

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2000

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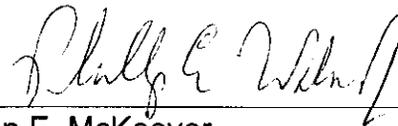
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INTERROGATORIES FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS KINGSLEY  
(UPS/USPS-T10-10 through 14)  
(March 6, 2000)

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Kingsley: UPS/USPS-T10-10 through 14.

Respectfully submitted,



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John E. McKeever  
William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP  
3400 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2762  
(215) 656-3310  
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW  
Washington, DC 20036-2430  
(202) 861-3900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY

UPS/USPS-T10-10. At various points in your testimony, you use the terms “primary” processing and “secondary” processing. See, e.g., Direct Testimony, at 5, 15, 33. Provide precise operational definitions of these terms. If the definitions vary from one relevant context to another, provide definitions for each relevant context.

UPS/USPS-T10-11. Refer to pages 3 through 7 of your testimony, where you describe the following mail processing equipment: (i) Advanced Facer Cancellor System (AFCS); (ii) Letter Sorting Machine (LSM); (iii) Multiline Optical Character Reader (MLOCR); (iv) Low Cost MLOCR; (v) Remote Barcoding System (RBCS); (vi) Delivery Barcode Sorter (DBCS); (vii) Carrier Sequence Barcode Sorter (CSBCS); (viii) Mail Processing Barcode Sorter (MPBCS); (ix) Letter Mail Labeling Machine (LMLM); (x) ID Code Sortation (ICS); and (xi) Tabbng Equipment.

(a) Indicate whether each piece of equipment is used in MODS facilities or only in other types of facilities.

(b) If it is used in MODS facilities, indicate whether it is used in all MODS facilities, most MODS facilities, or only a few MODS facilities.

(c) If it is used in MODS facilities, indicate whether a facility would contain a maximum of one unit, or possibly multiple units.

(d) If multiple units of the same model are present, describe in operational terms how these units are used.

UPS/USPS-T10-12. Refer to pages 10 through 12 of your testimony, where you describe the following mail processing equipment: (i) Multi-Position Flats Sorting

**INTERROGATORIES OF UNITED PARCEL SERVICE  
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Machine (FSM 881); (ii) Multi-Position Flats Sorting Machine (FSM 1000); and (iii) Automated Flats Sorting Machine 100 (AFSM 100).

(a) Indicate whether each piece of equipment is used in MODS facilities or only in other types of facilities.

(b) If it is used in MODS facilities, indicate whether it is used in all MODS facilities, most MODS facilities, or only a few MODS facilities.

(c) If it is used in MODS facilities, indicate whether a facility would contain a maximum of one unit, or possibly multiple units.

(d) If multiple units of the same model are present, describe in operational terms how these units are used.

UPS/USPS-T10-13. Refer to pages 18 and 19 of your testimony, where you describe Primary and Secondary Parcel Sorters.

(a) Indicate whether this equipment is used in MODS facilities or only in other types of facilities.

(b) If it is used in MODS facilities, indicate whether it is used in all MODS facilities, most MODS facilities, or only a few MODS facilities.

(c) If it is used in MODS facilities, indicate whether a facility would contain a maximum of one unit, or possibly multiple units.

(d) If multiple units of the same model are present, describe in operational terms how these units are used.

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UPS/USPS-T10-14. Refer to page 20 of your testimony, where you described the following bundle processing equipment: (i) Small Parcel and Bundle Sorter (SPBS); (ii) Small Parcel and Bundle Sorter Feed System; and (iii) Linear Integrated Parcel Sorters (LIPS).

(a) Indicate whether each piece of equipment is used in MODS facilities or only in other types of facilities.

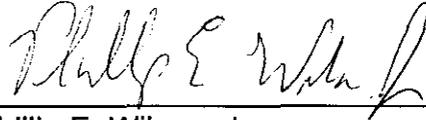
(b) If it is used in MODS facilities, indicate whether it is used in all MODS facilities, most MODS facilities or only a few MODS facilities.

(c) If it is used in MODS facilities, indicate whether a facility would contain a maximum of one unit, or possibly multiple units.

(d) If multiple units of the same model are present, describe in operational terms how these units are used.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



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Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: March 6, 2000  
Philadelphia, Pa.