5	18	49	37%	10%
51	53	3	33	89	37%	3%
52	19	13	234	266	88%	5%
53	59	41	33	133	25%	31%
55	38	22	172	232	74%	9%
58	124	33	114	271	42%	12%
59	104	4	23	131	18%	3%
60	69	4	104	177	59%	2%
61	51	22	63	136	46%	16%
62	114	8	59	181	33%	4%
63	57	14	13	84	15%	17%
64	127	12	50	189	26%	6%
65	54	12	75	141	53%	9%
66	119	67	147	333	44%	20%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
41	24	65	37%
14	0	14	0%
53	39	92	42%
49	85	134	63%
30	19	49	39%
56	33	89	37%
25	241	266	91%
87	46	133	35%
58	174	232	75%
136	135	271	50%
77	54	131	41%
53	124	177	70%
62	74	136	54%
101	80	181	44%
51	33	84	39%
138	51	189	27%
60	81	141	57%
142	191	333	57%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
67	69	66	100	235	43%	28%
68	66	34	36	136	26%	25%
69	92	18	77	187	41%	10%
70	105	35	124	264	47%	13%
71	76	26	63	165	38%	16%
72	163	1	151	315	48%	0%
73	125	5	31	161	19%	3%
74	63	22	265	350	76%	6%
75	126	41	48	215	22%	19%
76	25	3	231	259	89%	1%
77	42	11	45	98	46%	11%
78	116	0	32	148	22%	0%
79	76	22	177	275	64%	8%
80	64	1	12	77	16%	1%
81	85	13	41	139	29%	9%
82	119	0	33	152	22%	0%
83	75	1	38	114	33%	1%
84	17	23	94	134	70%	17%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
94	141	235	60%
95	41	136	30%
92	95	187	51%
133	131	264	50%
90	75	165	45%
164	151	315	48%
121	40	161	25%
53	297	350	85%
120	95	215	44%
28	231	259	89%
51	47	98	48%
116	32	148	22%
93	182	275	66%
65	12	77	16%
80	59	139	42%
116	36	152	24%
69	45	114	39%
39	95	134	71%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5- Digit Zones	% CR Zones
85	77	2	25	104	24%	2%
86	15	7	124	146	85%	5%
87	8	8	124	140	89%	6%
88	57	25	44	126	35%	20%
89	18	2	31	51	61%	4%
90	44	9	47	100	47%	9%
91	37	24	11	72	15%	33%
92	17	28	86	131	66%	21%
93	54	32	188	274	69%	12%
94	16	28	16	60	27%	47%
95	41	40	40	121	33%	33%
96	40	20	77	137	56%	15%
97	45	36	19	100	19%	36%
98	60	29	62	151	41%	19%
99	40	10	18	68	26%	15%
100	42	1	26	69	38%	1%
101	18	24	36	78	46%	31%
102	74	6	65	145	45%	4%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
54	50	104	48%
22	124	146	85%
16	124	140	89%
69	57	126	45%
20	31	51	61%
32	68	100	68%
57	15	72	21%
42	89	131	68%
69	205	274	75%
44	16	60	27%
46	75	121	62%
54	83	137	61%
80	20	100	20%
71	80	151	53%
42	26	68	38%
43	26	69	38%
42	36	78	46%
61	84	145	58%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
103	30	9	51	90	57%	10%
104	26	27	104	157	66%	17%
105	21	9	120	150	80%	6%
106	28	15	28	71	39%	21%
107	105	1	26	132	20%	1%
108	110	3	6	119	5%	3%
109	30	21	145	196	74%	11%
110	22	13	36	71	51%	18%
111	54	0	19	73	26%	0%
112	23	26	84	133	63%	20%
113	10	31	13	54	24%	57%
114	65	0	44	109	40%	0%
115	88	32	56	176	32%	18%
116	39	52	65	156	42%	33%
118	33	22	59	114	52%	19%
119	95	4	80	179	45%	2%
120	5	15	43	63	68%	24%
121	10	14	0	24	0%	58%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
33	57	90	63%
52	105	157	67%
23	127	150	85%
37	34	71	48%
106	26	132	20%
111	8	119	7%
33	163	196	83%
32	39	71	55%
52	21	73	29%
40	93	133	70%
40	14	54	26%
65	44	109	40%
85	91	176	52%
83	73	156	47%
55	59	114	52%
77	102	179	57%
20	43	63	68%
24	0	24	0%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
122	64	0	38	102	37%	0%
123	47	3	33	83	40%	4%
125	30	33	11	74	15%	45%
126	13	20	46	79	58%	25%
127	20	29	36	85	42%	34%
129	99	20	63	182	35%	11%
130	31	26	56	113	50%	23%
131	127	77	68	272	25%	28%
132	76	70	32	178	18%	39%
133	89	38	40	167	24%	23%
134	99	47	83	229	36%	21%
135	96	78	7	181	4%	43%
136	122	8	130	260	50%	3%
137	134	43	89	266	33%	16%
138	75	71	68	214	32%	33%
139	147	3	15	165	9%	2%
140	110	67	235	412	57%	16%
141	115	44	71	230	31%	19%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
43	59	102	58%
37	46	83	55%
61	13	74	18%
26	53	79	67%
48	37	85	44%
114	68	182	37%
57	56	113	50%
134	138	272	51%
142	36	178	20%
102	65	167	39%
120	109	229	48%
144	37	181	20%
111	149	260	57%
135	131	266	49%
146	68	214	32%
102	63	165	38%
157	255	412	62%
155	75	230	33%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5- Digit Zones	% CR Zones
142	88	6	10	104	10%	6%
143	102	46	163	311	52%	15%
144	141	0	17	158	11%	0%
145	51	59	147	257	57%	23%
146	30	16	2	48	4%	33%
147	141	0	17	158	11%	0%
148	54	0	7	61	11%	0%
149	79	26	49	154	32%	17%
150	103	6	4	113	4%	5%
151	65	0	1	66	2%	0%
152	74	0	1	75	1%	0%
153	121	11	87	219	40%	5%
154	76	41	46	163	28%	25%
155	163	23	51	237	22%	10%
156	70	2	0	72	0%	3%
157	38	14	62	114	54%	12%
158	81	6	77	164	47%	4%
159	30	10	71	111	64%	9%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
94	10	104	10%
133	178	311	57%
121	37	158	23%
88	169	257	66%
46	2	48	4%
123	35	158	22%
54	7	61	11%
100	54	154	35%
102	11	113	10%
65	1	66	2%
65	10	75	13%
80	139	219	63%
101	62	163	38%
118	119	237	50%
72	0	72	0%
52	62	114	54%
40	124	164	76%
38	73	111	66%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
160	11	15	27	53	51%	28%
161	36	12	36	84	43%	14%
162	23	8	19	50	38%	16%
163	97	0	48	145	33%	0%
164	35	5	3	43	7%	12%
165	35	16	36	87	41%	18%
166	48	18	2	68	3%	26%
167	80	0	9	89	10%	0%
168	18	40	24	82	29%	49%
169	62	20	20	102	20%	20%
170	33	4	4	41	10%	10%
171	84	3	15	102	15%	3%
172	176	2	44	222	20%	1%
173	74	0	30	104	29%	0%
174	31	9	1	41	2%	22%
175	34	4	37	75	49%	5%
176	67	0	1	68	1%	0%
177	45	45	46	136	34%	33%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
26	27	53	51%
45	39	84	46%
31	19	50	38%
68	77	145	53%
40	3	43	7%
48	39	87	45%
61	7	68	10%
80	9	89	10%
51	31	82	38%
65	37	102	36%
37	4	41	10%
83	19	102	19%
147	75	222	34%
59	45	104	43%
28	13	41	32%
38	37	75	49%
67	1	68	1%
71	65	136	48%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
178	23	15	38	76	50%	20%
179	58	12	44	114	39%	11%
180	21	14	32	67	48%	21%
181	59	13	37	109	34%	12%
182	129	33	102	264	39%	13%
183	46	0	8	54	15%	0%
184	49	0	24	73	33%	0%
185	100	6	30	136	22%	4%
186	66	11	85	162	52%	7%
187	43	2	12	57	21%	4%
188	11	42	15	68	22%	62%
190	44	25	66	135	49%	19%
191	17	14	4	35	11%	40%
192	20	11	21	52	40%	21%
193	67	0	25	92	27%	0%
194	50	1	11	62	18%	2%
195	72	5	13	90	14%	6%
196	4	0	1	5	20%	0%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
27	49	76	64%
57	57	114	50%
33	34	67	51%
72	37	109	34%
112	152	264	58%
46	8	54	15%
31	42	73	58%
32	104	136	76%
77	85	162	52%
45	12	57	21%
53	15	68	22%
55	80	135	59%
31	4	35	11%
31	21	52	40%
65	27	92	29%
48	14	62	23%
70	20	90	22%
4	1	5	20%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
198	113	1	26	140	19%	1%
199	162	0	44	206	21%	0%
200	120	0	15	135	11%	0%
201	165	0	51	216	24%	0%
202	185	49	110	344	32%	14%
203	110	39	63	212	30%	18%
204	67	59	26	152	17%	39%
205	106	7	34	147	23%	5%
206	65	8	23	96	24%	8%
207	78	0	0	78	0%	0%
208	49	10	21	80	26%	13%
209	126	1	31	158	20%	1%
210	142	1	4	147	3%	1%
211	99	1	61	161	38%	1%
212	97	0	13	110	12%	0%
213	264	0	54	318	17%	0%
214	138	31	160	329	49%	9%
215	62	109	22	193	11%	56%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
113	27	140	19%
118	88	206	43%
111	24	135	18%
105	111	216	51%
216	128	344	37%
127	85	212	40%
107	45	152	30%
92	55	147	37%
59	37	96	39%
56	22	78	28%
59	21	80	26%
127	31	158	20%
122	25	147	17%
94	67	161	42%
97	13	110	12%
260	58	318	18%
140	189	329	57%
164	29	193	15%

Response of United States Postal Service Witness Bozzo
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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5- Digit Zones	% CR Zones
216	64	0	76	140	54%	0%
217	221	9	117	347	34%	3%
218	48	3	33	84	39%	4%
219	97	0	26	123	21%	0%
220	35	0	14	49	29%	0%
221	27	25	116	168	69%	15%
222	13	11	12	36	33%	31%
223	144	0	26	170	15%	0%
224	91	12	47	150	31%	8%
225	10	2	15	27	56%	7%
226	60	9	88	157	56%	6%
227	56	10	41	107	38%	9%
228	49	0	7	56	13%	0%
229	104	10	42	156	27%	6%
230	64	0	0	64	0%	0%
231	40	4	21	65	32%	6%
232	113	0	17	130	13%	0%
233	26	13	0	39	0%	33%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
36	104	140	74%
165	182	347	52%
51	33	84	39%
97	26	123	21%
35	14	49	29%
39	129	168	77%
24	12	36	33%
126	44	170	26%
75	75	150	50%
12	15	27	56%
69	88	157	56%
66	41	107	38%
49	7	56	13%
78	78	156	50%
55	9	64	14%
44	21	65	32%
113	17	130	13%
39	0	39	0%

Response of United States Postal Service Witness Bozzo
To Interrogatories of the Office of the Consumer Advocate

PLANT LETTER PROCESSING						
Site ID	DPS & Sector Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
234	77	4	20	101	20%	4%
235	23	0	38	61	62%	0%
236	32	0	87	119	73%	0%
237	109	1	3	113	3%	1%
238	109	4	10	123	8%	3%
239	28	13	32	73	44%	18%
240	26	26	7	59	12%	44%
241	71	0	7	78	9%	0%
242	160	2	20	182	11%	1%
243	150	0	7	157	4%	0%
244	132	10	7	149	5%	7%
245	100	27	27	154	18%	18%
246	36	2	46	84	55%	2%
247	49	0	14	63	22%	0%
248	108	0	15	123	12%	0%
249	64	0	4	68	6%	0%
250	58	30	42	130	32%	23%
251	25	0	43	68	63%	0%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
66	35	101	35%
23	38	61	62%
32	87	119	73%
97	16	113	14%
94	29	123	24%
39	34	73	47%
48	11	59	19%
71	7	78	9%
154	28	182	15%
150	7	157	4%
142	7	149	5%
102	52	154	34%
36	48	84	57%
46	17	63	27%
108	15	123	12%
62	6	68	9%
88	42	130	32%
23	45	68	66%

Response of United States Postal Service Witness Bozzo
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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
252	69	0	6	75	8%	0%
253	82	2	18	102	18%	2%
254	75	0	12	87	14%	0%
255	108	0	7	115	6%	0%
256	130	2	75	207	36%	1%
257	99	0	14	113	12%	0%
258	81	0	16	97	16%	0%
259	62	0	10	72	14%	0%
260	61	46	166	273	61%	17%
261	60	10	49	119	41%	8%
262	84	2	74	160	46%	1%
263	114	0	22	136	16%	0%
264	129	0	10	139	7%	0%
265	62	1	8	71	11%	1%
266	53	27	45	125	36%	22%
267	45	13	20	78	26%	17%
268	71	4	18	93	19%	4%
269	88	0	10	98	10%	0%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
68	7	75	9%
77	25	102	25%
75	12	87	14%
108	7	115	6%
94	113	207	55%
99	14	113	12%
80	17	97	18%
62	10	72	14%
88	185	273	68%
70	49	119	41%
72	88	160	55%
111	25	136	18%
106	33	139	24%
63	8	71	11%
79	46	125	37%
54	24	78	31%
75	18	93	19%
88	10	98	10%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
270	117	3	27	147	18%	2%
271	221	23	111	355	31%	6%
272	137	33	60	230	26%	14%
273	119	4	100	223	45%	2%
274	95	10	97	202	48%	5%
276	82	7	31	120	26%	6%
277	99	0	18	117	15%	0%
278	120	0	14	134	10%	0%
279	53	19	153	225	68%	8%
280	60	5	6	71	8%	7%
281	131	20	59	210	28%	10%
282	83	0	3	86	3%	0%
283	101	6	20	127	16%	5%
284	67	9	10	86	12%	10%
285	53	0	20	73	27%	0%
286	55	13	53	121	44%	11%
287	98	4	122	224	54%	2%
288	57	0	2	59	3%	0%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
120	27	147	18%
217	138	355	39%
162	68	230	30%
88	135	223	61%
105	97	202	48%
89	31	120	26%
87	30	117	26%
118	16	134	12%
72	153	225	68%
65	6	71	8%
113	97	210	46%
80	6	86	7%
107	20	127	16%
76	10	86	12%
53	20	73	27%
65	56	121	46%
63	161	224	72%
57	2	59	3%

Response of United States Postal Service Witness Bozzo
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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5- Digit Zones	% CR Zones
289	42	0	116	158	73%	0%
290	56	16	25	97	26%	16%
291	23	0	60	83	72%	0%
292	39	7	64	110	58%	6%
293	135	13	14	162	9%	8%
294	17	9	61	87	70%	10%
295	38	4	35	77	45%	5%
296	45	35	41	121	34%	29%
297	41	41	62	144	43%	28%
298	113	0	42	155	27%	0%
299	40	1	47	88	53%	1%
300	48	6	78	132	59%	5%
301	21	4	52	77	68%	5%
302	35	1	7	43	16%	2%
303	15	21	0	36	0%	58%
304	53	19	59	131	45%	15%
305	36	8	30	74	41%	11%
306	22	3	5	30	17%	10%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
42	116	158	73%
61	36	97	37%
23	60	83	72%
46	64	110	58%
148	14	162	9%
24	63	87	72%
38	39	77	51%
63	58	121	48%
58	86	144	60%
96	59	155	38%
30	58	88	66%
54	78	132	59%
25	52	77	68%
36	7	43	16%
36	0	36	0%
62	69	131	53%
44	30	74	41%
21	9	30	30%

Response of United States Postal Service Witness Bozzo
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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
307	56	3	15	74	20%	4%
308	59	16	58	133	44%	12%
309	52	4	46	102	45%	4%
310	27	0	27	54	50%	0%
311	24	0	25	49	51%	0%
312	24	1	41	66	62%	2%
313	21	6	51	78	65%	8%
314	8	18	0	26	0%	69%
315	17	5	82	104	79%	5%
316	29	14	105	148	71%	9%
317	12	7	61	80	76%	9%
318	8	12	26	46	57%	26%
319	23	0	11	34	32%	0%
322	35	0	1	36	3%	0%
323	51	15	12	78	15%	19%
324	9	12	45	66	68%	18%
325	11	15	28	54	52%	28%
326	29	13	82	124	66%	10%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
59	15	74	20%
59	74	133	56%
43	59	102	58%
27	27	54	50%
24	25	49	51%
24	42	66	64%
26	52	78	67%
26	0	26	0%
22	82	104	79%
43	105	148	71%
19	61	80	76%
20	26	46	57%
23	11	34	32%
35	1	36	3%
55	23	78	29%
21	45	66	68%
26	28	54	52%
42	82	124	66%

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PLANT LETTER PROCESSING						
Site ID	DPS & Sector Segment Zones	CR Zones	5-Digit Zones	TOTAL ZONES	% 5-Digit Zones	% CR Zones
327	31	0	17	48	35%	0%
348	143	19	25	187	13%	10%

PLANT FLAT PROCESSING			
CR ZONES	5 DIGIT ZONES	TOTAL ZONES	% 5 DIGIT ZONES
31	17	48	35%
162	25	187	13%

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

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July 1, 2005