

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
GREETING CARD ASSOCIATION INTERROGATORY (GCA/USPS-T4-23)**
(March 6, 2012)

The United States Postal Service provides the response of Postal Service witness Neri¹ (USPS-T-4) to the above-identified interrogatory of the Greeting Card Association dated February 17, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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¹ In its responses filed on March 2, 2012, the Postal Service indicated erroneously that this interrogatory would be redirected to the Postal Service for an institutional response. Responses of United States Postal Service Witness Neri to Greeting Card Association Interrogatories, PRC Docket No. N2012-1 (March 2, 2012).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO GREETING CARD ASSOCIATION INTERROGATORY**

GCA/USPS-T4--23

(a) With respect to your answer to GCA/USPS-T4-14, does the Postal Service already have data on the volume of overnight First-Class Letter Mail processed and delivered for each day of the year, Monday through Saturday?

(b) If your answer to (a) is not an unqualified "no," please confirm that most of the predictability of daily processing requirements is already contained in the available data, or can be inferred from statistical tests on that data. If you do not confirm, please explain why.

RESPONSE:

(a) Yes.

(b) Not confirmed. This subpart applies the concept of predictability in a manner different from its use in my testimony. More specifically, this subpart applies the concept of predictability in the context of the volume of mail and its distribution across days of the week, but my testimony uses the term "predictability" in the context of the timing of mail arrival for processing. References to "predictability" in the context of my testimony address the fact that first pass delivery point sequencing cannot be completed until all mail is available. Frequently, some First-Class Mail is not at the facility when first pass begins and has an irregular arrival profile, thus impacting operations.