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

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POSTAL REGULATORY
OFFICE OF THE ATTORNEY GENERAL

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T10-7-8)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of United Parcel Service: UPS/USPS-T10-7-8, filed on February 16, 2000.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
March 1, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF THE UNITED PARCEL SERVICE**

UPS/USPS-T10-7. (a) Describe what postal personnel are instructed to do when a mailer presents a Parcel Post DBMC, DSCF, or DDU mailing at a postal facility, including a description of all acceptance activities performed by the Postal Service, and provide copies of any and all procedures, manuals, guidelines, instructions, directives, or other documents concerning the acceptance of Parcel Post DBMC, DSCF, or DDU mailings.

(b) Describe what steps postal personnel take to verify the accuracy of a mailing statement prepared by the mailer when a mailer presents a Parcel Post DBMC, DSCF, or DDU mailing at a postal facility, and provide copies of any and all procedures, manuals, guidelines, instructions, directives, or other documents concerning the verification of the accuracy of the mailing statement, including the verification of the volume information (pieces and weight) indicated on the mailing

(c) Describe what quality control measures, including any periodic audits or inspections, the Postal Service takes to ensure that postal employees are properly accepting Parcel Post DBMC, DSCF, and DDU mailings and properly verifying the information on the mailing statement, and provide copies of any and all procedures, manuals, guidelines, instructions, directives, or other documents concerning such quality control measures.

Response:

- a. Refer to USPS-LR-I-176.
- b. Refer to USPS-LR-I-213 and USPS-LR-I-176.
- c. Refer to Chapter 3 of DM – 109 contained in USPS-LR-I-213.

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UPS/USPS-T10-8. Please refer to the answer to interrogatory DFC/USPS-3. Attached to that answer is a copy of a 1998 memorandum which contains "Sunday Collection and Outgoing Mail Processing Guidelines."

- (a) Are the policies and practices established in those Guidelines still in effect?
- (b) List all operations that are conducted on Sundays and indicate in the case of each operation the class or classes of mail for which those operations are conducted.
- (c) Are postal personnel paid more for working on Sundays than for working on other days? If so, indicate the premium or premiums the Postal Service pays its personnel who work on Sundays.
- (d) Are the costs of Sunday operations accounted for separately from the costs incurred on other days of the week? If so, identify all accounts in which such costs are recorded and the BY 1998 costs in each such account.

Response:

- a. Please note that the memorandum to which this question refers was issued in 1988, not 1998. I am told that these guidelines are still in effect with the following modifications:
- Domestic Special Delivery service was terminated.
 - State Distribution Centers were eliminated and replaced with Area Distribution Centers and labeling lists changed accordingly.
 - The reference to drop shipped newspapers should be changed to drop shipped periodicals.
 - The reference to AMF should be changed to AMF/AMC.
 - The reference to parcel post should be changed to Standard (B).

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- The reference to Bulk Mail Acceptance Unit should be changed to Bulk Mail Entry Unit.
 - The reference to Regional Director, Operations Support should be changed to Area Manager, Operations Support
- b. I am told that the requested information can be found in LR-I-106, Part V, Tables V-3C and V-3D.
- c. Yes, the premium is 25%.
- d. No, I am told that the costs of Sunday operations are not accounted for separately. However, the Sunday premium, by itself, is accounted for separately. See Worksheet 3.0.13, Premium Cost Calculation, in the B work papers of witness Meehan (T11), or LR-I-80 for an electronic version.

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: 2-29-00

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.



Susan M. Duchek

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