

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS McCRERY
TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
(MPA/USPS-T42-1-2)
(June 8, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-mentioned interrogatories of Magazine Publishers of America, Inc., filed on May 25, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSES OF POSTAL SERVICE WITNESS MARC D. MCCRERY
TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T42-1. Please refer to lines one through three on page 20 of your testimony, where you state, "Very few delivery units have an FSM, so the vast majority of the incoming secondary processing at the delivery units is manual. Very little manual incoming secondary distribution takes place at plants." Please also refer to lines four through six on page 21 of your testimony where you state, "In FY 2005, 59 percent of flat mail incoming secondary (non carrier-route presort) volume was processed in the plants, and 93 percent of this volume was finalized on automated operations."

(a) In FY 2005, what percentage of non-carrier-route presort flats received manual incoming secondary sorts? Please explain your calculation and produce, or provide citations to, underlying documents sufficient to replicate your results.

(b) In FY 2005, what percentage of Periodicals Outside County non-carrier route presort flats received manual incoming secondary sorts? Please explain your calculation and produce, or provide citations to, underlying documents sufficient to replicate your results. If no data specific to the Periodicals Outside County subclass are available, please provide your best estimate and explain the rationale for your estimate.

(c) What was the Postal Service's total piggybacked FY 2005 Periodicals Outside County manual incoming secondary flat sorting cost? Please explain your calculation and produce, or provide citations to, underlying documents sufficient to replicate your results.

Response:

a. 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.

b. The systems that record volume for particular operations do not collect information by mail class or subclass, therefore, a calculated percentage cannot be provided. Furthermore, I have no basis on which to provide an estimate.

c. Redirected to Postal Service witness Smith.

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MPA/USPS-T42-2. Please refer to your testimony at page 20, line 29, through page 21, line 2. There you state, “Also, any automation compatible Periodicals volume currently processed in a manual incoming secondary operation will be moved to an automated processing operation to the greatest extent possible when the processing window exists.”

(a) In the Test Year, what percentage of Periodicals Outside County incoming secondary flat sorts do you expect to be manual? Please explain your response fully and produce, or provide citations to, underlying documents sufficient to replicate your results.

(b) In the Test Year, what percentage of incoming secondary sorts for Periodicals Outside County flats that qualify for automation rates do you expect to be manual? Please explain your response fully and produce, or provide citations to, underlying documents sufficient to replicate your results..

(c) In the Test Year, what percentage of incoming secondary sorts for Periodicals Outside County non-carrier-route flats that do not qualify for automation rates do you expect to be manual? Please explain your response fully and produce, or provide citations to, underlying documents sufficient to replicate your results.

Response:

a – c. Without even baseline percentages from which to start, I have no basis upon which to provide estimates for the percentage of manual incoming secondary flats in the Test Year for this subclass and categories within the subclass.