

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

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS MARC D. McCRERY (APWU/USPS T42-1-17)
(July 14, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness Marc. D. McCrery. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

Darryl J. Anderson
Counsel for American Postal Workers Union, AFL-CIO

O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
Fax: (202) 682-9276
DAnderson@odsalaw.com

APWU/USPS-T42-1 On page 11 of your testimony you state that non-barcoded presorted letters must first be barcoded on an MLOCR/DIOSS before they are processed.

- a) Are there operational reasons anymore for maintaining a nonautomation presort discount of any sort?
- b) Are there operational reasons anymore for maintaining a nonautomation presort discount for nonmachinable mail?

APWU/USPS-T42-2 Is accountable letter mail processed through the automated mail stream? If so, where does it enter the mail stream? Where does it exit from the mail stream; will it, for example, be delivery point sequenced?

APWU/USPS-T42-3 Are postal-applied barcodes always 11-digit? If not, under what circumstances is a 9-digit barcode applied?

APWU/USPS-T42-4 Can mail be delivery point sequenced using a postal-applied ID code rather than a barcode?

APWU/USPS-T42-5 What are the five most important reasons, in order of volume, for mail to fail to be delivery point sequenced?

APWU/USPS-T42-6 How many zones are not delivery pointed sequenced? Is there a conversion timetable to covert those routes to DPS processing?

APWU/USPS-T42-7 On pages 12 and 13 of your testimony you discuss DPS percentages.

- a) Does footnote 10 on page 12 mean that 79 percent of letter mail is delivery point sequenced? If not, please provide a more complete explanation of the 90 percent and 79 percent numbers mentioned in line 23 of page 12 and in footnote 10.
- b) When you refer to the total secondary distribution performed on automation on page 13 of your testimony, is that referring only to letter mail, letter and cards? Is there anything else included in that?
- c) On page 13 you state that 90 percent of the total is sorted to DPS, 4 percent to sector/segment, and 6 percent to carrier route. Which of this mail will require further sorting once it reaches its delivery unit.
- d) What source of data does the Postal Service use to obtain DPS statistics, both the percentage of mail that is delivery point sequenced and the distribution of mail by the categories listed in question c)?

APWU/USPS-T42-8 On page 5 of your testimony you discuss the replacement of MLOCRs with more efficient DBCS DIOSS-EC machines.

- a) Is it correct to understand that 646 of the MLOCRs will be replaced by DBCS DIOSS-EC machines by May 2007?
- b) Would you anticipate a lower reject rate from the automation mail stream for mail that is processed on a DBCS DIOSS-EC than on an MLOCR?

APWU/USPS-T42-9 On page 9 of your testimony you discuss the PARS system.

- a) When you state that 50 percent of move-related mail is intercepted at the origin processing facility, what time frame is that percentage for?
- b) What do you anticipate that percentage will be by the time Phase II of PARS is completed in September 2007?
- c) Approximately how many downstream handlings are eliminated by the interception of such mail at origin?
- d) If successfully processed by the AFR/REC identification process, does the mail remain in the automated mail stream for forwarding or return to sender activities?
- e) Once processed by the CIOSS system does the mail remain in the automated mail stream?

APWU/USPS-T42-10 Which pieces of Postal equipment are equipped to scan for CONFIRM (PLANET) codes? Are these picked up during the scanning process for regular barcodes or must this feature be "turned on". If this feature is not "on" all the time what determines whether it is on or off.

APWU/USPS-T42-11 How many CONFIRM-related scans did the Postal Service conduct in FY2005?

APWU/USPS-T42-12 What percentage of CONFIRM coded letters received at least one scan in FY2005? Has the Postal Service done any studies on the probability of a CONFIRM coded letter passing through a scanner but a scan is not recorded? If so please summarize the finding of those studies and when they were performed.

APWU/USPS-T42-13 In his testimony, Mr. Mitchum describes two different types of CONFIRM service, DESTINATION CONFIRM and ORIGIN CONFIRM. Are the scans conducted for these two types of services different? Please describe the types of scans that would be conducted and reported in these two types of services.

APWU/USPS-T42-14 How does the Postal Service use the CONFIRM data for internal operational purposes? What sorts of information about mail flow and mail processing do these data provide to Postal managers?

APWU/USPS-T42-15 In a typical mail processing facility, on what tour is workshared mail most likely to be processed and during which part of the tour is it most likely to be processed?

APWU/USPS-T42-16 In a typical mail processing facility, on what tour is bulk metered mail most likely to be processed and during which part of the tour is it most likely to be processed?

APWU/USPS-T42-17 Does the Postal Service keep an operational count of manually sorted mail by shape and class? If so, what have those data showed over the past 5 years?

APWU/USPS-T42-18 On page 12 you list unreadable barcode as a reason for mail to be sent to manual processing. Are postal applied barcodes less likely to be unreadable than are mailer applied barcodes?

APWU/USPS-T42-19 On page 12 you list insufficient barcode as a reason for mail to be sent to manual processing. Are postal applied barcodes less likely to be insufficient than are mailer applied barcodes?

APWU/USPS-T42-20 With reference to your response to PB/USPS-T42-5, would your response also include all changes and corrections you made to the PB/USPS-T29-8 responses during your oral cross-examination for R2005-1?

APWU/USPS-T42-21 With reference to your response to PB/USPS-T42-7, please provide an estimate of what percentage of the IOCS tallies may statistically represent these infrequent occurrences.