

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS MARC D. McCRERY (OCA/USPS-T42-1-6)  
(June 13, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T42-1. This interrogatory seeks to clarify the processing of letter mail on the Advanced Facer Cancellor System (AFCS). Please refer to your testimony at page 2, lines 11-13, where it states:

Letter mail preparation operations first require that letters and cards are sorted into three separations: *barcoded*, *non-barcoded machinable*, and nonmachinable (manual) to the greatest extent possible. (emphasis added)

Also, please refer to your testimony at page 4, lines 1-3, where it states:

The AFCS culls, faces, cancels, and enables on-line sortation of letters and cards into either *local destinations*, *non-local destinations*, barcoded FIMs A and C, and rejects. (emphasis added)

- a. Please reconcile these two statements. For example, does the AFCS perform four separations (among others) of the following types: 1) local barcoded, 2) local non-barcoded, 3) non-local barcoded, and 4) non-local non-barcoded? Please explain.
- b. Please explain the distinction between “nonmachinable” letters and “rejects.” Give examples of both types of letters.
- c. Please state whether “nonmachinable” letters and “rejects” are manually processed. If your answer is that they are not, please explain. If your answer is that they are, please compare and contrast the manual processing of “nonmachinable” letters and “rejects.”

OCA/USPS-T42-2. This interrogatory seeks information on the processing of “low aspect ratio” letter mail on mail processing equipment. Please refer to the different types of mail processing equipment in your testimony at pages 4-11. Also, please refer

to your response to GCA/USPS-T42-3, which references a mailpiece described in GCA/USPS-T42-1 (herein “low aspect ratio” mailpiece).

- a. Please confirm that the AFCS does not have the capability to physically cull from the mailstream the low aspect ratio mailpieces referenced above. If you do not confirm, please explain.
- b. Please confirm that none of the other mail processing equipment (i.e., excluding the AFCS) discussed in your testimony at pages 4-11 have the capability to physically cull from the mailstream the low aspect ratio mailpieces referenced above. If you do not confirm, please explain.

OCA/USPS-T42-3. This interrogatory seeks information on the processing of “low aspect ratio” letter mail on mail processing equipment. Please refer to the different types of mail processing equipment in your testimony at pages 4-11. Also, please refer to your response to GCA/USPS-T42-3, which references a mailpiece described in GCA/USPS-T42-1 (herein “low aspect ratio” mailpiece).

- a. Please provide the name(s) of the manufacturer(s) of the 1,083 AFCSs currently in operation, and the number provided by each manufacturer.
- b. For the mailpiece referenced above, please provide each manufacturer’s estimated “probability of being rejected” on the AFCS after one attempt or pass, two attempts, and three or more attempts. Please provide tables or graphs from each manufacturer showing the estimated “probability of being rejected” (or, alternatively, being successfully processed) by aspect ratio.

- c. Please provide the name(s) of the manufacturer(s) of the 875 Multiline Optical Character Readers (MLOCs) currently in operation, and the number provided by each manufacturer.
- d. For the mailpiece referenced above, please provide each manufacturer's estimated "probability of being rejected" on the MLOC after one attempt or pass, two attempts, and three or more attempts. Please provide tables or graphs from each manufacturer showing the estimated "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio. If the Postal Service has estimated a "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio based upon empirical tests, please provide that estimate and a table or graph showing those test results.
- e. Please provide the name(s) of the manufacturer(s) of the more than 5,200 Delivery Bar Code Sorters (DBCSs) currently in operation, and the number provided by each manufacturer.
- f. For the mailpiece referenced above, please provide each manufacturer's estimated "probability of being rejected" on the DBCS after one attempt or pass, two attempts, and three or more attempts. Please provide tables or graphs from each manufacturer showing the estimated "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio. If the Postal Service has estimated a "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio based upon empirical tests, please provide that estimate and a table or graph showing those test results.

- g. Please provide the name(s) of the manufacturer(s) of the approximately 3,500 Carrier Sequence Bar Code Sorters (CSBCSs) currently in operation, and the number provided by each manufacturer.
- h. For the mailpiece referenced above, please provide each manufacturer's estimated "probability of being rejected" on the CSBCS after one attempt or pass, two attempts, and three or more attempts. Please provide tables or graphs from each manufacturer showing the estimated "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio. If the Postal Service has estimated a "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio based upon empirical tests, please provide that estimate and a table or graph showing those test results.
- i. Please provide the name(s) of the manufacturer(s) of the 547 Mail Processing Bar Code Sorters (MPBCSs) currently in operation, and the number provided by each manufacturer.
- j. For the mailpiece referenced above, please provide each manufacturer's estimated "probability of being rejected" on the MPBCS after one attempt or pass, two attempts, and three or more attempts. Please provide tables or graphs from each manufacturer showing the estimated "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio. If the Postal Service has estimated a "probability of being rejected" (or, alternatively, being successfully processed) by aspect ratio based upon empirical tests, please provide that estimate and a table or graph showing those test results.

- k. For subparts b., d., f., h., and j., above, please confirm that the estimated “probability of being rejected” is defined as the number of mailpieces referenced above that are sorted to reject bins (i.e., taken to subsequent automated processing or delivery operations) divided by the total number of such mailpieces. If you do not confirm, please explain.
- l. Please confirm that the estimated “probability of being rejected,” as defined in subpart k., above, decreases as the aspect ratio for a low aspect ratio mailpiece increases from 1:1 to 1:1.3. If you do not confirm, please explain. If you do confirm, please explain whether your answer is based on empirical evidence or a theoretical understanding.
- m. Please confirm that 1 minus the estimated “probability of being rejected,” as defined in subpart k., above, represents the estimated probability of being successfully processed (i.e., taken to subsequent automated processing or delivery operations) on the mail processing equipment referenced in subparts b., d., f., h., and j., above. If you do not confirm, please explain.

OCA/USPS-T42-4. This interrogatory seeks information on the processing and rate treatment of “low aspect ratio” letter mail. Please refer to your testimony at pages 2-11, concerning the processing of letter-shaped mail. Also, please refer to your response to GCA/USPS-T42-2, which references a mailpiece described in GCA/USPS-T42-1 (herein “low aspect ratio” mailpiece).

- a. Please confirm that the low aspect ratio mailpiece referenced above would receive manual letter processing, rather than being processed as a manual or machinable flat or parcel. If you do not confirm, please explain.

- b. Please confirm that for rate purposes, the low aspect ratio mailpiece referenced above would pay the rate applicable to the first ounce for a single-piece flat shaped mailpiece. If you do not confirm, please explain.

OCA/USPS-T42-5. This interrogatory seeks information on the processing of “low aspect ratio” letter mail on mail processing equipment. Please refer to your response to GCA/USPS-T42-1, which describes a “low aspect ratio” mailpiece. Your response to GCA/USPS-T42-1(b)(i), states that “Certain facilities manually face and cancel the rejects and direct them to a MLOCR/DIOSS for automated processing.”

- a. What types of facilities “manually face and cancel the rejects” for further automated processing? Please identify the types of facilities referred to, and the number of such facilities where this manual activity takes place.
- b. Please confirm that, in the facilities that “manually face and cancel the rejects,” the costs of this manual activity are recorded as manual operations. If you do not confirm, please explain.
- c. Please provide the MODS operation codes and the total and unit costs associated with these manual activities.
- d. In those facilities that “manually face and cancel the rejects,” what is the probability of being rejected again on a MLOCR/DIOSS?

OCA/USPS-T42-6. This interrogatory seeks information on the processing of “low aspect ratio” letter mail on mail processing equipment. Please refer to your testimony at pages 2-11, concerning the processing of letter-shaped mail. For purposes of this interrogatory, refer to the assumed mailpiece described in GCA/USPS-T42-1 (herein “low aspect ratio” mailpiece).

- a. Please provide the number of low aspect ratio mailpieces referenced above that are finalized for delivery in one sortation, i.e., one pass, or manual separation.
- b. Please provide the number of low aspect ratio mailpieces referenced above that are finalized for delivery in two sortations. What proportion of sorts for these low aspect ratio mailpieces are on automated processing equipment, and what proportion are manual processing?
- c. Please provide the number of low aspect ratio mailpieces referenced above that are finalized for delivery in three sortations. What proportion of sorts for these low aspect ratio mailpieces are on automated processing equipment, and what proportion are manual processing?
- d. Please provide the number of low aspect ratio mailpieces referenced above that are finalized for delivery in four sortations. What proportion of sorts for these low aspect ratio mailpieces are on automated processing equipment, and what proportion are manual processing?
- e. Please provide the number of low aspect ratio mailpieces referenced above that are finalized for delivery in five or more sortations. What proportion of sorts for these low aspect ratio mailpieces are on automated processing equipment, and what proportion are manual processing?
- f. With respect to subparts a.-e., above, what is the maximum number of sortations you are aware of that have been needed to finalize for delivery the low aspect ratio mailpieces referenced above.

- g. Please answer subparts a.-f., above, assuming the mailpiece described in GCA/USPS-T42-1 has an aspect ratio that exceeds 1:3, i.e., is a machinable letter.