

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOZZO,
USPS-T-12, TO INTERROGATORY OF AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS: ABA-NAPM/USPS-T22-6,
REDIRECTED FROM WITNESS ABDIRAHMAN, USPS-T-22
(July 28, 2006)**

The United States Postal Service hereby provides the response of witness Bozzo (USPS-T-12) to the above-referenced interrogatory filed on July 14, 2006, and redirected from witness Abdirahman (USPS-T-22).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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July 28, 2006

Response of United States Postal Service Witness A. Thomas Bozzo
(USPS-T-12)
To Interrogatory of American Bankers Association and National Association of
Presort Mailers
Redirected from Witness Abdirahman (USPS-T-22)

ABA-NAPM/USPS-T22-6. The testimony of USPS witness McCrery reports the following letter mail throughputs of automation machinery:

MLOCR 29,000 pieces per hour

BDCS (sic) 37,000 pieces per hour

DIOSS 37,000 pieces per hour (approximate)

Yet each of your mail flow models, in column 2, reports pieces per hour that are substantially lower. Indeed, 14,830 (Auto 3 pass DPS under incoming sort) is the highest reported.

(a) Please fully explain what factors cause the rated machine capacities to exceed the operational figures contained in your mail flow models, e.g., machine down-time due to changing sort schemes, jams, etc.

(b) Please quantify the relative contribution of each such factor in causing the modeled productivities to fall below the throughput reported by Mr. McCrery.

Response.

(a) The throughputs reported by witness McCrery represent the rate at which machines process the mail while running. The productivities represent the number of pieces processed per workhour in the associated MODS operations. Thus, three main factors account for the difference. First, as witness McCrery notes in USPS-T-42, most machines (including the MLOCR and DBCS/DIOSS; notable exceptions are the AFCS and CSBCS) normally are staffed with two or more employees. Second, while runtime is the largest component of automated sorting operations, there is also substantial time involved in scheme changes, “quasi-allied labor,” overhead activities, and miscellaneous other activities peripheral to the sorting operation. See USPS-T-12 at 26-32. Last, as a practical matter, factors such as machine jams and irregularities in mailflows to specific operations will limit the ability to achieve machines’ nominal throughputs.

Response of United States Postal Service Witness A. Thomas Bozzo
(USPS-T-12)

To Interrogatory of American Bankers Association and National Association of
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(b) MODS data do not indicate actual throughput levels. For an indication of the relative time spent in runtime and other activities, please see USPS-T-12, Table 2 (p. 27). As noted in the response to part a, witness McCrery describes staffing levels for various machine types in USPS-T-42.

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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