

ORIGINAL

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

UNITED STATES POSTAL SERVICE FOLLOW-UP  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
MAGAZINE PUBLISHERS OF AMERICA WITNESS COHEN  
(USPS/MPA-T2-20-23)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Magazine Publishers of America witness Cohen: USPS/MPA-T2-20-23.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

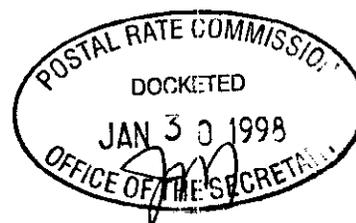
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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January 30, 1998



POSTAL SERVICE FOLLOW-UP INTERROGATORIES TO MPA WITNESS  
COHEN

USPS/MPA-T2-20. Please refer to your response to USPS/MPA-T2-2, and to spreadsheet USPS2b.xls, MPA-LR-3. In your response, you state that “40 percent... of eligible item costs [were] counted.” Spreadsheet USPS2b.xls, from which the 40 percent figure is derived, identifies \$60.364 million in “counted” item costs and \$91.381 million in “uncounted” item costs.

- (a) Please confirm that the \$91.381 million in uncounted item costs reported in spreadsheet USPS2b.xls includes \$34.57 million in costs for “uncounted” items not subject to counting, i.e., bundles, letter trays, and flat trays. If you do not confirm, please provide the figure(s) you believe to be correct. Also please provide the derivation of any such figure(s) in electronic spreadsheet format.
- (b) Please confirm that excluding the \$34.57 million in costs for “uncounted” not subject to counting yields 52 percent as the percentage of eligible item costs counted according to spreadsheet USPS2b.xls. If you do not confirm, please provide the figure(s) you believe to be correct. Also please provide the derivation of any such figure(s) in electronic spreadsheet format.
- (c) Please confirm that both the 40 and 52 percent figures exclude the costs for items eligible for counting that were determined to contain identical mail. If you do not confirm, please explain.
- (d) Please provide total direct (identical plus counted) costs for each item

type eligible for counting and cost pool, in an electronic spreadsheet format comparable to spreadsheet USPS2b.xls.

USPS/MPA-T2-21. Please refer to your response to USPS/MPA-T2-9. By “strict association,” do you mean that 100% of the mail inside a given sack type would have to be of a single subclass? Please explain.

USPS/MPA-T2-22. Please refer to your responses to USPS/MPA-T2-9 and USPS/MPA-T2-10.

- (a) *Do you believe that an IOCS data collector can determine whether a sack contains identical mail or non-identical mail without opening the sack? Please explain.*
- (b) *Are the reasons you give that the contents of mixed sacks may be different from the contents of identical sacks necessarily applicable to uncounted sacks, for which it is not known whether the contents are identical or non-identical mail?*
- (c) *For items subject to the Top Piece Rule, is there any reason why an observation of a mailer-prepared item should be more likely to result in a direct tally than a Postal Service-prepared item? Please explain fully.*

USPS/MPA-T2-23. Please refer to your response to USPS/MPA-T2-12 part b, and to the table provided as Attachment 1 to this interrogatory.

- (a) Please confirm that the table provides as Attachment 1 to this

interrogatory shows a breakdown of the tally counts from spreadsheet DMA17.xls, USPS-LR-H-305, by the IOCS question 19 response. If you do not confirm, please provide the breakdown you believe to be correct.

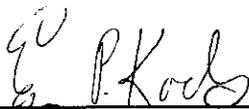
- (b) *Please confirm that the breakdown of tallies by the question 19 response indicates that there are letter tallies for employees whose sampled activity is FSM operations, and flat tallies for employees whose sampled activity is LSM operations. If you do not confirm, please explain.*
- (c) *Please confirm that the observation of letter-shape pieces at FSMs, and of flat-shape pieces at LSMs, need not indicate that employees “are not... clocked into the operation they are actually performing.” If you do not confirm, please explain how such “misclocking” would affect the mix of mail observed in the employee’s sampled activity from question 19.*

**Attachment 1**  
**FY96 IOCS Clerk/Mailhandler Tallies by IOCS Q19 Response and Shape**  
**All Offices**

| Q19 Response | Title                    | Tally Count |        |       |         |          | Total   |
|--------------|--------------------------|-------------|--------|-------|---------|----------|---------|
|              |                          | Letters/Cds | Flats  | IPPs  | Parcels | No Shape |         |
| A            | Manual                   |             |        |       |         |          |         |
| F9211        | A - Letter Case Distrib  | 21,395      | 422    | 57    | 24      | 11,197   | 33,095  |
| F9211        | B - Flat Case Distrib    | 116         | 8,601  | 54    | 133     | 4,884    | 13,788  |
| F9211        | C - Parcel Piece Distrib | 63          | 412    | 517   | 2,090   | 3,418    | 6,500   |
| F9211        | D - Coll/Cancel MM Prep  | 398         | 118    | 27    | 29      | 809      | 1,381   |
| F9211        | E - Presort Mail Units   | 294         | 112    | 6     | 10      | 569      | 991     |
| F9211        | F - Opening Units        | 1,167       | 939    | 192   | 278     | 4,262    | 6,838   |
| F9211        | G - Pouch/Rack Units     | 609         | 1,126  | 569   | 776     | 4,702    | 7,782   |
| F9211        | H - Platform Units       | 407         | 450    | 67    | 232     | 5,744    | 6,900   |
| F9211        | I - Other Manual         | 2,802       | 1,432  | 215   | 582     | 11,526   | 16,557  |
|              | Total Manual             | 27,251      | 13,612 | 1,704 | 4,154   | 47,111   | 93,832  |
| B            | OCR                      | 2,596       | 16     | 0     | 1       | 2,592    | 5,205   |
| C            | Mail Proc BCR/BCS        | 3,527       | 28     | 5     | 4       | 3,409    | 6,973   |
| D            | Delivery BCR/BCS         | 2,688       | 6      | 0     | 0       | 2,155    | 4,849   |
| E            | Carrier Sequence BCS     | 421         | 4      | 0     | 0       | 404      | 829     |
| F            | MPLSM/SPLSM              | 8,217       | 135    | 8     | 0       | 3,594    | 11,954  |
| G            | Letter Facer/Canceler    | 803         | 23     | 2     | 2       | 732      | 1,562   |
| H            | Flat Facer/Canceler      | 32          | 259    | 0     | 5       | 261      | 557     |
| I            | Sack Sorting Machine     | 155         | 251    | 42    | 161     | 1,356    | 1,965   |
| J            | Parcel Sorting Machine   | 28          | 177    | 305   | 1,269   | 1,992    | 3,771   |
| K            | Flat Sorting Machine     | 82          | 6,020  | 20    | 31      | 4,302    | 10,455  |
| L            | Small Parcel & Bundle    | 405         | 965    | 441   | 462     | 3,460    | 5,733   |
| M            | NMO Machine              | 31          | 16     | 4     | 87      | 222      | 360     |
| N            | Multislide               | 70          | 107    | 27    | 121     | 857      | 1,182   |
| P            | ACDCS                    | 88          | 45     | 25    | 106     | 1,198    | 1,462   |
| Q            | Central Banding          | 171         | 50     | 2     | 7       | 552      | 782     |
| R            | Culling Machine          | 153         | 61     | 10    | 13      | 346      | 583     |
| S            | Remote Barcoding Mach    | 16          | 6      | 2     | 10      | 149      | 183     |
| T            | Transport Equipment      | 79          | 189    | 22    | 68      | 6,583    | 6,941   |
| U            | All Other                | 461         | 353    | 91    | 312     | 5,806    | 7,023   |
|              | Blank                    | 3,266       | 1,525  | 126   | 338     | 29,414   | 34,669  |
| Grand Total  |                          | 50,540      | 23,848 | 2,836 | 7,151   | 116,495  | 200,870 |

## 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.

  
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Eric P. Koetting

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January 30, 1998