

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS DEGEN TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS MODEN  
(OCA/USPS-T4-19)

The United States Postal Service hereby provides the response of witness Degen to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T4-19, filed on September 5, 1997, and redirected from witness Moden.

The 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

  
\_\_\_\_\_  
Eric P. Koetting

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(202) 268-2992; Fax -5402  
September 19, 1997

**Response of United States Postal Service Witness Degen  
to Interrogatories of the Office of the Consumer Advocate  
(Redirected from Witness Moden)**

OCA/USPS-T4-19. Please provide MODS volume or piece handling counts for FY 1996 by CAG for each of the MODS cost pools. Please break this information out by the method used to collect these piece counts (SWS, actual counts, etc.).

OCA/USPS-T4-19 Response.

Attachments 1 and 2 to this response contain the requested breakdown of MODS TPH for the 11 cost pools associated with the MODS sorting activities listed in Table 7 of witness Bradley's testimony, USPS-T-14. The TPH are from the modtph96.dat file in LR-H-248, and have not been scrubbed. The data are not broken out by collection method because the required information is not available. However, TPH in mechanized and automated operations is generally derived from machine counts, whereas TPH in manual operations is generally based on converted weights or other such measurements. Please note that there are volumes recorded in the TPH variable for various non-distribution operations at some facilities. I am informed that in such cases, the TPH variable contains volume measures defined at the area or facility level. The local volume measures are not piece counts in any meaningful sense and cannot be aggregated to servicewide cost pools, so they are not reported in the attachments.

FY96 MODS TPH (000) by Cost Pool and CAG

LDC	Pool	A	B	C	D	E	Total
11	ocr	40,244,181	74,598	424,221	91,773	0	40,834,772
11	bcs	205,781,197	256,465	2,873,037	681,288	0	209,591,886
12	ism	27,963,141	121,570	765,164	116,296	0	28,866,171
12	ism	17,244,799	24,487	57,341	0	0	17,326,627
13	spts Oth	1,862,920	0	8	447	0	1,863,375
13	sptsPrio	625,445	32	0	0	0	625,477
14	mant	29,264,515	63,790	922,448	380,155	81,177	30,742,085
14	mant	9,183,920	41,262	582,078	174,524	8,296	10,001,079
14	manp	538,215	7,684	62,898	18,732	349	627,978
14	Priority	2,136,217	2,306	19,841	7,717	0	2,166,081
17	1cancMPP	55,475,790	109,306	762,896	169,014	14,421	56,531,427
	Total	390,450,338	701,499	6,470,032	1,639,946	115,243	399,377,058

FY96 MODS TPH (000) by Cost Pool, MODS Code and CAG

LDC	Pool	MODS Code	A	B	C	D	E	Total	Pool Total
11	ocr	831	7,570,063	0	68,500	0	0	7,638,563	0
11	ocr	832	165,232	0	11	0	0	165,243	0
11	ocr	833	1,181,730	0	0	0	0	1,181,730	0
11	ocr	834	3,520,571	0	36,563	0	0	3,557,134	0
11	ocr	835	1,715,162	0	1,091	0	0	1,716,252	0
11	ocr	836	1,875,805	0	276	0	0	1,876,081	0
11	ocr	837	229,114	0	92	0	0	229,206	0
11	ocr	841	123,439	21,544	113,322	13,897	0	272,202	0
11	ocr	842	13,259	0	429	0	0	13,688	0
11	ocr	843	0	0	31	0	0	31	0
11	ocr	844	21,453	0	15,389	8,413	0	45,255	0
11	ocr	845	6,492	26,704	15,106	1,277	0	49,579	0
11	ocr	846	0	0	0	939	0	939	0
11	ocr	851	119,514	25,093	136,640	46,508	0	327,755	0
11	ocr	852	6,277	0	0	1,482	0	7,759	0
11	ocr	853	65,015	0	2,026	0	0	67,041	0
11	ocr	854	10,016	1,257	15,109	14,068	0	40,450	0
11	ocr	855	97	0	17,350	3,847	0	21,294	0
11	ocr	856	0	0	2,287	1,341	0	3,628	0
11	ocr	881	13,220,048	0	0	0	0	13,220,048	0
11	ocr	882	129,323	0	0	0	0	129,323	0
11	ocr	883	4,149,813	0	0	0	0	4,149,813	0
11	ocr	884	3,604,120	0	0	0	0	3,604,120	0
11	ocr	885	2,484,816	0	0	0	0	2,484,816	0
11	ocr	886	6,477	0	0	0	0	6,477	0
11	ocr	887	26,344	0	0	0	0	26,344	0
11	ocr	861	10	0	0	4,178	0	4,188	0
11	ocr	862	24,661	0	0	0	0	24,661	0
11	ocr	863	2,099	0	0	0	0	2,099	0
11	ocr	864	47,333	0	0	25,547	0	72,880	0
11	ocr	865	59,574	0	4,182	7,261	0	71,017	0
11	ocr	866	365,533	0	1,571	0	0	367,104	0
11	ocr	867	86,662	0	1,034	0	0	87,696	0



12	ISM	081	16,183,112	62,595	250,988	0	0	16,496,694
12	ISM	082	421,796	108	0	0	0	421,904
12	ISM	083	2,947,079	0	0	0	0	2,947,079
12	ISM	084	2,569,707	14,899	30,581	0	0	2,615,187
12	ISM	085	1,016,983	2	30,514	0	0	1,047,499
12	ISM	086	4,289,375	43,967	83,510	0	0	4,416,852
12	ISM	087	414,159	0	0	0	0	414,159
12	ISM	088	73	0	0	0	0	73
12	ISM	089	167	0	0	0	0	167
12	ISM	091	64,943	0	196,356	67,911	0	329,210
12	ISM	093	16,925	0	0	0	0	16,925
12	ISM	094	10,249	0	52,560	16,701	0	79,510
12	ISM	095	6,817	0	29,781	0	0	36,598
12	ISM	096	18,780	0	87,258	31,684	0	137,722
12	ISM	097	2,976	0	3,616	0	0	6,592
12	ISM	141	3,993,345	5,736	8,214	0	0	4,007,296
12	ISM	142	691,322	0	0	0	0	691,322
12	ISM	143	2,607,229	2	0	0	0	2,607,231
12	ISM	144	2,877,415	10,064	17,421	0	0	2,904,899
12	ISM	145	1,100,596	0	6	0	0	1,100,602
12	ISM	146	2,383,263	3,474	8,735	0	0	2,395,472
12	ISM	147	85,673	0	1,009	0	0	86,682
12	ISM	148	233,369	0	0	0	0	233,369
12	ISM	441	214	0	0	0	0	214
12	ISM	442	38	0	0	0	0	38
12	ISM	443	60	0	0	0	0	60
12	ISM	444	1,889	0	0	0	0	1,889
12	ISM	961	85,086	0	0	0	0	85,086
12	ISM	962	14,372	0	234	0	0	14,606
12	ISM	963	113,502	0	25	0	0	113,527
12	ISM	964	729,240	2,870	6,747	0	0	738,857
12	ISM	965	220,333	1,135	13	0	0	221,482
12	ISM	966	2,105,670	1,205	14,938	0	0	2,121,813
12	ISM	967	2,184	0	0	0	0	2,184
13	SPBS OTH	134	391,097	0	0	0	0	391,097
13	SPBS OTH	135	274,042	0	0	447	0	274,489
13	SPBS OTH	136	462,993	0	8	0	0	463,001
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12	ISM	17,326,627	17,326,627	0	0	0	0	17,326,627

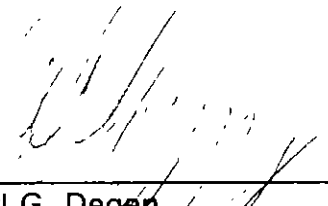
13	spbs Oth	137	834,788	0	0	0	834,788	1,963,375
13	spbsPno	138	355,485	0	0	0	355,485	
13	spbsPno	139	269,960	32	0	0	269,992	625,477
14	manf	029	344,792	955	72	0	345,819	
14	manf	030	6,127,324	5,439	195,525	108,259	6,462,976	
14	manf	040	1,124,093	47	11,435	7,095	1,142,670	
14	manf	043	2,058,698	0	1,631	639	2,060,969	
14	manf	044	4,096,686	8,949	263,808	120,030	4,548,062	
14	manf	045	1,007,102	0	12,775	15,106	1,034,983	
14	manf	150	2,783,895	19,132	87,103	6,159	2,896,289	
14	manf	151	0	0	1,280	0	1,280	
14	manf	152	0	0	264	0	264	
14	manf	153	0	0	1,033	0	1,033	
14	manf	155	89	0	0	0	89	
14	manf	160	10,457,699	26,468	309,399	118,533	10,912,099	
14	manf	165	16	0	0	0	16	
14	manf	168	778,363	5	22,898	9,767	811,033	
14	manf	169	505,758	2,796	15,225	726	524,505	30,742,085
14	manf	060	780,795	6,671	54,548	17,210	860,813	
14	manf	069	39,537	0	0	0	39,537	
14	manf	070	230,438	0	3,008	130	233,576	
14	manf	073	464,469	0	84	79	464,632	
14	manf	074	1,705,881	3,620	226,551	73,888	2,015,893	
14	manf	075	343,572	-2	9,373	15,122	368,065	
14	manf	170	1,098,675	16,196	93,270	3,310	1,213,204	
14	manf	171	24	0	1,513	0	1,537	
14	manf	172	0	0	560	0	560	
14	manf	173	26	0	1,246	0	1,272	
14	manf	174	14	0	0	0	14	
14	manf	175	4,230,718	14,777	179,549	62,226	4,487,270	
14	manf	176	3	0	0	0	3	
14	manf	178	222,087	1	5,573	2,558	230,219	
14	manf	179	77,682	0	6,804	0	84,486	10,001,079
14	manp	100	177,054	0	17,847	12,265	207,299	
14	manp	130	73,994	1	15,495	2,368	91,858	
14	manp	200	287,166	7,683	29,657	4,099	328,821	627,978
14	Priority	050	1,341,131	2,070	17,727	7,717	1,368,645	

14	Priority	055	795,086	236	2,114	0	797,436	0	2,166,081
17	1cancMPP	010	695,589	1	18,343	0	713,933	0	
17	1cancMPP	011	2,367,020	33,299	406,533	101,377	2,908,228	0	
17	1cancMPP	012	104,204	0	25,667	0	129,871	0	
17	1cancMPP	013	592,104	0	165,300	46,577	803,981	0	
17	1cancMPP	014	837,478	244	35,321	20,511	907,975	14,421	
17	1cancMPP	015	28,795,143	38,702	76,611	0	28,910,456	0	
17	1cancMPP	016	36,044	0	1,155	129	37,329	0	
17	1cancMPP	020	9,026,737	37,061	33,964	419	9,098,181	0	
17	1cancMPP	021	117,432	0	0	0	117,432	0	
17	1cancMPP	022	20,474	0	0	0	20,474	0	
17	1cancMPP	023	4	0	0	0	4	0	
17	1cancMPP	020B	12,883,562	0	2	0	12,883,565	0	56,531,427
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Total			390,450,338	701,499	6,470,032	1,639,946	115,243	399,377,058	399,377,058



**DECLARATION**

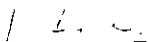
I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Carl G. Degen

Date: \_\_\_\_\_

## 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.

  
\_\_\_\_\_  
Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
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September 19, 1997