

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

**Rate and Service Changes To Implement
Baseline Negotiated Service Agreement
With Bank of America Corporation**

Docket No. MC2007-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES OF
USPS WITNESS BRENT RANEY (APWU/USPS-ST3-1-8)
(May 9, 2007)**

Pursuant to Sections 25, 26, and 27 of the Rules of Practice, and Presiding Officer's Ruling MC2007-1/5, the American Postal Workers Union, AFL-CIO (APWU) directs the following interrogatories to USPS witness Brent Raney. 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
Jennifer L. Wood
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
Jwood@odsalaw.com

APWU/USPS-ST3-1

- a) Please describe the positions you have held with the Postal Service between 1998 and 2007.
- b) Please describe the responsibilities you had in those positions relating to the operation of bar code sorters or programs to improve read and accept rates on sorters

APWU/USPS-ST3-2

- a) Please list any software or hardware upgrades to bar code sorting equipment that took place between 1998 and 2007.
- b) Please list any upgrades that are planned during the period of this proposed agreement between the USPS and Bank of America.
- c) Please list your responsibilities related to any of the upgrades that are listed in section a) or b).
- d) Has the Postal Service initiated any other operational changes that have improved read/accept rates for bar code sorters during this period? If so, please describe them and their results.

APWU/USPS-ST3-3 Please examine the Library Reference USPS LR-K-68
"Acceptance Rate Study"

- a) On page 1 of the "study description" the acceptance rate is defined as the "percentage of mail that is finalized (i.e., is not rejected) in a given operation." Please provide your understanding of how this number would be calculated from the data requested.
- b) Could a letter be finalized, as defined in a) by reading information other than the bar code? If so, how? Could a letter be finalized despite an erroneous bar code or a code of less than eleven digits? If so, how?
- c) If a letter was finalized as discussed in b) would it be done on the first pass?
- d) Please provide a recent copy of a "Sort Plan Area Summary" End-Of-Run report for a comparable length of time as described on page 2 of LR-K-68. The location and identification of the plant can be redacted but please label and define all the items that show on that report and explain how you would use it to calculate the percentage of mail finalized.
- e) How frequently is a "Sort Plan Area Summary" End-Of-Run report produced?
- f) Are reports produced for each machine in a plant? Is there an overall summary for the plant produced?
- g) For what operational purposes does the Postal Service use the data generated in these End-Of-Run reports?

APWU/USPS-ST3-4 Please examine the following table, copied from Library Reference USPS LR-K-68 worksheet LR-K-68_Acceptsum.xls (adjusted volume).

ACCEPTANCE RATE SUMMARY

<u>Operation</u>	(1) AP 11 FY 99 <u>Pieces Fed</u>	(2) AP 11 FY 99 <u>Pieces Accepted</u>	(3) <u>Percent</u>
OSS	2,178,933,500		100.00%
Finalized		1,903,572,299	87.36%
ISS Refeeds		76,532,562	3.51%
OSS Refeeds		72,255,626	3.32%
LMLM		45,705,871	2.10%
Manual		80,867,141	3.71%
Out Prim Auto	1,177,032,600	1,127,172,586	95.76%
Out Sec Auto	1,032,933,700	993,288,566	96.16%
Inc MMP Auto	2,077,881,900	1,994,371,698	95.98%
Inc SCF/Prim Auto	3,437,204,400	3,320,253,420	96.60%
Inc Sec 1 Pass Auto	1,777,746,900	1,708,410,811	96.10%
Inc Sec 2 Pass Auto - Pass 1	4,112,282,600	4,013,996,506	97.61%
Inc Sec 2 Pass Auto - Pass 2	3,512,668,000	3,462,254,150	98.56%

(1) AP 11 FY 99 MODS Mail Volumes

(2) (1) * [(S1 Vol %) * (S1 Accept %) + (S2 Vol %) * (S2 Accept %) + (S3 Vol %) * (S3 Accept %)]

(3) (2) / (1)

For each item in the Operation column, please identify the machine that would be used for the operation and what type of mail would be fed to the machine.

APWU/USPS-ST3-5 Based on your experience, what is the current average acceptance rate for pre-barcoded letter mail on a delivery barcode sorter?

APWU/USPS-ST3-6 It is our understanding that the Board of Governors require periodic reporting from management on capital projects the Board approves and in such reporting, management must report on progress toward the improvement forecast in the DAR and in particular the ROI.

- a) Were you involved in developing any information for the following capital project proposals and DARs: Decision Analysis Report – Identification Code Sort (May 28, 1998); Decision Analysis Report – Delivery Bar Code Sorter Expanded Capability (May 26, 2000); Decision Analysis Report – Wide Area Bar Code Replacement (June 28, 2001)?
- b) Have you been involved in monitoring the implementation and the actual ROI for the projects listed in a)?
- c) Have you been involved in preparing management updates for the Board of Governors on these projects?
- d) Was there a Decision Analysis Report produced for the purchase of delivery bar code sorters approved by the Board of Governors at its May 2, 2007 meeting? If so, were you involved in preparing that DAR?

APWU/USPS-ST3-7 Has management reported any improvement in bar code read or accepts since 1999 to the Board of Governors? If so, what rates, for what type of mail and mail sorting operations have been reported?

APWU/USPS-ST3-8 How does management track read and accept rates? Are there operational goals for read and accept rates? If so, please describe them.