

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF VALPAK. (VP/USPS-T14-2 – 4, 6-7),  
REDIRECTED FROM WITNESS BRADLEY (USPS-T-14)  
(June 6, 2006)

The United States Postal Service hereby provides its response to the following interrogatories of ValPak, Inc., filed on May 23, 2006: VP/USPS-T14-2-4, 6-7, redirected from witness Bradley (USPS-T-14).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 6, 2006

**Response of the United States Postal Service to Interrogatories of Valpak,  
Redirected from Witness Bradley (USPS-T14)**

**VP/USPS-T14-2**

For your answer to this question, please assume that: (i) a city delivery route included in the most recent City Carrier Cost System (“CCCS”) survey had 500 residential addresses; (ii) on some particular day, the mail for delivery had 500 flat host pieces and 500 DALs; and (iii) the carrier elected to take both the flats and DALs directly to the street as two extra bundles of sequenced mail (i.e., the DALs were not cased).

- a. In the CCCS, under the above-described circumstances, should the volume of sequenced mail taken directly to the street have been recorded as 1,000 pieces, or as 500 pieces?
- b. Did those recording volume in the CCCS receive any explicit instruction with respect to how mail volume should be recorded when both DALs and their host pieces were taken directly to the street as extra bundles? If so, please describe the instructions given. If not, please explain why not, and whether this failure to be explicit with respect to the way that DALs were counted could create ambiguity in the volume data recorded for sequenced mail.

**RESPONSE:**

- a. If the question refers to the City Carrier Street Time Survey (CCSTS), the volume recorded is 1,000 pieces.
- b. Yes. The local study coordinators were instructed to record piece counts for each of the mail categories using end of run reports, machine counts, and/or manifests wherever possible. For letters or flats that required casing that did not have an accompanying machine count or manifest, coordinators were instructed to employ conversion factors. Therefore, if a DAL was cased, it was included in the cased letter count and the host piece was included in the sequenced mail count. If neither piece was cased, then both the DAL and the host piece counts were included in the sequenced mail count.

**Response of the United States Postal Service to Interrogatories of Valpak,  
Redirected from Witness Bradley (USPS-T14)**

**VP/USPS-T14-3**

- a. For city routes included in the CCCS survey, was the volume of mail for delivery counted (i) before any mail was cased, or (ii) after all mail was ready to be taken to the street? Please explain your answer.
- b. If mail volume was counted before any mail was cased, and if, on some particular day, carriers had a mailing of saturation flats for delivery that included DALs, were the DALs (i) recorded as cased pieces, (ii) recorded as sequenced pieces, or (iii) not recorded at all? Inasmuch as DALs sometimes are cased and sometimes are taken directly to the street as an extra bundle (i.e., as sequenced mail), please indicate how the person recording the volume was able to determine whether to record the DALs as either cased or sequenced mail before the carrier decided which procedure to employ on that day.
- c. For pieces that are cased in a vertical flats case, when are they counted — after casing, or before casing? If counting occurs prior to casing, is mail measured by linear feet and converted to pieces, or is each piece counted separately?
- d. (i) How is the volume of DPS'd mail counted in the CCCS?  
(ii) Is each post card and DAL (if DPS'd) counted as a separate piece?

**RESPONSE:**

- a. If the question refers to the City Carrier Street Time Survey (CCSTS), the delivered mail counts typically were made before casing.
- b. CCSTS utilized delivery supervisors or postmasters from the selected facilities as study coordinators specifically to address this type of issue. During the course of their normal responsibilities, the delivery supervisors must shift mail from routes with heavy volumes to routes with low volume, defer mail when appropriate, and determine when and if overtime is necessary to handle the day's work load. This process occurs before casing at the beginning of the shift. In their dual role as study coordinator, they would also record the mail counts. If additional mail would come in after the initial allocation had occurred, before the additional mail is cased, the delivery supervisor/study coordinator would allocate and record those

**Response of the United States Postal Service to Interrogatories of Valpak,  
Redirected from Witness Bradley (USPS-T14)**

volumes into the appropriate route both for operational purposes and as required by the CCSTS.

c. Please see the response to VP/USPS-T14-2 b, redirected to the United States Postal Service. Counting occurs before casing using machine counts and manifests, where available, and conversion factors from linear feet, if not.

d. (i.) Machine counts from end of run reports are used for DPS volumes. (ii.) Yes.

**Response of the United States Postal Service to Interrogatories of Valpak,  
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**VP/USPS-T14-4**

Please confirm that during the period when data for the CCCS were gathered, it was common practice for city carriers in those DDU's that participated in the CCCS to "pivot" when (i) some carriers had significantly more mail than they could sort and deliver within 8 hours, and (ii) other carriers in the same delivery unit could sort and deliver the mail for their routes in less than 8 hours. (See Docket No. R2005-1, response of Postal Service witness Stevens to POIR No. 6, Question 4(c)-(d).) If you do not confirm, please explain fully how mail was delivered on those routes where carriers had significantly more mail than they could sort and deliver within 8 hours.

**RESPONSE:**

It depends on whether by "common practice" you mean one among several approaches commonly used, or the automatic default approach commonly used. Although pivoting is commonplace in all postal DDU's, it is not the only technique available to postal managers. Overtime and mail deferment are also used.

**Response of the United States Postal Service to Interrogatories of Valpak,  
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**VP/USPS-T14-6.**

For your response to this question, please assume that the carrier for route A returns to the DDU early, then pivots to deliver mail on a portion of route B, and follows the instructions described in the response to POIR No. 6, Question 4(d) in Docket No. R2005-1. Please assume also that carriers A and B are included in the CCCS survey.

- a. Please confirm that, when scanners for the carriers on routes A and B are uploaded at the end of the day, there will be two entries for time spent on route B. If you do not confirm, please explain.
- b. Assuming that the response to preceding part a is positive, please explain whether the two entries for time on route B are summed so as to result in a single entry for the time spent delivering mail that day on route B, or whether they appeared as separate entries in the data base supplied by the Postal Service.

**RESPONSE:**

- a. Confirmed
- b. The data for each scan pair representing time for a distinct carrier activity are grouped with like pairs and aggregated first at the route level, and ultimately (for purposes of estimating the regressions) at the ZIP level.

**Response of the United States Postal Service to Interrogatories of Valpak,  
Redirected from Witness Bradley (USPS-T14)**

**VP/USPS-T14-7**

- a. Were the carriers in the DDUs and ZIP codes which were included in the CCCS given any special instructions with respect to overtime and pivoting?
- b. If some carriers had significantly more mail than they could deliver within their allotted 8 hours, were they (i) authorized and instructed to use overtime, and (ii) instructed not to pivot, or divert some of their mail to other carriers with undertime? Please explain. If not, and if pivoting was a practice commonly used during the period of the CCCS survey, please so state.
- c. (i) If a carrier could complete delivery of the route with only 15 to 20 minutes of overtime, would pivoting be a practical alternative?  
(ii) Assuming that some carriers in a delivery unit have undertime, please explain in detail when pivoting is a practical alternative to overtime.

**RESPONSE:**

- a. No. To the degree that carriers were given any instruction with respect to overtime and pivoting, that would be part of regular management practice, not part of the instructions for the City Carrier Street Time Survey (CCSTS).
- b. No, not as part of the City Carrier Street Time Survey (CCSTS). The managers and carriers were explicitly instructed to follow their established operational procedures and not modify their actions because of the survey. Thus any decisions that were made to pivot, use overtime, or divert mail were at the discretion of the local managers and were consistent with their directives and service requirements.
- c. (i.) and (ii.) The CCSTS did not track, nor was it concerned with undertime, overtime, or the use of pivoting to level work load.

## 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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June 6, 2005