

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Mail Processing Network :  
Rationalization Service : Docket No. N2012-1  
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORIES TO  
POSTAL SERVICE WITNESS NERI

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Interrogatories to Postal Service witness Neri GCA/USPS-T4-1 to -16

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media).

January 11, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover  
2970 S. Columbus St., No. 1B  
Arlington, VA 22206-1450  
(703) 998-2568  
(703) 998-2987 fax  
E-mail: [postamp@crosslink.net](mailto:postamp@crosslink.net)

GCA/USPS-T4-1

On page 2, lines 8-21, of your prefiled testimony, you list three factors as responsible for excess processing capacity: an increase of processing equipment when mail volume was increasing, a growth of worksharing over the same period, and declining volume in First-Class Mail (FCM) since 2006.

(a) Please confirm there was excess processing capacity within the Postal Service before 2006. If you do not confirm, please explain why.

(b) Please explain fully what efforts were undertaken by the Postal Service to reduce excess mail processing capacity before 2006, including all automation equipment and labor expenditures.

(c) What efforts were undertaken by the Postal Service before 2006 to reduce excess facility and transportation expenses associated with mail processing?

GCA/USPS-T4-2

On page 3, line 7 of your testimony, you state that the Postal Service has over 487 mail processing facilities. Please break this total down into P&DCs, P&DFs, LDCs, NDCs, CSMPCs, DDCs, MPAs, and STCs. For each facility, please include the location of each by city and state.

GCA/USPS-T4-3

(a) Please define what functions are performed for “manual letters” at an ADC, as referenced on page 3, line 23, of your prefiled testimony.

(b) What letter characteristics define the difference between manual letters and automation letters?

(c) Do any single-piece letters, such as prebarcoded business reply letters, bypass the ADC?

GCA/USPS-T4-4

(a) Is there excess capacity in BMEUs and DMUs? Please explain fully.

(b) (i) What percentage of commercial mail, by class, is sent to BMEUs and DMUs and (ii) what percentage is “transported by mailers directly to the postal processing facilities for entry”? (USPS-T4, page 4, lines 24-25.)

GCA/USPS-T4-5

(a) Regarding letter sorting operations prior to DPS processing: is any of this work performed on DPS machinery? If yes, how much?

(b) If your answer to (a) was “no”, then in light of excess capacity on DPS machinery, please explain (i) whether any upstream processing prior to a DPS sort is or could be carried out on DPS machinery while the upstream machinery is reduced or eliminated, and (ii) if no such processing is performed on DPS machinery, why it is not.

GCA/USPS-T4-6

(a) Can DBCS automation equipment use other programs beyond the DPS sort program, e.g., incoming primary and secondary sorts? If so, please state what programs can be used.

(b) If your answer to (a) is affirmative, has this been done as DPS was being phased in?

Please explain your answers fully.

GCA/USPS-T4-7

What percentage of operations inefficiencies are due to “unpredictable mail arrival”? (USPS-T4, page 12, line 7.)

GCA/USPS/T4-8

On page 12, lines 6-7, of your prefilled testimony you attribute lack of operations efficiency in part to a drastic decline in mail and a major shift in the mail mix.

(a) Other than a decline in First-Class letter mail, what other declines and/or major shift(s) are you referring to?

(b) For each shift in mail mix referred to in your answer to (a), please explain fully how the shift causes a loss of efficiency.

GCA/USPS-T4-9

(a) Please quantify your statements on page 12, lines 17-23. Specifically: (i) Is the late arrival problem a small, moderate, or large issue in terms of the carrier time lost in manual casing? (ii) Please supply any estimates available to you of the amount of such time lost, in terms of workhours, dollars, or both.

(b) (i) Please explain the mechanism by which the late arrival issue results in additional clerk time. (ii) Please supply any estimates available to you of the amount of such additional time, in terms of workhours, dollars, or both.

GCA/USPS-T4-10

Please refer to page 13, lines 1-4, of your prefiled testimony, where you state that small operating windows create a need for extra processing equipment to meet overnight service standard commitments.

(a) For all letter mail processing equipment, including but not limited to DBCS equipment, please list the number of hours in a 24-hour day, for each of the seven days of a week, that such equipment is not in use. Please provide the mean downtime for each type of equipment in non-holiday periods, as well as the range of hours for non-use by each type.

(b) On page 13, Figure 5, please explain fully why your DPS window for letters is eight hours, from 11 p.m. until 7 a.m., whereas Postal Service witness Rosenberg states that there is a four-hour window that ends, evidently, at 5:30 a.m. for last volume overnight delivery arriving around 1:30 a.m. (cf. USPS-T3, page 2, lines 1-3).

GCA/USPS-T4-11

You state at page 14, lines 21-23, of your testimony that the proposed network discussed in Postal Service witness Rosenberg's testimony was "designed around the service changes proposed by witness David Williams (USPS-T-1)." Does this mean that witness Williams proposed the changed standards for overnight delivery, and that witness Rosenberg used the changed standards as an input for her own work? Please explain your answer fully.

GCA/USPS-T4-12

Please refer to your prefiled testimony at page 14, lines 1-20.

(a) What, to date, is the average length of time between the start of an AMP process and its conclusion, both for plants actually closed, and for all AMP studies regardless of whether the study led to a plant closing?

(b) For plants that were closed under an AMP process, what was the length of time between the recommendation for closure, and the actual point at which the plant was shut down or consolidated?

(c) Under the proposed network rationalization plan, in light of your answers to (a) and (b) above and the number of personnel available to perform AMP, how many years would it take to complete the network rationalization?

GCA/USPS-T4-13

(a) Given current entry deadlines for worksharing mailers to enter their letter mail into the Postal Service network, and assuming delivery deadlines for a mailer to present mail to a presort bureau are 6 p.m., what would you estimate is the capacity utilization of their MLOCR, BCS and related mail processing equipment based on a 24-hour, seven-day-a-week availability?

(b) How would your new entry deadlines for worksharing mailers affect your answer in (a)?

GCA/USPS-T4-14

(a) Please explain how the end of overnight delivery, would “improve service” as you state on page 15, line 13.

(b) Does the reference to improving service, cited in (a), refer only or principally to service performance?

GCA/USPS-T4-15

Please refer to page 15, lines 21-22, of your prefiled testimony.

You assert that network rationalization would allow elimination of the AADC/ADC distinction and that as a result “automation letters along with manual letters, flats and parcels could be tendered directly to the destinating facility.” This being the case, please explain fully why the overnight delivery standard would be maintained for workshared letters, albeit with two earlier windows, but totally eliminated for manual letters?

GCA/USPS-T4-16

(a) Please explain whether your calculation of “an idle time reduction of 27 percent” (page 18, lines 10-11) is based on your eight-hour current window or witness Rosenberg’s 4 hour window.

(b) Please explain why a 27 percent reduction in idle time would require a 100 percent increase in the time allowed to process a single piece letter, that is, from one to two days.