

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T3-19-20)
(February 1, 2005)

The United States Postal Service hereby provides the responses of witness Abdirahman to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T3-19-20, filed on January 18, 2005. A partial objection to interrogatory OCA/USPS-T3-20 was filed on January 28, 2005.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

OCA/USPS-T3-19. Please refer to the “Premium Forwarding Service Cost Analysis,” appended to your testimony, at 2, n. 6. Note 6 reads “LR-J-69 Table 5.2.5.4 N8.” Table 5.2.5.4 displays “Cost Per Piece for UAA Mail Forwarded with Postage Due and Delivered at Call Window.” Row 2, Column A, of Table 5.2.5.4 presents the “Hours/Piece” for “Collection of Postage Due” at a Call Window.”

- (a) Please confirm that a Call Window is generally used by business customers whose mailings tend to involve multiple pieces of mail, sometimes a very large volume of mail . See e.g., USPS-LR-J-172, Office of Inspector General Report Number AC-AR-01-001, at 1 (footnote omitted): “Many high-volume mail customers purchase post office box service, which separates mail by post office box number and allows mail pick-up during the hours the box lobby is open. When mail volume exceeds the largest installed box size, caller service enables the customer to pick up mail at a post office call window.” If you do not confirm, please explain.
- (b) Please provide the documentation and results of the 2-week study that are the basis of the hours/piece figure that you use, i.e., the study described in Table 5.2.5.4, note 1.
- (c) What was the average transaction time (hours/transaction) time observed in the cited study for collection of postage due at the call window?
- (d) What was the average number of pieces per transaction for collection of postage due at the call window observed in the study?

RESPONSE:

- (a) Not Confirmed. While it is true that the call window is often used by business customers whose mailings tend to involve multiple pieces of mail, the call window is also used by the general public to pick up items for which notices of attempted delivery were left, including mail requiring collection of postage due. In addition, post office box customers often interact with call window personnel to sign for and pick up accountable items including postage due items and oversized packages that would not fit into their post office boxes.

(b-d) Please refer to appendix A of library reference LR-I-82/R2000-1 for the two week study survey documentation, available on the Commission’s website at:

<http://www.prc.gov/docs/22/22050/USPS-LR-I-82.pdf>

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Results of the two week study including transaction time and pieces can be found on
Form 2 of library reference LR-J-69/R2001-1, available on the Commission's website at:

<http://www.prc.gov/docs/29/29909/USPS-LR-J-69.xls>

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OCA/USPS-T3-20. Please refer to the “Premium Forwarding Service Cost Analysis,” appended to your testimony, at 2, n. 7. Note 7 cites LR-J-69 Table 5.2.1.1, Row 2, for the “Hours/Piece” to process Change –of-Address cards. In turn, note 4 of Table 5.2.1.1 references Handbook M-39, “Management of Delivery Services Handbook,” for the 2 minutes to process Change-of-Address cards. Please provide a copy of the most recent version of Handbook M-39.

RESPONSE:

Item 12 in the attached copy of Exhibit 222.214a(4) from the most recent version of Handbook M-39 provides the two minutes per change of address card time I use in my cost analysis.

Exhibit 222.214a(4)

Time Allowances for Carrier Office Work**TIME ALLOWANCES FOR CARRIER OFFICE WORK**

Form 1838		Pieces Per Minute	
Line No.	Work Function	1-Trip	2-Trip
1	Routing letter-size mail.	18	18
2	Routing all other size mail. (Use Notice 26, Maximum Time Allowance for Routing Mail, to convert pieces to minutes.)	8	8
Minutes			
4	Strapping mail in bundles or placing in trays, preparing relays and placing mail into satchels; for each 70 pieces regardless of character (minimum allowance 3 minutes). Strapping mail in bundles for markup at computerized forwarding unit. Lines 1-2-3 combined mail volume (strapping out pieces and markup pieces) is used in determining time allowance at 70 pieces per minute.	1	
8	For each 10 pieces of all classes of mail separated for forwarding or return.	1	
9	Periodicals marked up (for each 2 pieces handled for forwarding or return).	1	
10	For each Form 3579, Undeliverable Periodical, Standard A & B or Controlled Circulation Matter.	2	
11	For each 4 pieces marked up (mail marked Deceased, Temporarily Away, Refused, Vacant (Occupant mail of obvious value) or No Mail Receptacle).	1	
12	For each change of address, including Form 3546, recorded on Forms 1564-B and 3982.	2	
13	Insured receipts turned in.	1	
14	Registered, Certified, COD, Express Mail, Customs and Postage-Due; Keys, Form 3868, signing for, returning funds or receipts, and for partial completion of Form 3849 (name or address for identification). Base minimum allowance is 6 minutes.	*	
15	Withdrawing mail where applicable (from distribution cases, trays, sacks, and/or hampers). Base minimum allowance is 5 minutes.	*	
16	Sequencing and collating by-pass mail. (Representative time in minutes will be allowed for work function.)		
17	Strapping out time (when mail must be placed in order of delivery) see 922.51d. (Representative time in minutes will be allowed for the work function.)		
18	Break (local option).		
19	Vehicle inspection see 922.51f. Base minimum allowance is 3 minutes.	*	
20	Personal needs, etc. (Time allowances are printed on the form for each trip, and must not be changed.)		
21	Office work not covered by form. (Work functions must be identified and approved as being necessary and of a continuing nature.) (Use "Comments" section.) Base minimum allowance is 9 minutes.	*	
22	Waiting for mail (office) and all other office activities not performed on a continuing basis which are excluded in computing net office time. (Use "Comments" section.)		
23	Counting Mail and filling out Form 1838-C worksheet.		

Note: For piece items, grant the next higher allowance in minutes for fractional units.
Use actual times for Lines 14 through 19 and Lines 21 through 23 when those functions are performed.

* Computing Standard Office Time Under Columns (e), (f), and (g) on Form 1838:

If the actual time for each of Lines 14, 15, 19, and 21 is less than the base minimum and the carrier performs the function the base minimum must be entered for the Line Item in the appropriate column. If the actual time exceeds the base minimum, an adjustment to that time cannot be shown which is less than the base minimum.

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.

/s/ _____
David H. Rubin

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