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

POSTAL RATE AND FEE CHANGES, 2000 | Docket No. R2000–1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF KEYSPAN ENERGY (KE/USPS–T10–1-4)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of KeySpan Energy: KE/USPS–T10-1-4, filed on February 14, 2000. It should be noted that interrogatory KE/USPS-T10-4 as written contained only subparts (d) and (e), but no subparts (a) through (c). Accordingly, responses are provided and numbered as KE/USPS-T10-4 (d) and (e).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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February 28, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF KEYSPAN ENERGY

KE/USPS-T10-1 On page 2 of your prepared testimony you note that the Advanced Facer Canceller System culls out nonletter-sized pieces over 6 1/8 inches tall, over ¼ inch thick or over 11 ½ inches long. Is there a weight limitation above which a standard size letter will be culled out? If so, what is that weight limitation and how was it determined?

Response:

No. The AFCS does not have a mechanism to weigh pieces.

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KE/USPS-T10-2 In your description of the Remote Bar Coding System on page 5 of your prepared testimony, you mention that the address is resolved to the depth of sort required, either 5, 9 or 11 digits.

(a) What are the circumstances under which the 5, 9 and 11 digit depths of sort are required?

(b) If only a 5 or 9 digit zip code is required and the letter is barcoded as such, how are the letters eventually sorted to carrier sequence in the delivery office?

Response:

(a) Eleven digits are required to sort into walk sequence for most residential addresses (the ZIP+4 and the last two digits of the address). Nine digit unique codes are usually assigned to firms or buildings, business reply mail, and PO Boxes. In these cases, a sort to the 9-digit level is the finest depth of sort necessary for delivery since it is delivery point specific. In other cases, firms which receive large volumes of mail, are assigned unique 5-digit ZIP Codes. In these situations, a 5-digit sort is the finest depth of sort required for delivery.

(b) If 5-digits is the finest depth of code required, mail can be sorted on automation to 5-digits, and no carrier sequencing is required. A unique 9-digit code, which is specific to a single delivery point, can be sequenced on automation in with the 11-digit encoded letters. If the mail requires an 11-digit code and receives only a 5 or 9-digit code, the sort plan can sort out the 5-digit volume into one hold out and the 9-digit volume into carrier route. These letters subsequently will be sorted manually by the carrier in the office into walk sequence.

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KE/USPS-T10-3 On pages 5 and 6 of your prepared testimony you describe a Delivery Bar Code Sorter (DBCS) and a Carrier Sequence Bar Code Sorter (CSBCS).

(a) What is the current cost for the Postal Service to employ such a machine at a facility which has no such equipment deployed?

(b) If a recipient with its own unique 11-digit zip code consistently receives 5,000 or more letters per day, how likely is it that such mail would be separated to the final addressee in the incoming secondary sortation?

(c) What volume to a specific addressee is generally necessary in order to have a bin specified for that addressee in the incoming secondary sortation?

Response:

(a) I assume you are requesting the cost of a DBCS and a CSBCS. The last purchase of DBCSs was in 1999 at a cost of $250,000 per machine and CSBCSs was in 1997 at a cost of $64,000 per machine.

(b) Very likely.

(c) The minimum volume necessary can vary depending on the volume characteristics of the destinating facility. For example, the minimum volume to justify a bin on incoming secondary in Everett WA is likely to be less than in New York City. The minimum could be as little as 1,000 pieces per day on average.

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KE/USPS-T10-4 On page 6 of your testimony you describe the Mail Processing Bar Code Sorter (MPBCS), which has 96 bins and is used primarily for the outgoing primary and incoming primary operations.

(d) If a recipient with its own unique 11-digit zip consistently receives 5,000 or more letters per day, how likely is it that such mail would be separated to the final addressee in the incoming primary sortation?

(e) What volume to a specific addressee is generally necessary in order to have a bin specified for that addressee in the incoming primary sortation?

Response:

(no a.-c.)

(d) Not likely. Depends on densities and destination similar to KE/USPS-T10-3(c).

(e) Generally, 20,000 pieces per day on average. Incoming primary is sorted on multiple machines within a plant, unlike incoming secondary for a zone, which is sorted on a single machine. Therefore, a higher volume is necessary to justify the holdout since the volume is spread across multiple machines, especially in larger metropolitan areas.

DECLARATION

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

Linda A. Kingsley

Date: 2/28/00

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.

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