

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

PERIODIC REPORTING
(PROPOSAL NINE)

Docket No. RM2015-2

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO QUESTIONS 1-14 AND 17-18 OF CHAIRMAN'S
INFORMATION REQUEST NO. 1, AND STATUS REPORT
ON QUESTIONS 15-16
(November 21, 2014)**

The United States Postal Service hereby provides its responses to Questions 1-14 and 17-18 of Chairman's Information Request No. 1, issued November 14, 2014.

The questions are stated verbatim and followed by the response.

The status of responses to Questions 15 and 16 is as follows. (Please see the attached for the text of those questions.) With respect to Question 15, Proposal Nine, as presented for review, focuses on the cost segments directly affected by the proposal (i.e., Cost Segments 6 & 7). For other cost segments, as is standard in these types of rulemaking proceedings, piggyback factors were used to estimate the indirect effects. Although this is in some respects a shortcut, the Postal Service views the information presented with the Proposal under this approach as entirely sufficient for purposes of evaluating the proposed methodology. The Information Request, however, seeks more complete development of the indirect effects, ultimately culminating in a rerun of the entire CRA model.¹ Accomplishment of this sequence of necessary tasks would take

¹ Question 15 seeks the city carrier proportions developed in C/S 7 that are used in C/S 12, 13, and 20, as well as the actual CRA Model run with the calculation workbook (FY13.Revised.Public.B.xlsx) with C/S 12, 13, and 20 implemented with the new proportions. This, in turn, would require extracting any additional DOIS data necessary

much longer than a week under any circumstances.

Additionally, Question 16 seeks updates of a separate delivery cost model (cost by shape, filed in the ACR as folder 19). Normally, in these types of proceedings, the Postal Service does not rerun every other model that uses as inputs the new outputs resulting from a proposed change in a CRA cost segment. Nonetheless, one can speculate that, since the direct impact on unit costs in Cost Segments 6 and 7 is relatively small, one would likewise not expect much of an indirect impact on the results presented in the cost by shape model in folder 19, wherein the Cost Segment 6 and 7 costs are only part of the costs considered.. Therefore, why a rerun of that model is requested is not clear. But to provide the information as requested (i.e., using FY13 data specifically) would also require the FY13 IOCS to be rerun to obtain FY13 IOCS costs by shape (the "KL" tables specified in part b of question 16). This would not be an insignificant undertaking.

Moreover, the Postal Service has now entered the period in which huge masses of FY14 data are being processed in order to prepare the FY14 ACR. Going back to provide the additional documentation requested in Questions 15 and 16 using FY13 data would interfere with that preparation activity. Ironically, it would also require devoting resources immediately to tasks which the Postal Service intended to accomplish in the extended lead time prior to implementation of any approved change at the end of FY15, which the Proposal noted was when the Postal Service hoped for the new methodology to take effect.

to develop the needed factors, updating the CS6&7 spreadsheet, uploading all this into the CRA Model, and running the model.

Of course, at some level, the Postal Service understands the interest in the material solicited in Questions 15 and 16. Ultimately, these analyses will need to be done with FY15 data to fully incorporate the proposal into the FY15 ACR. As noted, however, the Postal Service does not view that material as essential to the task at hand, evaluation of the merits of Proposal Nine. In that sense, in the view of the Postal Service, the extensive material filed today in response to Questions 1-14 and 17-18 can reasonably be interpreted to represent a “complete” response to Chairman’s Information Request No. 1. Order No. 2253 (Nov. 19, 2014) granted the Public Representative’s motion for an extension of the due date for comments until three business days after a “complete” response is submitted. The Postal Service notes, for example, that it has fully responded to the portions of the Information Request representing questions suggested by the Public Representative in her motion of November 10, 2014. Therefore, in the spirit of Order No. 2253, Proposal Nine perhaps could be considered “ripe” for the submission of party comments three business days from today.

Nonetheless, the Postal Service appreciates that it will not have literally completed its response to ChIR No. 1 until answers can be provided to Questions 15 and 16. It is the Postal Service’s intention to continue working on preparation of responses to those items as circumstances permit. It is difficult to predict, however, when those additional materials are likely to be available. Since the Postal Service never intended to implement Proposal Nine until FY15, if the submission of party comments is delayed until the necessary efforts on Questions 15 and 16 can be

completed, the Postal Service will have no objection to that result.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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1. In its Petition, Attachment at 1, the Postal Service states that it “seeks to utilize the Time Attendance Collection System (TACS) to decompose city carrier accrued costs into office costs (cost segment 6) and street costs (cost segment 7), replacing the current methodology that uses the In-Office Cost System (IOCS).” Petition, Attachment at 1. The Postal Service further states that “operational systems have matured to the point where they can now provide the necessary data. Thus, these percentages estimated by IOCS can be replaced with census data from TACS.” *Id.*
 - a. How long has TACS been in existence?
 - b. Please identify when the operational systems matured.
 - c. By what means did the Postal Service determine the maturity point?

RESPONSE:

- a. TACS became fully operational in 2001.
- b. The exact year when the system matured is not known.
- c. The Postal Service considers TACS currently mature for purposes of this proposal because almost all carriers have electronic clock rings in TACS, and because the percentage of time on the street from TACS is consistent with the percentage of time that carriers are recorded as clocked to the street in IOCS.

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2. In Docket No. RM2011-3, Order No. 1626, the Commission identified a study on city delivery carrier street time costs as a near-term research priority for the Postal Service. On April 18, 2013, in its response to Order No. 1626, the Postal Service provided a report on the research issues and reporting requirements related to city carrier street time costs.² Please explain the relationship of Proposal Nine to the research priorities for city carrier street time costs identified by the Commission in Order No. 1626.³

RESPONSE:

The two proposals to change analytical principles are not related. One proposal can easily be implemented without the other. However, the Postal Service has indicated in Docket No. RM2011-3 that it plans to use city street evaluations (i.e. Form 3999 dataset) to determine the cost pools for city street activities. The street evaluation data includes the amount of time carriers spend loading and unloading when their route is evaluated. The only "street"⁴ activity captured by the In-Office Cost System (IOCS) is loading and unloading the vehicle. Since the new city street model plans to use the route evaluation data for all other street activities to form cost pools, it seems appropriate and straightforward to utilize the loading and unloading time from the route evaluation data as well.

² Docket No. RM2011-3, Postal Service Report Regarding Cost Studies: Response to PRC Order No. 1626, April 18, 2013, at 3-19 (Report).

³ Extensive work has been done in Docket No. RM2011-3 which analyzed the Form 3999 route and DOIS datasets as possible sources with which to update the city carrier street time variabilities.

⁴ Delivery Operations considers loading and unloading the vehicle a street activity. However, the Cost and Revenue Analysis (CRA) Report currently considers loading and unloading the vehicle an in-office activity since it is captured by IOCS. One of the benefits of this proposal is to align the city carrier cost model with delivery operations treatment of carrier activities.

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3. Please refer to Library Reference USPS-RM2015-2/1. The Preface states that workbooks 'I_Forms_TACS.xlsx' and 'CS06&7_TACS' replace the worksheets publicly filed in the FY 2013 Annual Compliance Report (ACR) with Proposal Nine incorporated.
- a. For each workbook referenced above, please provide references to the original FY 2013 ACR filings (without Proposal Nine incorporated).
 - b. For each worksheet in the workbooks referenced above, please indicate what cells are impacted by changes related to Proposal Nine.

RESPONSE:

- a. Workbook I_Forms_TACS replaces I_Forms in USPS-FY-32.

Workbook CS06&7_TACS replaces CS06&7 in USPS-FY32.

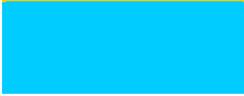
- b. Please see the Excel file provided as part of USPS-RM2015-2/2, ChIR.1.Q3b.xls. The cells that are impacted by the changes related to Proposal Nine are shown on workbook CS06&7_TACS.xls. Worksheet tabs that are colored in red contain structural changes. Within that worksheet, the type of structural change is indicated by color coding the relevant cells. Cells that are colored in yellow are In-Office costs that are scaled using the factor on the TACS Ofc_Str worksheet in I_Forms_TACS.xls, cell F28. Cells that are colored in orange use the revised IOCS costs from the TACS Ofc_Str worksheet in I_Forms_TACS.xls. Cells that are colored in blue indicate changes made to the assignment of street support costs. Green-colored tabs have no structural changes, but all the costs on the worksheet have changed due to changes in input values.

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Key to Tab Colors

	Structural change made to spreadsheet
	No structural change made to spreadsheet but costs are different due to change in Input values

Key to Color Coding on Spreadsheets

	IOCS costs scaled using factor from I_Forms.xls, sheet TACS Ofc_Str, cell F28
	Revised IOCS cost inputs from I_Forms.xls, sheet TACS Ofc_Str
	Structural change in spreadsheet for changes in support cost assignments

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4. Please confirm that in the workbook 'I_Forms_TACS.xlsx' the tab 'TACS Offc_Str' (filed in Library Reference USPS-RM2015-2/1) is the only completely new worksheet (in comparison with the original FY 2013 ACR filing) created by the impact of Proposal Nine. If not confirmed, please explain.

RESPONSE:

Confirmed.

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5. In its Petition, Attachment at 2, the Postal Service notes: "In the administration of delivery operations, loading and unloading vehicles are considered to be street functions."
- a. Please discuss why the Postal Service now proposes shifting the street vehicle loading/unloading time from Cost Segment 6 to Cost Segment 7.⁵
 - b. In the description and rationale for cost segment classification provided in its periodic report on the development of costs by segments and components, the Postal Service states that loading the vehicle is an in-office support cost.⁶ In Docket No. R2006-1, this same cost segment classification description (section 6.2.1) included additional information related to in-office support that can and can't be associated with a specific route type ("overhead" and "other"). If the in-office support can be associated with a route type, the costs are considered to be "other" support and include activities that support both office and street activities.⁷ Please discuss how the Postal Service will distribute in-office support work not associated with a specific route type in the DOIS data.

RESPONSE:

- a. There are two reasons for the current proposal. One, during internal discussions with operations regarding costs, it is extremely helpful to have cost models reflect the manner in which the activities are managed. Office time and street time are managed differently, thus having cost models reflect operational reality adds credibility to the cost models. Two, the proposal is current being made because the Postal Service now has the confidence in the Time and Attendance Collection System (TACS) to determine the office/street split rather than the In-Office Cost System

⁵ Petition, Attachment at 3, Component Number 2.

⁶ Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 2013, July 1, 2014, at 6-2, section 6.2.1.

⁷ Docket No. R2006-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 2005, USPS-LR-L-1, May 3, 2006, at 6-3, section 6.2.1.

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(IOCS). As was stated in the petition, replacement of the current sampling estimate of the office/street split with census data will increase the overall precision of the product cost estimates. This will also enable a redesign of the approach used by IOCS for sampling city carriers. If IOCS no longer has to estimate the office/street split, it can focus its sampling effort on carriers while they are in the office rather than on the street. For those two reasons, the Postal Service is proposing this change at this time.

b. The following table illustrates how Proposal Nine impacts the location, attribution, and distribution of costs that are currently classified as in-office support. Any support activity not listed in the table is not impacted by Proposal Nine. For those activities remaining in in-office support, the determination whether the activity can be associated with a particular route type will continue to be based on IOCS observations, not DOIS.

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In-Office Support Activity	Current Cost Segment	Proposed Cost Segment	Current Attribution/Distribution Method	Proposed Attribution/Distribution Method
Load/Unload while clocked to street	6	7	Office and Street costs	Street costs
Load/Unload while clocked to office (Activity code 6422)	6	6	Office and Street costs	Office costs
Clocking In/Out	6	6	Office and Street costs	Office costs

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6. For each route listed in the Library Reference USPS-RM2015-2/1 workbook 'Form_3999_Load_Unload.xlsx,' please indicate:
- a. Type of route (*e.g.*, residential, business, mixed residential, mixed business) and transportation type/mode of delivery (*e.g.*, dismount, curblines, foot, park & loop or "other"-please describe).
 - b. Which routes (if any) in the workbook 'Form_3999_Load_Unload.xlsx' are Package Delivery, Collection, Express/Expedited Delivery or Run, Relay, or "Combination/Other".⁸ Please describe what "other" routes are.

RESPONSE:

- a. The requested information is included in a workbook named Chir1.Q6a.xlsx, provided as part of USPS-RM2015-2/2. The delivery mode 'other' are for those routes that do not fit into one of the other four categories. A route where a carrier uses a Segway or uses public transportation are examples of routes that have a delivery mode of 'other'. There are only 301 routes classified with a delivery mode of other out of approximately 140 thousand letter routes.
- b. None. The Form 3999 database only includes information on regular letter routes. Other routes in the context of "Combination/Other" are "routes" that can involve several activities such as package delivery, relays, pickup on demand etc. They often don't perform the same activities daily as they might deliver packages on a route to assist a letter carrier with heavy workload. A typical combination route does package delivery first and then sweeps collection boxes later in the day.

⁸ This level of route detail is available and collected in Questions 'Q16E01' and 'Q16E02' of the IOCS.

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7. Component Seven of Proposal Nine provides that "Data will be reported by route groups (letter and special purpose) rather than by route type." Petition, Attachment at 4. The Excel workbooks, 'CS06&7_TACS.xlsx' and 'I_Forms_TACS.xlsx' provided in Library Reference USPS-RM2015-2/1 contain several worksheets that show data by route type.
- a. Please indicate which cost segments the Postal Service proposes to only report by two route groups.
 - b. Please identify the worksheets where the route groups are found.
 - c. Please explain the benefits of reporting by route groups rather than by route type.

RESPONSE:

- a. The Postal Service proposes to use only two route groups for reporting in cost segments 6 and 7.
- b. Route group 1 encompasses letter routes, where carriers clock to LDCs 21 and 22. Route group 2 encompasses special purpose routes, where carriers clock to LDCs 23 and 27. In workbook CS06&6_TACS.xls, on sheet "Input CS6", see columns F and G.
- c. While data by route type have continued to be collected by IOCS, they are not used in the Annual Compliance Report. Furthermore, while TACS can be used to separate time spent on letter routes (LDCs 21 and 22) versus special purpose routes (LDCs 23 and 27), it cannot be used directly to identify specific route types. But since the data are not used, there is no loss in reporting only by route group, and there is a benefit in the potential to reduce the data collection burden.

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8. In its Petition, Attachment at 4, the Postal Service states: "Most city carriers have the street portion of their routes evaluated annually." There are 64,405 routes that appear to have been evaluated between October 1, 2012 and June 3, 2013 in the 'Form_3999_Load_Unload.xlsx' workbook provided in Library Reference USPS-RM2015-2/1. Given the annual variation in the number of evaluated routes, is there a minimum annual number of evaluated routes the Postal Service will use to calculate the street vehicle loading and unloading times? Please explain your response.

RESPONSE:

Street route evaluations are a critical method used by management to control city carrier street costs. This explains the current standard procedure that each route be evaluated annually. There are no plans to stop the current practice of evaluating routes on an annual basis. Thus, the Postal Service has not determined a minimum threshold of evaluated routes to use to calculate loading and unloading times. The list of routes submitted with the original proposal contains the latest street route evaluation for all active city regular letter routes. The Postal Service proposes to use the list of the latest street route evaluations of active routes to calculate the city carrier loading/unloading vehicle labor cost. This is analogous to the current treatment of rural carrier costs (cost segment 10) where the cost pools are based on the latest rural mail count for each active route, see USPS-FY13-40 for more information.

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9. How do the routes identified in the 'Form_3999_Load_Unload.xlsx' workbook for FY 2013 differ from the routes that were not evaluated in FY 2013? Please include in your response the method and assessments made to determine inclusion of the routes listed in the 'Form_3999_Load_Unload.xlsx' file provided in Library Reference USPS-RM2015-2/1.

RESPONSE:

The table below shows the mean loading/unloading time for routes with its latest evaluation in FY2013 as compared to those done previously. The workbook filed with the original petition contained all of active city routes, regardless of when the last evaluation was conducted.

Year	Street_Hours	Load_Unload_Hours	Load_Unload_Pct
2013	310,027	16,237	5.24%
Before 2013	549,175	27,538	5.01%
Total	859,201.46	43,775	5.09%

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10. Please provide the TACS F-21 Handbook and the TACS Timecard codes and MODS codes used to create the office and street workhours split, and the motorized and foot workhours for Proposal Nine.

RESPONSE:

The TACS F-21 Handbook is provided in a pdf file (Chir1.Q10.F21.pdf) as part of USPS-RM2015-2/2. The TACS Timecard codes are located in Appendix B of the TACS F-21 Handbook. The MODS codes used to create the office and street workhours split for Proposal Nine are included in an Excel workbook (Chir1.Q10.MODS.xls) as part of USPS-RM2015-2/2. LDCs 21 and 22 are used to identify letter routes, while LDCs 23 and 27 are used for special purpose routes. Data for motorized and foot workhours will come from DOIS, not TACS.

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11. Please indicate which (if any) source SAS programs and calculations changed as a result of Proposal Nine. For the SAS programs that were changed as a result, please file the SAS programs with the Commission and indicate sections modified and related worksheet calculation(s).

RESPONSE:

The production SAS programs have not yet been modified. Please see the response to question 12 of this Information Request for a description of the anticipated changes.

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12. In its Petition, Attachment at 1, the Postal Service notes that the Proposal is being filed now to allow ample time for consideration and, if approved, to allow the Postal Service sufficient time to make the necessary changes to the IOCS data processing software.⁹ Please describe and provide a comprehensive list of the related IOCS data processing changes associated with Proposal Nine.

RESPONSE:

One way that Proposal Nine could be implemented would be:

- Change the inputs for program ALB101 so that the control total dollars represent only the in-office costs for carriers, with a control total for each pair of roster designation group (full-time, part-time/transitional) with route group (regular letter, special purpose), for each IOCS strata.
- Modify program ALB101 to re-categorize IOCS tallies according to the new costpools. IOCS tallies where the carrier is clocked to the street would be assigned zero cost. Then the estimation procedure continues otherwise unchanged.

Elimination of reporting by individual route type can be accomplished by changes in ALBCARMM. Depending on how the change was implemented, there could also be corresponding changes in ALB106 and ALB040 to either eliminate the individual route type and add a new route group variable, or redefine the existing variables to represent the route group instead of individual route type. However

⁹ In its Petition, Attachment at 1 of the Petition notes: "The Postal Service hopes to implement this methodology change for reporting costs at the conclusion of Fiscal Year 2015."

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none of these changes involving reporting by route type would affect the cost impacts from Proposal Nine.

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13. Slide 32 presented at the Technical Conference in Docket No. RM2011-3 notes that Form 3999 may not include all parcels.¹⁰ Loading/unloading time may differ based on volumes and the type of mail delivered. The percent loading/unloading in the 'Form_3999_Load_Unload.xlsx' workbook filed in Library Reference USPS-RM2015-2/1 shows a large range of street times for loading and unloading the vehicle. From the data shown in the CS06&07_TACS.xlsx in worksheet tab '6.0.3' (filed in Library Reference USPS-RM2015-2/1), it appears that the average loading time from all years listed in the 'Form_3999_Load_Unload.xlsx' workbook, approximately 5 percent, was multiplied by the total FY 2013 city carrier street time to obtain the overall loading and unloading vehicle time.
- a. Please explain why the Form 3999 data may not include all parcels.
 - b. How does the absence of some parcel data impact the loading/unloading vehicle time?
 - c. Please explain why it is appropriate to calculate an average loading/unloading vehicle time, from a consolidated number of years, over a variety of routes and transportation types/delivery modes.

RESPONSE:

- a. Slide 32 from the Technical Conference is referring to parcel volumes.

Operations generally only considers larger parcels in their daily parcel volume *counts*. The general rule is to include only those parcels that are larger than a "bread box". The reason for this is that they are trying to determine how many of a carriers' parcels will require a deviation, and thus additional street time, to deliver. The smaller parcels are to be included in the cased flat counts.

- b. Missing parcels have no impact on loading/unloading *time* as when an evaluation is conducted the carrier the loading time includes the entire interval it takes for the carrier to load and unload the vehicle.

¹⁰ Docket No. RM2011-3, Technical Conference Slides, PRC-RM2011-3-LR1, August 7, 2013.

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c. The Form 3999 database provides a picture of the amount of time letter carriers spend in certain street activities, including loading and unloading the vehicle. Ideally, the Postal Service would have daily times across all route types for loading and unloading the vehicle, so that a census could be used. Currently, that is not available. So, in lieu of that, as an approximation, it is appropriate to use a recent one day figure from all *active* letter routes to estimate the *proportion* of time carriers spend loading and unloading the vehicle. Since all active city letter routes are included, this method takes into account the different route types and delivery modes that currently exist as part of the city letter route network. Thus, this proposal is approximating the proportion of loading/unloading costs for LDC 23 and 27 with the same proportion utilized by letter route carriers. However, since letter routes encompass more than 95 percent of total street costs, any discrepancy in the proportions between the two sets is unlikely to result in a material difference in actual loading/unloading hours. As reliable operational information becomes available for LDC 23 and 27 street activities in the future, the Postal Service hopes to incorporate that information into its city carrier street cost model.

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14. Please refer to the Scoping Study Report of the United States Postal Service filed in Docket No. RM2011-3.¹¹ On page 11 of the Scoping Study Report, the Postal Service reports that the Form 3999 data set does not include accountables or collection volume. With respect to Proposal Nine, please discuss the impact of the absence of accountables and collection volumes on the loading/unloading vehicle times.

RESPONSE:

The absence of accountables or collection volume has no impact on the loading and unloading time. This is because the entire interval, including any time for accountables or collections, needed for the carrier to load or unload the vehicle is captured during the route evaluation.

¹¹ Docket No. RM2011-3, Scoping Study Report of the United States Postal Service, May 25, 2012 (Scoping Study Report).

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15. In Library Reference USPS-FY13-2 and USPS-FY13-32 filed in Docket No. ACR 2013, the preface discusses the Cost and Revenue Analysis (CRA) process and the 'Public CRA Revisions of 02/06/2014': "All data from the outputs to the CRA tab gets uploaded into the CRA model."
- a. Please provide the worksheet tabs from Library Reference USPS-FY13-31 – FY2013 CRA Model/costs/FY13.Revised.Public.B.xlsx filed in Docket No. ACR 2013 that show the Development of Cost by Segment and Component for cost segments 06, 07, 12 and 13 with the incorporated Proposal Nine methodology.
 - b. Please provide and identify any other model, report or cost inputs in USPS-FY13-31 by worksheet and worksheet cell affected by Proposal Nine.
 - c. Please also provide the comparable information to that requested in parts a. and b. to this question for the nonpublic library reference in USPS-FY13-NP13 filed in Docket No. ACR 2013.

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16. In Library Reference USPS-FY13-19, 'FY 2013 Delivery Costs by Shape' filed in Docket No. ACR 2013, uses the IOCS cost segments 6 and 7 in the 'UDCinputs13.xlsx' file which is subsequently used in the unit delivery costs model file 'UDCModel13.xlsx.'
- a. Please provide the 'UDCinputs13.xlsx' file and the 'UDCModel13.xlsx' file with the Proposal Nine methodology incorporated and identify which worksheets and cells were impacted by the proposed methodology change.
 - b. For the SAS log text files provided in USPS-FY13-19, 'KL Table13_All,' 'KL Table 13_Casing' and 'KL Table 3_FCSP_Collection_Cost_By_Indicia', please indicate which (if any) are impacted by Proposal Nine.

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17. Please describe the route type "Other" as shown in the Code A Variables 'F260' list on the last page of the IOCSDataDictionaryFY13.xlsx filed in Library Reference USPS-FY13-37 in Docket No. ACR 2013.

RESPONSE:

The "Other" route type includes Express Mail and *ad hoc* routes as well as multi-purpose routes that are combinations of letter, package delivery, collection, relay and firm delivery route types.

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18. Please refer to the Scoping Study Report of the United States Postal Service filed in Docket No. RM2011-3.¹² The Postal Service states: "A route evaluation is the process through which the Postal Service collects data on times the carrier spends in the various office (Form 1838) and street (Form 3999) activities on a route." Scoping Study Report at 8.
- a. Does the Form 1838 provide office time for loading/unloading the vehicle?
 - b. If so, why does the Postal Service propose using the Form 3999 in Proposal Nine for the loading times on the street (rather than the IOCS) and not the vehicle loading time for the office using Form 1838 (rather than the IOCS)?

RESPONSE:

a. and b. Postal Form 1838 does not include time for loading and unloading the vehicle as those are considered street activities and thus are captured on Form 3999.

¹² *Id.* Scoping Study Report.