

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

ORIGINAL

RECEIVED

FEB 17 4 11 PM '99

MAILING ONLINE SERVICE

Docket No. MC98-1

MOTION FOR LATE ACCEPTANCE OF AND
RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-26)

The United States Postal Service hereby provides its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-26, filed on February 4, 1999. The Postal Service moves that this response be accepted one day late, due to schedule conflicts of key staff.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

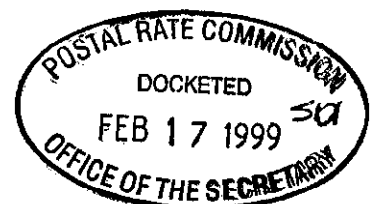
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
February 17, 1999



RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-26. Please refer to Bi-Weekly Data Reports for A/P 3, Weeks 1-4, and A/P 4, Weeks 1 and 2.

- a. Please confirm that none of the Qualification Reports contained in these Bi-Weekly Reports shows a depth of sort deeper than Automation Basic. If you do not confirm, please provide the dates and number of pieces on the Qualification Reports showing a deeper depth of sort.
- b. Please refer to the Qualification Report dated November 5, 1998, for a mailing of 1085 pieces.
 - i. Please confirm that this mailing consisted of two trays. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
 - ii. Please confirm that the first tray contained 647 pieces. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
 - iii. Please confirm that the first tray was 3-digit tray. If you do not confirm, please explain the meaning of the entry "3DG" in the column labeled "Tray Level."
 - iv. Please explain why the pieces in the first tray are not listed under the column labeled "3B."
- c. Please refer to the Qualification Report dated November 6, 1998, for a mailing of 802 pieces.
 - i. Please confirm that this mailing consisted of six trays. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
 - ii. Please confirm that the first tray contained 25 pieces. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
 - iii. Please confirm that the first tray was 3-digit tray. If you do not confirm, please explain the meaning of the entry "3DG" in the column labeled "Tray Level."
 - iv. Please explain why the pieces in the first tray are not listed under the column labeled "3B."
- d. Table 3 of the Bi-Weekly Report for A/P 3, weeks 3 and 4, lists Batch Number B0000051 with Status Date of 11/23/98 as containing 1085 pieces. Appendix 1 of the Bi-Weekly Report for A/P 3, weeks 1 and 2, lists Batch B0000051 with Date Received of 11/20/98. However, neither of these Bi-Weekly Reports appears to contain a Qualification Report for Batch B0000051. Please provide a copy of the Qualification Report for Batch B0000051 or explain why no report exists.
- e. Please refer to the Qualification Report dated December 17, 1998, for a mailing of 1249 pieces.
 - i. Please confirm that this mailing consisted of five trays. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

- ii. Please confirm that the first tray contained 51 pieces. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
- iii. Please confirm that the first tray was 3-digit tray. If you do not confirm, please explain the meaning of the entry "3DG" in the column labeled "Tray Level."
- iv. Please explain why the pieces in the first tray are not listed under the column labeled "3B."

RESPONSE:

- a. Not confirmed. The mailing of November 7, 1998 (802 pieces - AP 03 Week 1) contained a less-than-full tray of 25 pieces sorted to the 3-digit level for ZIP Code 021. The tray contained mail where the delivery address ZIP Code began with one of the 3-digit prefixes processed at the sectional center facility (Boston, MA 021) in whose service area the mail was verified. This is a required 3-digit sortation. If there had been more than 150 pieces, the pieces would have been eligible for the 3-digit barcode rate. Because there were only 25 pieces, the automation basic rate applied.
- b.
 - i. Confirmed according to the handwritten changes made to the sortation/qualification report. The third tray was an overflow tray from the tray #2 sortation. There appeared to be space in tray #2 for the 28 pieces eliminating the need for the third (overflow tray.)
 - ii. Confirmed.
 - iii. Confirmed.
 - iv. The Sortation/Qualification Report shows Presorted First-Class sortation. The documentation correctly identified the pieces under the "BS" column

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

for this sortation. If the documentation reflected automation sortation the pieces in the tray would have qualified for the 3-digit barcoded rate and would have been shown under the "3B" column. Mailing Online corrected sortation/qualification software would show the pieces under the "3B" column although the postage would be paid at the higher automation basic rate.

- c. i. Confirmed.
 - ii. Confirmed.
 - iii. Confirmed.
 - iv. The Sortation/Qualification Report shows Presorted First-Class sortation. The documentation correctly identified the pieces under the "BS" column. If the Sortation/Qualification Report showed automation sortation the pieces would have been shown under the "BB" column. Although sorted to the 3-digit level there were less than 150 pieces and the 3-digit barcoded rate did not apply and the pieces were correctly paid at the basic automation rates. This was a less-than-full tray for the 3-digit ZIP Code (021) prefix of the SCF (Boston, MA) serving post office where mail is verified and a required sortation.
- d. Attached.
 - e. i. Confirmed.
 - ii. Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

- iii. Confirmed. This was a less-than-full tray for the 3-digit ZIP Code (021) prefix of the SCF (Boston, MA) serving post office where mail is verified and a required sortation.
- iv. The pieces are not listed under the "3B" column because the mailing was sorted as Presorted First-Class and was correctly shown on the documentation under the "BS" column. The correct column was "BB." A postage adjustment of \$73.89 was made for this mailing by the Business Mail Entry Unit for an incorrect tray label.

USPS Qualification Report

Mailer Name: Mail Id: 0001 Date: 20-Nov-98
 NETPOST
 USPS-NETPOST

PRINTED 20-Nov-98 02:02:00pm

Entry Point: (1) Local post office, WALTHAM, MA 02205
 Presort: (1) 1C/STD_A, Regular Letters REG (DMM M130)

Tray #	Tray Size	Tray Level	Tray Zip	Pkg Dest	Pc/Ver ID	CB	5B	3B	3/5B	BB	BS	SP	Running Totals
1	2	3DG	336	33601	All						25		25
				33602	All						58		83
				33603	All						21		104
				33604	All						24		128
				33605	All						101		229
				33606	All						35		264
				33607	All						43		307
				33609	All						36		343
				33610	All						47		390
				33611	All						15		405
				33612	All						30		435
				33614	All						22		457
				33615	All						14		471
				33617	All						19		490
				33618	All						14		504
				33619	All						22		526
				33624	All						12		538
				33629	All						27		565
				33675	All						12		577
				336	All						70		647
2	2 X	MADC	021	A301	All						11		658
				A320	All						18		676
				327	All						11		687
				328	All						11		698
				A331	All						11		709
				33511	All						18		727
				33594	All						10		737
				33716	All						10		747
				335	All						56		803
				337	All						93		896
				338	All						20		916
				342	All						19		935
				346	All						35		970
				M021	All						87		1057
				M021	All						28		1085
Mailing Total						0	0	0	0	0	1085	0	

Mailing Rate Summary	Pieces
Basic (BS)	1085
Total Reg. Non Automation	1085

Handwritten notes:
 KM
 2 X
 MADC 021
 VSCD
 ONE, 2 FT
 TRAY
 FOR MXID
 KM

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.

A handwritten signature in black ink, appearing to read "Scott Reiter", written in a cursive style. The signature is positioned above a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
February 17, 1999