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



Postal Rate and Fee Changes, 1997 ) Docket No. R97-1

CORRECTION TO ANSWER OF THE
ASSOCIATION OF ALTERNATE POSTAL SYSTEMS
TO INTERROGATORY OF UNITED STATES POSTAL SERVICE TO
WITNESS KENNETH L. BRADSTREET (USPS/AAPS-T1-18)
(February 4, 1998)

The response to interrogatory USPS/AAPS-T1-18 filed on January 27 by the Association of Alternate Postal Systems had misplaced paragraphs. The corrected response is attached hereto.

Respectfully submitted,

Bonnie S. Blair

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

February 4, 1998

Bonnie S. Blair
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ANSWERS OF AAPS WITNESS KENNETH L. BRADSTREET
TO INTERROGATORIES USPS/AAPS-T1-1-18

(corrected February 4, 1998)

USPS/AAPS-T1-18. Please refer to the discussion of city carrier street time costs on page 37 of your testimony. Most of the discussion centers around what the Postal Service calls a park and loop route.

a. Are you assuming that the standard operating procedure for a park and loop route is to carry all of the mail for a route in one circuit without returning to the vehicle? Please explain fully, describing any assumptions you employ.

b. Please discuss how the hypothetical situation described at page 37 lines 7 -21 would change if the normal park and loop route consisted of 10 separate circuits, with the carrier returning to the vehicle before each circuit.

c. Please describe how your analysis of the effect of weight on the cost of delivery would be different for mounted routes (routes where the carrier makes each delivery form her vehicle).

d. What percentage of deliveries by the members of your association are made by carriers on foot? What percentage are made from a vehicle?

Answer:
(a) No. Note that I referred to "extra" trips to the vehicle. My assumptions are that the Postal Service has designed routes efficiently, and that the established parks and loops accommodate normal mail volume while allowing for some residual capacity. I assume that some loops are established based upon volume and some are established based upon the unique geography involved. I assume that there are some light-weight pieces of saturation mail which could be absorbed within that residual capacity for most loops, some heavier pieces which could be absorbed within fewer loops, and some very heavy pieces which would require substantial alterations of the route on a given delivery. For instance, how would a carrier accommodate a 12 ounce publication with inserts, or a 15 ounce telephone directory in addition to his normal load? Certainly this would require modifying a number of loops from the normal delivery pattern.

(b) The hypothetical situation to which you refer assumes a postal street carrier route of 600 addresses, and compares the delivery of a ¼ ounce saturation piece with the delivery of a 3.3 ounce saturation piece, both of which are charged the same postal rate. Using your assumption of 10 separate circuits, the carrier would average 60 deliveries for each circuit. Carrying an extra saturation piece weighing .25 ounces would add an average of 15 ounces to each circuit, some more or less. If each circuit had the residual capacity available, it would require no additional trips back to the vehicle. Compare this to the same carrier delivering a 3.3 ounce saturation piece. In this instance, the carrier must add an average 12+ pounds for each circuit, more or less based upon the actual number of stops on each circuit. This would require one extra trip back to the vehicle for each circuit which did not have the residual capacity to absorb this extra 12+ pounds. Now lets consider the carrier above who has the 12 ounce publication with inserts, and which the publisher has been assured a certain day of

delivery – a situation which happens all the time. The carrier has to absorb an average additional 45 pounds on each established circuit, more than the total capacity of the carrier if he had no other mail to deliver. With the other mail considered, the carrier would have at least one additional trip for each circuit, and in some instances two additional trips. How much extra time would an extra 15 trips take? In the case of the 15 ounce telephone directory, the carrier would be adding an average 56+ pounds for each circuit, probably close to 20 additional trips.

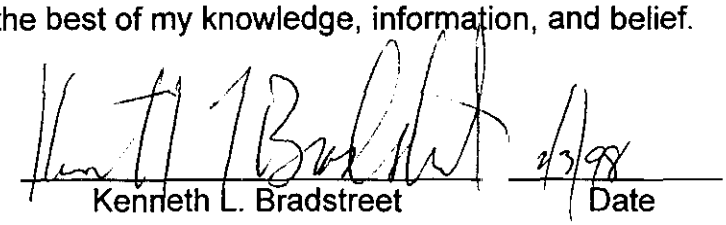
Operating within this hypothetical route, it is possible to ascertain a cost difference for these pieces. Assuming that the 3.3-ounce pieces can be accommodated within the residual capacity in eight out of the ten circuits, this would cause two extra trips. Assuming 15 extra trips for the 12-ounce piece, there is a difference of 13 trips, each consuming between five and ten minutes of time. Assuming conservatively an average of seven minutes per additional trip, we have 91 extra minutes which are entirely weight related. At $40 per labor hour, we have an added cost of $60, or 10 cents per peice. The difference in weight between the two pieces being 8.7 ounces, this calculates into a direct weight-related cost of 18.4 additional cents per pound, an additional weight-driven cost, the existence of which the Postal Service refuses to admit.

(c) Certainly a mounted route would experience some effect for heavier pieces, though probably not to the same extent as the foot carrier. My own experience in delivering routes from a vehicle is that adding weight does add a considerable amount of time. If a delivery set weighs 3 ounces or less, the pieces can be put in bundles of 100 pieces. The carrier delivering to 600 addresses would have to stop and replenish his supply 6 times. However, a delivery set weighing 10 ounces would likely be tied in no more than 25 per bundle. This requires the driver to make 24 stops to replenish his supply. I assume that a mounted postal carrier experiences some of the same problems in blending into his normal mail volume saturation pieces of varying weights.

(d) Based upon our 1997 directory, I have estimated that 89% are delivered on foot, and 11% are delivered from a vehicle.

DECLARATION

I, Kenneth L. Bradstreet, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.



Kenneth L. Bradstreet 2/3/98 Date