

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOZZO,
USPS-T-12, TO FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE:
UPS/USPS-T12-47
(August 18, 2006)**

The United States Postal Service hereby provides the response of witness Bozzo (USPS-T-12) to the above-referenced interrogatory, filed on August 4, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 18, 2006

Response of United States Postal Service Witness Bozzo (USPS-T-12)
To Follow-Up Interrogatory of United Parcel Service

UPS/USPS-T12-47. Refer to your response to UPS/USPS-T12-38, in which you characterize the term “intermittent presence” as “vague.” To clarify, the word “gap” in the following questions refers to situations in which in your data at a particular site for a particular MODS operation: (1st) shows positive hours (“HRS”) and total piece handlings (“TPH”) in some time period; (2nd) has zero HRS and TPH in a subsequent period; and (3rd) is then followed by a later period showing positive HRS and TPH.

(a) You indicate in your response that “certain operations, particularly Priority Mail and parcel sorting, may only be present in some facilities at periods such as seasonal peaks.” Identify all of the MODS operations other than Priority Mail and parcel sorting that “may only be present in some facilities at [certain] periods.”

(b) Identify and explain in detail any reasons other than the need to accommodate seasonal peaks that might cause a MODS operation to shut down temporarily, creating a gap as defined above.

(c) Explain in detail how one might distinguish a gap created by the temporary shutdown of a MODS operation from a gap caused by a non-reporting or other data error.

Response.

a. The manual parcels, manual Priority Mail, and SPBS Priority Mail operations were the operations I had in mind in making the statement. Absence of the other operations at the cost pool level that I have studied for USPS-T-12 would not normally be due to seasonal factors.

b. My understanding is that operations may be relocated to other specialized facilities (e.g., L&DCs) or neighboring facilities and subsequently return temporarily or permanently. Also, facilities, or portions thereof, may be closed temporarily for construction or repair, leading to zero data for some or all operations.

c. Periodic presence of an operation, as in the response to UPS/USPS-T12-38, may be taken as signs of seasonal operations. Likewise, a case where the only gap as defined above is a single-period data dropout amid otherwise normal-

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looking data might be taken as a sign of a data error. In general, though, it would be necessary to obtain additional information to determine the exact situation, as in the responses to UPS/USPS-T12-38-40. Note also that non-reporting does not necessarily constitute a “data error.”

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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Frank R. Heselton

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Frank R. Heselton

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