

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 POSTAL SERVICE WITNESS McCRERY  
TO QUESTIONS POSED BY MMA AT THE JULY 6, 2005 HEARINGS  
(July 20, 2005)

The United States Postal Service hereby responds to the above-described questions of Major Mailers Association.

The questions are paraphrased, with citations to the transcript, and are followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF U.S. POSTAL SERVICE WITNESS McCRERY  
TO QUESTION POSED BY MMA AT THE JULY 6, 2005 HEARINGS

**TR 5/1753:** Please provide, if available, the percentage of non-pre-barcoded First-Class letters that the Postal Service successfully barcoded in FY04.

**Response:**

Of all of the non-pre-barcoded letters that the Postal Service attempted to barcode, 89.0 percent were successfully coded to the finest depth in FY 2004. All statistics provided thus far in response to interrogatories asking for USPS barcoding resolution rates, including the response to MMA/USPS-T29-2, have been for all classes.

These statistics are not available for only First-Class Mail. Therefore, the far left column on page three of Cross Examination Exhibit MMA-3, reflects an incorrect assumption by MMA that the percentages provided in the response to MMA/USPS-T29-2 apply to First-Class Mail only. Also, please note that 51.4% represents the percentage of letters fed into the ISS that is successfully read and barcoded without the aid of RCR or REC, and thus is not the percentage of Total Barcoded ISS. Finally, it is important to again note that statistics on page three of Cross Examination Exhibit MMA-3 do not factor in leakage and the fact that pieces can bypass RCR and flow directly to the REC as clarified beginning at Tr. 5/1751, together resulting in the percentage in Column 9 that is too high.

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**Tr. 5/1759.** Referring to Cross Examination Exhibit MMA-3, please explain why the total percentage of non-pre-barcoded letters which are successfully barcoded is 82.2 percent, while the percentage of letters DPSed or otherwise automated is 87.2 percent.

**Response:**

The two numbers represent two different and distinct statistics. "82.2 percent" represents the percentage out of all non-pre barcoded letters to which the Postal Service applied a barcode to the finest depth of code.<sup>1</sup> "87.2 percent" represents the percentage out of all letters on which the Postal Service performs incoming secondary distribution on automation. Additionally, the volume on which incoming secondary distribution is performed manually includes both non-barcoded letters as well as barcoded letters for manual zones.

As noted in response to MMA/USPS-T29-8 and again at Tr. 5/1756, the figures in Columns 4, 8, and 9 on page one of Cross Examination Exhibit MMA-3 cannot be accurately calculated using the class-specific statistics provided in the response to MMA/USPS-T29-8 due to the differences in how the total and class-specific figures are derived.

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<sup>1</sup> Please note that this is different from the "89.0 percent" figure provided in response provided to the question asked TR 5/1753. "89.0 percent" is the percentage successfully coded out of just the letters the Postal Service attempted to barcode.

## 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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