

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY  
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO  
(APWU/USPS-T42-22)  
(September 6, 2006)

The United States Postal Service hereby provides the response of witness  
McCrery to the above-listed interrogatory of the APWU, filed on August 23, 2006.

The 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

---

Sheela A. Portonovo

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3012, FAX -6187

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
MARC D. McCRERY TO INTERROGATORY OF  
AMERICAN POSTAL WORKERS UNION, AFL-CIO

**APWU/USPS-T42-22** In response to a discussion about the 19,300 zip codes for which no delivery point sequencing is done, you were asked if a list of those zip codes is available. You indicated those would be listed in the Postal Service's City/State Product (see transcript Volume 11 at 3303-3304). A call to customer service at Address Information Service (the only reference to a City/State Product that we were able to find) did not provide the needed list of zip codes nor clear information about how to get this zip code list. In fact, customer service asked us to please define what we meant by delivery point sequencing. The documentation on the web of the City/State Product also does not mention such a list nor does it clearly define an indicator within the datasets that could be used to generate such a list.

- a) We would request that the Postal Service please provide us with a list of zip codes where delivery point sequencing is not performed, preferably in either an electronic worksheet format or an ascii format.
- b) Please confirm that any zip code not on this list could be assumed to be delivery point sequenced.

**Response:**

There is delivery point sequence (DPS) information within the Address Information Systems (AIS) City State Product, but the information needs to be inferred from other indicators. There is no information specifically defined as "DPS ZIP Codes" in the product, a point that could have been clarified during cross examination. Due to this fact, it is understandable that the customer service representative was uncertain as to the specific request.

- a) USPS-LR-L-177 provides a list of ZIP Codes which are not finalized within a DPS sort plan using either a DBCS or a CSBCS. However, please refer to the answer to APWU/USPS-T42-6 for more information.
- b) It can be confirmed that any ZIP Code not on this list could be assumed to be finalized on a DPS sort plan on a DBCS or CSBCS.