

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
Dec 10 2 09 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

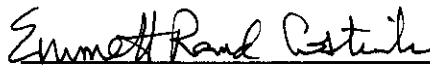
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS A. THOMAS BOZZO
(OCA/USPS-T14-1-8)
December 10, 2001

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-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,



SHELLEY S. DREIFUSS
Acting Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T14-1. Please refer to USPS-LR-J-56, and the Excel file: YRscrub.xls, and the spreadsheet entitled "table." Also, please refer to the testimony of witness Kingsley (USPS-T-39) at page 4, footnote 7. Please confirm that the MODS Productivity in the "TPF/Hour" column is calculated in the same manner as described in the testimony of witness Kingsley at page 4, footnote 7. If you do not confirm, please identify all differences and describe the reason for each difference. Please give a numeric example of how MODS Productivity is calculated in USPS-LR-56.

OCA/USPS-T14-2. For each of the 321 mail processing facilities listed in LR-J-56, file reg9300.xls, please identify which ones are

- a. P&DCs,
- b. P&DFs,
- c. CSUs,
- d. other (please identify each other type)?

OCA/USPS-T14-3. Please confirm that in your analysis, labor demands are estimated separately for each MODS cost pool and do not control for the workload in other cost pools, the amount of capital used specifically in that pool, the amount of capital used specifically in related cost pools, and whether the same plant performs some of the other cost pool activities. If you do not confirm, please explain and provide citations to your testimony or library reference.

OCA/USPS-T14-4. Please confirm that in your analysis, the separation of mechanized flat sorting and manual flat sorting into two different cost pools, 11 and 5 respectively, imposes the restriction that an increase in the plant's mechanized flat-sorting machine

capital stock will have the same effect on the demand for labor in the manual counterpart as *an increase of equal value in any other type of capital used in the plant.* If you do not confirm, please explain and provide citations to your testimony or library reference.

OCA/USPS-T14-5. Please confirm that your analysis does not recognize that the operations in different cost pools may be substitutes or complements for each other. If you do not confirm, please explain and provide citations to your testimony or library reference.

OCA/USPS-T14-6. Please confirm that the output of actual automated processing operations is a set of sorted pieces and a set of rejected pieces where the latter will need additional processing (in either automated or manual operations). If you do not confirm, please explain and provide citations to the testimony or library references of operations witnesses.

OCA/USPS-T14-7. Please provide a detailed description, including relevant formulas and price deflators, used to construct the capital variables QIAHE, QIMHE, QIPSE, QIBLD, QIPDBLD, and QICAP used in the labor demand study. Please identify which categories of capital equipment from the list in file PPAM.xls supplied in LR-J-161 are used in the construction of each capital variable.

OCA/USPS-T14-8. Using the list of plant capital equipment in the file PPAM.xls supplied in LR-J-161, please identify which items are utilized (physically) in each of your MODS cost pools

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.



Stephanie Wallace

Washington, D.C. 20268-0001
December 10, 2001