

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF OF  
ASSOCIATION FOR POSTAL COMMERCE  
REDIRECTED FROM WITNESS UNGER  
(PostCom/USPS-ST43-6 and 6(a))

The United States Postal Service hereby provides its responses to the following interrogatories of Association for Postal Commerce: PostCom/USPS-ST43-6 and 6(a), filed on April 21, 2000, and redirected from witness Unger.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

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May 5, 2000

Response of United States Postal Service  
To Interrogatory of Association for Postal Commerce  
(Redirected from Witness Unger, USPS-ST-43)

PostCom/USPS-ST-43-6. Page 2 of your testimony says: "My testimony addresses three specific issues: (1) the trend in Periodicals since 1993; (2) the trend in flats mail costs in FY 1998; and (3) the trend in flats productivity from 1995 to 1999." LR-I-107 provides productivities for FY 1998 for MODS operations. Please provide three updates to LR-I-107, Yrscrub.xls, worksheet "table" using data from the following periods: (1) FY 1999; (2) FY 1999, AP13; and (3) FY 2000, YTD. Please also answer the following questions about how MODS reports data for FSM 881s with both OCR and BCR capability and about the Baltimore AFSM 100 trial.

- a. How are TPH, TPF, and workhours for an FSM 881 with both BCR and OCR capability reported in the updated tables?

PostCom/USPS-ST-43-6 Response.

The requested tables are provided in the attachments to this response.

- a. TPH, TPF, and workhours for FSM 881 equipment with both BCR and OCR capability are reported in the "FSM 881 OCR" categories when the equipment is run in OCR, OCR-BCR, or BCR-OCR modes. TPH, TPF, and workhours for FSM 881 equipment with both BCR and OCR capability are reported in the "FSM 881 Keying" categories when the equipment is run in the manual (keying) mode. TPH, TPF, and workhours for FSM 881 equipment with both BCR and OCR capability are reported in the "FSM 881 BCR" categories when the equipment is run in the BCR mode (if any; please see also Witness Unger's response to PostCom/USPS-ST-43-6, part b).

**MODS Productivities for PFY 1999**  
**Excluding Top and Bottom 1% Productivity Ratios Over All APs**  
**TPF and TPH are in Thousands**

<b>Group</b>	<b>Description</b>	<b>Number of Observations</b>	<b>Total TPF</b>	<b>Total TPH</b>	<b>Total Hours</b>	<b>TPF/Hour</b>	<b>TPH/TPF</b>
1	FSM 881 Keying -- Outgoing	2,750	2,982,342	2,975,651	5,271,898	566	0.998
2	FSM 881 Keying -- ADC	1,218	1,414,552	1,404,716	3,453,953	410	0.993
3	FSM 881 Keying -- Incoming Primary	2,842	2,211,330	2,196,796	4,727,214	468	0.993
4	FSM 881 Keying -- Incoming Secondary	2,323	1,160,262	1,148,714	2,896,498	401	0.990
5	FSM 881 BCR -- Outgoing	351	44,386	40,624	50,066	887	0.915
6	FSM 881 BCR -- ADC	347	122,205	110,193	112,720	1,084	0.902
7	FSM 881 BCR -- Incoming Primary	1,601	867,077	801,380	922,586	940	0.924
8	FSM 881 BCR -- Incoming Secondary	1,846	1,783,530	1,660,687	2,338,920	763	0.931
9	FSM 1000 Keying -- Outgoing	2,260	1,703,272	1,674,020	2,946,127	578	0.983
10	FSM 1000 Keying -- ADC	1,118	1,366,431	1,340,166	2,531,847	540	0.981
11	FSM 1000 Keying -- Incoming Primary	2,321	2,472,364	2,426,405	4,123,359	600	0.981
12	FSM 1000 Keying -- Incoming Secondary	1,343	456,076	446,977	632,167	721	0.980
13	FSM 1000 BCR -- Outgoing	99	14,511	13,618	18,278	794	0.938
14	FSM 1000 BCR -- ADC	196	23,881	19,933	17,730	1,347	0.835
15	FSM 1000 BCR -- Incoming Primary	711	110,972	95,115	101,193	1,097	0.857
16	FSM 1000 BCR -- Incoming Secondary	659	103,716	86,728	80,236	1,293	0.836
17	Manual Flat -- Outgoing	3,177	468,135	468,135	1,207,727	388	1.000
18	Manual Flat -- Managed Mail (ADC)	728	125,728	125,728	366,788	343	1.000
19	Manual Flat -- Incoming Primary	3,677	1,823,694	1,823,694	3,958,826	461	1.000
20	Manual Flat -- Incoming Secondary	3,552	3,838,663	3,838,663	9,857,249	389	1.000
21	FSM 881 OCR -- Outgoing	1,326	1,211,544	999,474	1,231,548	984	0.825
22	FSM 881 OCR -- ADC	784	1,133,559	943,436	1,462,780	775	0.832
23	FSM 881 OCR -- Incoming Primary	1,509	1,558,830	1,376,199	2,050,895	760	0.883
24	FSM 881 OCR -- Incoming Secondary	1,551	2,368,000	2,158,570	3,121,606	759	0.912
25	Manual Parcels -- Incoming	2,333	310,661	310,661	1,465,423	212	1.000
26	Outgoing MLOCR/ISS	3,361	27,455,032	20,483,130	4,266,140	6,436	0.746

**MODS Productivities for PFY 1999**  
**Excluding Top and Bottom 1% Productivity Ratios Over All APs**  
**TPF and TPH are in Thousands**

<u>Group</u>	<u>Description</u>	<u>Number of Observations</u>	<u>Total TPF</u>	<u>Total TPH</u>	<u>Total Hours</u>	<u>TPF/Hour</u>	<u>TPH/TPF</u>
27	Incoming MLOCR/ISS	2,899	9,074,026	7,175,475	2,429,919	3,734	0.791
28	Outgoing BCS/OSS	3,232	25,521,272	24,612,449	2,948,843	8,655	0.964
29	Incoming BCS/OSS	2,454	6,044,617	5,764,384	759,525	7,958	0.954
30	RBCS Keying	652	11,385,928	11,385,928	16,802,566	678	1.000
31	LMLM	2,252	2,725,739	2,722,801	704,134	3,871	0.999
32	BCS - Outgoing primary	3,396	17,011,980	16,237,733	3,234,602	5,259	0.955
33	BCS - Outgoing secondary	2,558	14,626,431	14,050,199	1,845,831	7,924	0.961
34	BCS - MMP	1,520	29,249,651	28,113,756	5,317,714	5,500	0.961
35	BCS - Incoming Primary	3,500	49,055,581	47,149,627	8,454,799	5,802	0.961
36	BCS - Incoming Secondary	3,528	28,904,101	27,791,441	5,424,086	5,329	0.962
37	BCS - DPS	3,819	105,646,343	99,887,721	11,664,907	9,057	0.946
38	CSBCS - DPS	271	2,886,811	2,856,905	177,974	16,220	0.990
39	Manual Letter -- Outgoing Primary	3,798	6,742,365	6,742,365	15,388,959	438	1.000
40	Manual Letter -- Outgoing Secondary	3,073	1,292,293	1,292,293	3,238,426	399	1.000
41	Manual Letter -- MMP	1,182	2,343,342	2,343,342	4,912,865	477	1.000
42	Manual Letter -- Incoming Primary	3,867	7,685,571	7,685,559	14,672,382	524	1.000
43	Manual Letter -- Incoming Secondary	3,626	6,900,498	6,900,498	16,083,302	429	1.000
44	Box Section -- Station/Branch	712	2,283,929	2,283,929	2,236,255	1,021	1.000

**MODS Productivities for AP 13 1999**  
**Excluding Top and Bottom 1% Productivity Ratios Over All APs**  
**TPF and TPH are in Thousands**

<b>Group</b>	<b>Description</b>	<b>Number of Observations</b>	<b>Total TPF</b>	<b>Total TPH</b>	<b>Total Hours</b>	<b>TPF/Hour</b>	<b>TPH/TPF</b>
1	FSM 881 Keying -- Outgoing	199	165,818	165,238	317,379	522	0.997
2	FSM 881 Keying -- ADC	91	70,778	70,017	206,068	343	0.989
3	FSM 881 Keying -- Incoming Primary	209	127,311	120,451	265,953	479	0.946
4	FSM 881 Keying -- Incoming Secondary	165	59,718	53,041	163,693	365	0.888
5	FSM 881 BCR -- Outgoing	2	162	149	104	1,559	0.920
6	FSM 881 BCR -- ADC	4	1,714	1,525	2,166	791	0.890
7	FSM 881 BCR -- Incoming Primary	26	10,084	9,287	11,229	898	0.921
8	FSM 881 BCR -- Incoming Secondary	36	22,270	20,905	26,616	837	0.939
9	FSM 1000 Keying -- Outgoing	175	134,020	131,556	228,647	586	0.982
10	FSM 1000 Keying -- ADC	87	110,131	107,662	203,758	541	0.978
11	FSM 1000 Keying -- Incoming Primary	180	193,900	190,084	330,254	587	0.980
12	FSM 1000 Keying -- Incoming Secondary	99	32,730	31,962	48,610	673	0.977
13	FSM 1000 BCR -- Outgoing	9	1,223	1,168	2,184	560	0.955
14	FSM 1000 BCR -- ADC	19	3,254	2,741	1,791	1,817	0.842
15	FSM 1000 BCR -- Incoming Primary	71	11,519	9,628	11,710	984	0.836
16	FSM 1000 BCR -- Incoming Secondary	74	16,759	13,904	14,369	1,166	0.830
17	Manual Flat -- Outgoing	223	34,170	34,170	81,511	419	1.000
18	Manual Flat -- Managed Mail (ADC)	47	8,705	8,705	24,417	356	1.000
19	Manual Flat -- Incoming Primary	271	131,012	131,012	267,120	490	1.000
20	Manual Flat -- Incoming Secondary	262	279,286	279,286	690,492	404	1.000
21	FSM 881 OCR -- Outgoing	164	135,806	111,721	155,298	874	0.823
22	FSM 881 OCR -- ADC	86	120,188	99,728	182,085	660	0.830
23	FSM 881 OCR -- Incoming Primary	195	208,643	185,287	285,851	730	0.888
24	FSM 881 OCR -- Incoming Secondary	204	334,392	294,725	474,072	705	0.881
25	Manual Parcels -- Incoming	167	20,981	20,981	95,829	219	1.000
26	Outgoing MLOCR/ISS	258	1,937,264	1,471,594	315,059	6,149	0.760

**MODS Productivities for AP 13 1999**  
**Excluding Top and Bottom 1% Productivity Ratios Over All APs**  
**TPF and TPH are in Thousands**

<u>Group</u>	<u>Description</u>	<u>Number of Observations</u>	<u>Total TPF</u>	<u>Total TPH</u>	<u>Total Hours</u>	<u>TPF/Hour</u>	<u>TPH/TPF</u>
27	Incoming MLOCR/ISS	220	604,240	477,881	164,556	3,672	0.791
28	Outgoing BCS/OSS	248	1,700,652	1,638,585	195,214	8,712	0.964
29	Incoming BCS/OSS	171	427,840	408,138	51,623	8,288	0.954
30	RBCS Keying	42	569,886	569,886	790,570	721	1.000
31	LMLM	172	199,450	199,450	52,718	3,783	1.000
32	BCS - Outgoing primary	255	1,211,440	1,154,388	234,457	5,167	0.953
33	BCS - Outgoing secondary	200	1,000,487	960,116	132,587	7,546	0.960
34	BCS - MMP	117	2,053,474	1,974,524	391,540	5,245	0.962
35	BCS - Incoming Primary	265	3,484,605	3,347,755	602,457	5,784	0.961
36	BCS - Incoming Secondary	263	2,031,628	1,953,985	394,970	5,144	0.962
37	BCS - DPS	285	7,641,552	7,507,019	889,047	8,595	0.982
38	CSBCS - DPS	18	170,980	169,283	11,484	14,889	0.990
39	Manual Letter -- Outgoing Primary	288	463,265	463,265	1,018,319	455	1.000
40	Manual Letter -- Outgoing Secondary	232	94,562	94,562	214,982	440	1.000
41	Manual Letter -- MMP	92	160,944	160,944	324,303	496	1.000
42	Manual Letter -- Incoming Primary	289	536,193	536,193	974,531	550	1.000
43	Manual Letter -- Incoming Secondary	270	478,793	478,793	1,090,256	439	1.000
44	Box Section -- Station/Branch	53	166,472	166,472	168,977	985	1.000

**MODS Productivities for YTD AP 08 2000**  
**Excluding Top and Bottom 1% Productivity Ratios Over All APs**  
**TPF and TPH are in Thousands**

<u>Group</u>	<u>Description</u>	<u>Number of Observations</u>	<u>Total TPF</u>	<u>Total TPH</u>	<u>Total Hours</u>	<u>TPF/Hour</u>	<u>TPH/TPF</u>
1	FSM 881 Keying -- Outgoing	1,632	1,474,289	1,467,175	2,639,520	559	0.995
2	FSM 881 Keying -- ADC	722	581,596	575,607	1,554,229	374	0.990
3	FSM 881 Keying -- Incoming Primary	1,675	1,093,342	1,087,398	2,074,483	527	0.995
4	FSM 881 Keying -- Incoming Secondary	1,260	462,264	459,137	1,158,282	399	0.993
5	FSM 881 BCR -- Outgoing	25	3,084	2,944	1,743	1,769	0.955
6	FSM 881 BCR -- ADC	28	12,474	10,901	13,957	894	0.874
7	FSM 881 BCR -- Incoming Primary	98	55,038	51,058	41,472	1,327	0.928
8	FSM 881 BCR -- Incoming Secondary	182	114,140	105,709	137,838	828	0.926
9	FSM 1000 Keying -- Outgoing	1,432	1,164,333	1,136,745	1,929,747	603	0.976
10	FSM 1000 Keying -- ADC	678	937,721	894,425	1,770,865	530	0.954
11	FSM 1000 Keying -- Incoming Primary	1,436	1,619,501	1,584,664	2,844,493	569	0.979
12	FSM 1000 Keying -- Incoming Secondary	767	247,448	241,637	377,470	656	0.977
13	FSM 1000 BCR -- Outgoing	72	7,254	6,815	23,695	306	0.940
14	FSM 1000 BCR -- ADC	137	18,670	15,794	14,264	1,309	0.846
15	FSM 1000 BCR -- Incoming Primary	527	94,439	80,186	78,574	1,202	0.849
16	FSM 1000 BCR -- Incoming Secondary	602	138,654	116,063	109,861	1,262	0.837
17	Manual Flat -- Outgoing	1,903	323,270	323,270	757,211	427	1.000
18	Manual Flat -- Managed Mail (ADC)	413	93,214	93,214	231,852	402	1.000
19	Manual Flat -- Incoming Primary	2,208	1,164,384	1,164,384	2,414,237	482	1.000
20	Manual Flat -- Incoming Secondary	2,120	2,557,309	2,557,309	6,147,552	416	1.000
21	FSM 881 OCR -- Outgoing	1,340	1,177,028	954,000	1,366,822	861	0.811
22	FSM 881 OCR -- ADC	720	1,153,203	934,471	1,697,595	679	0.810
23	FSM 881 OCR -- Incoming Primary	1,659	1,875,106	1,641,427	2,589,130	724	0.875
24	FSM 881 OCR -- Incoming Secondary	1,739	3,047,604	2,633,415	4,266,803	714	0.864
25	Manual Parcels -- Incoming	1,378	206,901	206,901	949,244	218	1.000
26	Outgoing MLOCR/ISS	2,092	16,512,438	12,050,461	2,659,796	6,208	0.730

**MODS Productivities for YTD AP 08 2000**  
**Excluding Top and Bottom 1% Productivity Ratios Over All APs**  
**TPF and TPH are in Thousands**

<u>Group</u>	<u>Description</u>	<u>Number of Observations</u>	<u>Total TPF</u>	<u>Total TPH</u>	<u>Total Hours</u>	<u>TPF/Hour</u>	<u>TPH/TPF</u>
27	Incoming MLOCR/ISS	1,774	5,264,076	3,888,382	1,440,740	3,654	0.739
28	Outgoing BCS/OSS	2,024	17,641,436	14,831,557	1,895,426	9,307	0.841
29	Incoming BCS/OSS	1,429	3,778,639	3,231,037	434,122	8,704	0.855
30	RBCS Keying	334	5,345,883	5,345,883	7,787,717	686	1.000
31	LMLM	1,489	1,801,357	1,792,912	472,278	3,814	0.995
32	BCS - Outgoing primary	2,000	10,162,056	9,655,202	1,853,662	5,482	0.950
33	BCS - Outgoing secondary	1,551	8,235,569	7,896,098	1,023,305	8,048	0.959
34	BCS - MMP	971	18,363,401	17,625,307	3,449,529	5,323	0.960
35	BCS - Incoming Primary	2,126	30,761,591	29,535,714	5,145,624	5,978	0.960
36	BCS - Incoming Secondary	2,161	18,800,471	18,025,645	3,480,504	5,402	0.959
37	BCS - DPS	2,336	72,772,616	71,256,528	7,945,474	9,159	0.979
38	CSBCS - DPS	151	1,647,938	1,625,057	99,132	16,624	0.986
39	Manual Letter -- Outgoing Primary	2,338	4,172,989	4,172,989	9,071,673	460	1.000
40	Manual Letter -- Outgoing Secondary	1,886	890,789	890,789	1,925,438	463	1.000
41	Manual Letter -- MMP	744	1,452,138	1,452,138	2,867,889	506	1.000
42	Manual Letter -- Incoming Primary	2,352	4,631,338	4,631,338	8,513,486	544	1.000
43	Manual Letter -- Incoming Secondary	2,146	4,214,391	4,214,391	9,049,666	466	1.000
44	Box Section -- Station/Branch	415	1,478,370	1,478,370	1,327,006	1,114	1.000



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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May 5, 2000