

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

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY
TO NALC INTERROGATORIES NALC/USPS-T10-1 AND 2**
(January 23, 2012)

The United States Postal Service hereby provides the responses of witness Michael Bradley to the above-listed interrogatories of the National Association of Letter Carriers. 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 BRADLEY TO NALC INTERROGATORY

NALC/USPS-T10-1

On page 11, line 16 of your testimony, you set forth an equation that refers to “Work Load.” Please explain how you defined and measured “Work Load” for purposes of this equation?

RESPONSE:

This equation is defining productivity in mail processing operations. The term “Work Load” refers to the work accomplished in an operation. For example, in a sorting operation, the work load would refer to the number of pieces sorted.

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BRADLEY TO NALC INTERROGATORY

NALC/USPS-T10-2

The percentages on Tables 2 and 3 of your testimony (pages 13-14) do not match the percentages on Table 4 (page 17). For example, Table 2 lists the percentage of BCS/DBCS as 22% but Table 4 lists it as 18%. Please explain the basis for this difference.

RESPONSE:

The reason that the percentages do not match is that they are measuring different things. The percentages in Table 2 and 3 are measuring the percentage increase in productivity expected in the various operations. In contrast, the percentages provided in Table 4 are measuring the percentage cost saving induced by the productivity increase. To see that these are different, consider a doubling of productivity, which is a 100 percent increase. If the productivity in an operation is doubled, then it takes half as much time to accomplish the same work. Thus, the percentage cost saving is 50 percent. More formally, for a given percentage productivity increase, ρ , the associated percentage cost saving is given by the following formula: $\rho / (1 + \rho)$.