

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

INTERROGATORIES OF GREETING CARD ASSOCIATION
TO THE UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN
(GCA/USPS-T21-1-2)
(June 10, 2005)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Greeting Card Association (GCA) directs the following interrogatories to the United States Postal Service Witness Abdulkadir M. Abdirahman.

Respectfully submitted,

Alan R. Swendiman, Esquire

Counsel for
GREETING CARD ASSOCIATION

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GCA/USPS-T21- 1.

Please refer to R20051-1, Revised LR-K-48, Page 48 and R2001-1, LR-J-60, Page 51. For the R20051-1, MLOCR-ISS Accept Rate (Handwritten) you have a value of 4.8%. Please cross-reference this number to R2001-1.

GCA/USPS-T21-2.

Please refer to R2005-1, Revised LR-K-48, Page 48, R2001-1, LR-J-60, Page 51, and USPS Witness McCrery (USPS-T29) regarding lettermail processing technology.

- a) Please refer to R2001-1, LR-J-60 page 51. Please confirm that the following table is correct:

<u>Description</u>	<u>FCM Sing Pc Meter</u>	<u>FCM Sing Pc Mach Print</u>	<u>FCM Sing Pc Hand</u>	<u>FCM Nonauto Upgr</u>	<u>FCM Nonauto Non-OCR</u>	<u>STD(A) Nonauto 3/5 Upgr</u>	<u>STD(A) Nonauto 3/5 NO</u>	<u>STD(A) Nonauto Basic Upgr</u>	<u>STD(A) Nonauto Basic NO</u>
MPBCS OSS Accept	91.27%	90.52%	94.14%	93.28%	89.80%	92.03%	88.09%	91.33%	87.30%
MPBCS OSS Upgrade	91.46%	92.70%	92.99%	85.74%	87.57%	89.65%	91.19%	85.64%	87.65%
MPBCS OSS Errors:									
OSS Refeeds	1.38%	1.19%	0.96%	1.76%	0.90%	1.72%	1.33%	2.67%	2.54%
LMLM - ID Tag	5.99%	6.49%	3.95%	3.63%	7.06%	5.07%	8.06%	4.79%	7.28%
Manual	1.36%	1.80%	0.95%	1.33%	2.24%	1.18%	2.52%	1.21%	2.88%

- b) Please refer to Revised LR-K-48, Page 48. Please confirm that the following is correct.

OSS

Finalized	87.36%
ISS Refeeds	3.51%
OSS Refeeds	3.32%
LMLM	2.10%
Manual	3.71%

- c) Please explain why in R2001-1 there were different “OSS Refeeds” values for each of a variety of categories (class subclass, or smaller subunit) whereas in R2005-1 there is only one value for all.
- d) Please confirm that the average of all values for “OSS Refeeds” was 1.61% in R2001-1. If confirmed, please explain why in R2005-1 the average for “OSS Refeeds” is 3.32%, twice as large. If not confirmed, please provide the correct numbers.
- e) Please confirm that the “OSS Refeeds” values in R2001-1 were obtained from R97-1 whereas for R2005-1 they are obtained from LR-K-68. If confirmed please explain what changes (technological or non-technological) might have

caused the OSS refeed rate to shoot up since 1997, despite the fact USPS has been installing the top of the line machines since 1997.

- f) Please refer to the above table in a). Please confirm that in R2001-1 the average "OSS Manual" was 5.81% whereas in R2005-1 it is only 2.1%, less than one-half. Please explain what factors may have caused such a reduction and why you are using only one number for all classes and subclasses. If not confirmed, please provide the correct numbers.
- g) Please refer to the above tables. Please confirm that in R2001-1 the average OSS Manual was about 1.72% whereas in R2005-1 has risen to 3.7%, more than two times. If confirmed, please explain what factors may have caused such a rise given the fact that since R97-1 there have been many technological improvements. If not confirmed, please provide the correct numbers.
- h) Please refer to the tables above. Please confirm that in R2001-1 the average OSS finalized rate (Accept & Upgrade) was about 90.13% whereas in R2005-1, the corresponding number is 87.36%. If confirmed, please explain what factors might have caused this drop. If not confirmed, please provide the correct numbers.
- i) Assuming that the R2001-1 finalized rate of 90.13% had been used in R2005-1 rather than 87.36%, please confirm that the numbers in the following table are correct.

FIRST-CLASS MAIL LETTERS NONMACHINABLE SURCHARGE		
COST SUMMARY		
	OSS Finalized Rate	
	90.13%	Original 87.36%
MAIL TYPE	UNIT COST	UNIT COST
Nonautomation Nonmachinable All Presort Levels	33.865	33.873
Nonautomation Machinable All Presort Levels	14.891	14.885
Cost Difference	18.974	18.988
Nonautomation Nonmachinable Mixed ADC	44.390	44.402
Nonautomation Machinable Mixed AADC	15.303	15.295
Cost Difference	29.087	29.107
Nonautomation Nonmachinable ADC	39.714	39.724
Nonautomation Machinable AADC	15.303	15.295
Cost Difference	24.411	24.428
Nonautomation Nonmachinable 3-Digit	36.122	36.130
Nonautomation Machinable 3-Digit	14.626	14.621
Cost Difference	21.496	21.509
Nonautomation Nonmachinable 5-Digit	26.794	26.798
Nonautomation Machinable 5-Digit	14.626	14.621
Cost Difference	12.168	12.177
Nonmachinable SP	36.691	36.691
Nonmachinable Presort	10.983	10.995
Cost Difference	25.708	25.696

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.

Alan R. Swendiman

June 10, 2005