

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

SEVENTH SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS McCRERY
(MPA/USPS-T42-20-22)
(July 14, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatories to United States Postal Service witness Marc McCrery (USPS-T-42). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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QUESTIONS

MPA/USPS-T42-20. Please refer to your response to MPA/USPS-T42-1, which states:

“In FY 2005, 44.7% of incoming secondary flats were finalized in manual operations in the field. The percentage is derived from flat volume of 13,188,243,000 pieces that received manual incoming secondary distribution in the field out of 29,501,658,000 total incoming secondary flat volumes. Source: MODS and FLASH reports.”

(a) Please confirm that 13,188,243,000 is the total number of manual incoming secondary flat sorts performed by the Postal Service in FY 2005. If not confirmed, please explain fully the meaning of this figure.

(b) Please confirm that 29,501,658,000 is the total number of incoming secondary flat sorts performed by the Postal Service in FY 2005. If not confirmed, please explain fully the meaning of this figure.

(c) What are FLASH reports? Please explain the source of the data presented in FLASH reports.

MPA/USPS-T42-21. Please refer generally to Section III of your testimony, USPS-T-42, which discusses “Volumes and Workhours in Mail Processing,” and, in particular, to your discussion of (1) the “schemes effect” and (2) the previous testimony by Linda Kingsley in Docket No. R2000-1 and R2001-1.

(a) For flat sorting machines, you note that Kingsley’s investigation at two local plants found that an average of 10.7 daily sort schemes for each machine, compared to only 4.6 for the letter barcode sorters. In your experience, is it typical for FSMs to have this many daily scheme changes?

(b) For a representative AFSM 100 in today’s operating environment, please provide a list and description of all the sort schemes run on the machine during a single 24-hour period.

MPA/USPS-T42-22. Please refer to lines 11-18 on page 36 of your testimony, USPS-T-42, where you state:

“Out of the hundreds of schemes run each day, a few very large schemes

(e.g., the initial outgoing and incoming schemes, i.e., the “primaries”) may be run on multiple sorters due to time constraints. But for the vast majority of schemes, this is neither necessary nor desirable. If time did not allow for sorting, say, all the Alexandria letter mail, then Standard Mail letters would be held for later processing. Indeed, in the final sort for most letter mail -- when the mail is arranged in delivery sequence -- we are unable to split a run among machines even if there was a desire to do so, since there would be no practical means to merge the results.”

(a) Please confirm that running the same scheme on multiple sorters increases the number of “less-than-full” containers produced by the Postal Service since all containers (whether full or not) are swept at the end of the scheme, thus increasing container-handling costs in subsequent operations. If not confirmed, please explain fully.

(b) Please confirm that running the same DPS scheme on two different sorters would produce two DPS bundles for each carrier served by the DPS scheme. If not confirmed, please explain fully.

(c) Please confirm that most sort schemes are incoming “secondaries” (including DPS schemes) and that incoming secondaries sort mail from one or multiple 5-Digit ZIP Codes to carrier route or delivery point sequence. If not confirmed, please explain fully.

(d) In your experience, are non-DPS incoming secondary sort schemes almost always run on just one machine? If not confirmed, please explain fully.

(e) Separately for outgoing primary, incoming primary, incoming secondary, and managed mail schemes, what percentage of schemes are run simultaneously on multiple machines?