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

POSTAL RATE AND FEE CHANGES	Docket No. R2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BOZZO
(USPS-T-46) TO INTERROGATORIES OF UNITED PARCEL SERVICE:
UPS/USPS-T46-1 and 2**
(July 25, 2006)

The United States Postal Service hereby provides the responses of witness
Bozzo (USPS-T-46) to the above-referenced interrogatories, filed on July 11, 2006.
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

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Frank R. Heselton
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–5204; Fax –6187
July 25, 2006

UPS/USPS-T46-1. Refer to USPS-T46, page 28, Table 4. Provide a
complete description of the criteria you used in preparing this table to classify
tallies as "Direct Tallies," "Mixed Tallies," "Mixed Container Tallies," and "Not-
Handling Tallies," including references to specific IOCS questions.

Response.

The criteria are derived from tally categories defined in witness Van-Ty-Smith's

SAS code implementing the mail processing distribution keys. "Direct" tallies are

those tallies in the DIRECT tally sets, as assigned in programs MOD1DIR,

BMC1, and NONMOD1, in USPS-LR-L-55. "Not-handling" tallies are the tallies

assigned in those programs to, respectively, the OUT1.NOTHAND,

OUT4.NOTHAND, and OUT2.NOTHAND tally sets. The remaining tallies are

"mixed" tallies (i.e., the MIXED sets). Mixed container tallies are those assigned

to the COUNTED and PARTIAL sets in the MAPITEMC module, also in USPS-

LR-L-55. Full details on the specific IOCS questions are provided in the

referenced SAS code.

UPS/USPS-T46-2. Refer to USPS-T46, page 29, where you state that
"[t]he automatic prompting for mailpiece selection in several branches of the
redesigned IOCS-CODES software appears to account for much of the direct
tally increase in mail processing." Describe completely any differences in the
nature or extent of the automatic prompting referred to in this passage depending
upon whether the sampled employee is working with the letter, flat or
parcel/bundle mailstream.

Response.

The mailpiece selection rule in question applies when the employee is not

handling a mailpiece at the time of the reading. The automatic prompting occurs

for tallies where letter or flat sorting equipment is indicated as being used

(Q18C1 responses A-B, Q18C1.BMC response A) and mail is present in the

operation. Automatic prompting is not implemented for other types of equipment.

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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Frank R. Heselton

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