

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SMITH
TO PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-T9-1 THROUGH 2**
(January 4, 2012)

United States Postal Service witness Marc Smith (USPS-T-9) provides responses to the above-listed interrogatories of the Public Representative dated December 21, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T-9-1

Please refer to page 15 of your testimony, which states that witness Rosenberg says “there will be a reduced need for Biohazard Detection System cartridges.” Please provide the source for this statement.

RESPONSE:

Witness Rosenberg, USPS-T-3, provided the following information, summarized in the table below, and also provided in the attached Excel spreadsheet “Response to PR-USPS-T9-1.xls”. The “current” number of Advanced Facer Cancellor Systems (AFCS), as of October 2011, is 946. This is the number of AFCS in use in the third week of October. Their deployment at 224 plants requires 520 Biohazard Detection Systems (BDS), each of which requires cartridges for operation. A BDS is required for every two AFCS, so the number of BDS equals the number of AFCS divided by two. In cases where a plant has an odd number of AFCS, however, the number of BDS required is the same calculation, except it needs to be rounded up to be a whole number. So a plant with 10 AFCS needs 5 BDS, while a plant with 11 AFCS needs 6 BDS. The table below shows that the current deployment of the 946 AFCS requires 520 BDS. The calculation is: $85 \times 1 + 56 \times 2 + 40 \times 3 + 26 \times 4 + 10 \times 5 + 3 \times 6 + 2 \times 7 + 1 \times 8 + 1 \times 9$, which is to say there is (24 + 61=) 85 plants with 1 BDS each, (26+30=) 56 plants with 2 BDS each, and so on, totaling 520.

Witness Rosenberg also provided her determination of the AFCS required for the proposed network. Using the same method described above, 617 AFCS at 121 plants require 335 BDS.

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Calculation of the Number of BDS Cartridges for Current vs. Proposed AFCS

		Number of Plants By AFCS/BDS Counts	
Number of AFCS	Number of BDS	Current* (October, 2011)	Proposed**
1	1	24	10
2	1	61	24
3	2	26	13
4	2	30	13
5	3	21	9
6	3	19	17
7	4	14	9
8	4	12	6
9	5	5	7
10	5	5	7
11	6	2	2
12	6	1	1
13	7	0	1
14	7	2	0
15	8	1	2
16	8	0	0
17	9	1	0
Total Plants with AFCS		224	121
Total AFCS		946	617
Total BDS		520	335

*End of Run (EOR)

**USPS-LR-N2012-1/37

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TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T-9-2

Please provide electronic, machine-readable copies of Tables 9, 10, and 11 in your testimony that have links to Library References submitted either in this case, or the FY 2010 ACR. If other data sources were used, provide an electronic copy of the spreadsheets used, with links, and identify the source of data contained in other worksheets.

RESPONSE:

The requested information has been provided in USPS-LR-N2012-1/23 and USPS-LR-N2012-1/24. USPS-LR-N2012-1/23 provides the Excel spreadsheets for Tables 9 and 10 (in spreadsheet LR23 Tables.xls, sheets Section Two and Section Three). These spreadsheets link to the other spreadsheets in USPS-LR-N2012-1/23, which are files from Docket No. ACR2010, though modified as shown to include additional or modified calculations. Table 11 is provided in USPS-LR-N2012-1/24 in the spreadsheet "Smith Testimony Tables.xls". Table 11, provided on tab Table 11, links to the other tables of my testimony, which are contained on the other tabs of this spreadsheet.