

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO VARIOUS INTERROGATORIES
(OCA/USPS-T4-27 & 28; ABP/USPS-T4-20
AND DMA/USPS-T14-60 REDIRECTED FROM WITNESS BRADLEY)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories: OCA/USPS-T4-27 & 28, filed on September 22, 1997; ABP/USPS-T4-20, filed on September 25; and DMA/USPS-T14-60, filed on September 22, and redirected from witness Bradley.

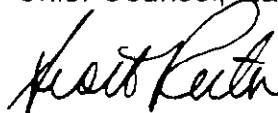
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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October 6, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS MODEN TO THE INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T4-27. This interrogatory follows up on your response to interrogatory DMA/USPS-T4-42b, in particular, to your statement: “[M]ail with a window of requested in-home dates may be curtailed consecutive days.”

- a. Is it plausible to expect that some Postal Service costs are higher when mail is curtailed for the benefit of the mailer (so that mail delivery can be timed for a particular “window”), e.g., storage or space-related costs? Please explain.
- b. Is it possible that such curtailment (i.e., for the benefit of the mailer), can even add to labor costs? Please explain.

Response:

- a. No. I am not aware of any additional costs to the Postal Service as a result of mail being curtailed for the benefit of the mailer. For instance, there are no storage or space-related costs since the mail is staged within the existing floor space in postal facilities.
- b. No. Curtailment, whether it is for the benefit of the mailer or the Postal Service, provides managers with flexibility to level the workload and plan accordingly.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS MODEN TO
THE INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T4-28. Does the Postal Service ever "curtail" delivery of First-Class Mail at the request of the mailer?

- a. If so, under what circumstances? Please relate anecdotal descriptions of instances in which First-Class mailers have requested or might wish to request curtailment so that a delivery window can be met.
- b. If not, why not?
- c. What is the Postal Service's policy when a request for curtailment by a First-Class mailer is submitted? If any documentation of such a policy exists, please provide it.
- d. For purposes of comparison, what is the Postal Service's policy when a request for curtailment by a Standard A mailer is submitted? If any documentation of this policy exists, please provide it.

Response:

Yes.

- a. Generally, mailers of First Class mail do not request curtailment of their mail. An anecdotal scenario in which First Class mail may be "curtailed" is when government issued checks (e.g., Social Security checks) sometimes arrive early to delivery units, so the mail is held for delivery until the appropriate day.
- b. Not applicable.
- c. As I mentioned in 28(a), mailers of First Class mail generally do not request curtailment of their mail. Accordingly, I am not aware of a national policy regarding the handling of a request for curtailment by a First Class mailer.
- d. See 28(c) regarding a policy on First Class mail. See section 472 in the Postal Operations Manual (POM 7) for the policy on accommodating a mailer's requested in-home dates window for Standard (A) mail.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF AMERICAN BUSINESS PRESS

ABP/USPS-T4- 20

As a follow-up to your response to ABP/USPS-T26-6(b), redirected from witness Seckar, do you agree that the deployment of the FSM 1000 deployed with a barcode reader could reduce the makeup differences between flats that are now automated and flats that are now not automated but would be automated and machinable because of deployment of the FSM 1000? Please explain an affirmative or a negative answer.

Response:

It is difficult to say whether equipping the FSM 1000 with a barcode reader could reduce the makeup differences between flats that are now automated and flats that are now not automated. As I mentioned at page 13, lines 1 through 4, of my testimony, we will be looking at the current makeup differences between barcoded and non-barcoded mail. While I cannot anticipate what changes may result, it might be that the preparation requirements for automated and non-automated flats are made more similar. However, assuming that those preparation changes could happen in advance of any future deployment of a barcode reader on the FSM 1000, then the presence or absence of a barcode reader on the FSM 1000 may have minimal impact on makeup differences.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE DMA
REDIRECTED FROM WITNESS BRADLEY**

DMA/USPS-T14-60. Please refer to your response to OCA/USPS-T4-10 where you state that "[i]t is my understanding that the MODS data are widely used by local, regional, and national management." Please fully describe all such uses by local, regional, and national management.

Response:

See Section B, "Use of MODS Data", on pages 16 and 17 of my testimony.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 10/3/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", written above a horizontal line.

Scott L. Reiter

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