

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
WITNESS KINGSLEY TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T10-10-14)

The United States Postal Service hereby provides the responses of witness
Kingsley to the following interrogatories of United Parcel Service:

UPS/USPS-T10-10-14, filed on March 6, 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.
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March 20, 2000

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

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.

Response:

Primary refers to the first distribution process for that level of sort, outgoing (outgoing to the rest of the world) or incoming (incoming for destination within the facilities service area). Secondary refers to the second distribution process for a given level of sort, again, outgoing or incoming. For example, mail which destines at a facility may be sorted to 3-digits, SCF, or AADC (sectional center facility and automated area distribution center – see DMM section L for details). The facility will perform an incoming primary sort to sort these volumes to 5-digits. Incoming secondary would then sort the 5-digit (or 5-digit scheme if zones are combined) to the carrier route, firm, or P.O. Box level.

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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 (MLOC); (iv) Low Cost MLOC; (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.

Response:

(a) (i.) AFCS – Vast majority are in MODS facilities (P&DCs and P&DFs).

(ii) LSM – The five LSMs left are primarily in non-MODS facilities.

(iii) MLOC – Located in MODS facilities (P&DCs and P&DFs).

(iv) Low cost OCRs – Located in MODS facilities, and small “customer service” plants and post offices, which are non-MODS offices (see DFC/USPS-T10-4 for LCOCR locations).

(v) RBCS – The vast majority are in MODS offices (P&DCs and P&DFs).
There are a few non-MODS facilities supported by RBCS.

(vi) DBCS – The majority are in MODS offices, however, DBCSs are also located in small “customer service” plants and post offices which are non-MODS facilities.

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- (vii) CSBCS - The vast majority are in non-MODS offices.
 - (viii) MPBCS - The vast majority are in MODS facilities.
 - (ix) LMLM - The vast majority are in MODS facilities.
 - (x) ID Code sort will be on all BCSs, so MODS and non-MODS facilities based on previous responses above by BCS type.
 - (xi) Tabbng equipment - The vast majority, if not all, would be in MODS facilities.
- (b)
- (i.) AFCS - In all MODS facilities.
 - (ii) LSM - In very few MODS facilities.
 - (iii) MLOCR - Located in all MODS facilities.
 - (iv) Low cost OCRs - Located in a few MODS facilities.
 - (v) RBCS - Located in all MODS facilities.
 - (vi) DBCS - Located in all MODS facilities.
 - (vii) CSBCS - Located in very few MODS facilities.
 - (viii) MPBCS - Located in all MODS facilities.
 - (ix) LMLM - Located in all MODS facilities.
 - (x) ID Code sort - Located in all MODS facilities.
 - (xi) Tabbng equipment - Located in a few MODS facilities.
- (c)
- (i.) AFCS - multiple units.
 - (ii) LSM - one unit, if any.
 - (iii) MLOCR - vast majority have multiple units.
 - (iv) Low cost OCRs - usually one unit, maybe two.
 - (v) RBCS - One system per site.

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- (vi) DBCS – multiple units.
- (vii) CSBCS – multiple units, at least two.
- (viii) MPBCS – vast majority have multiple units.
- (ix) LMLM – vast majority have one unit, a few sites may have two units.
- (x) ID Code sort - multiple units.
- (xi) Tabbing equipment – one unit; a few sites have two or three.
- (d) (i.) AFCS – multiple units required to face and cancel all of the collection mail within the operating window. Feed systems feed all machines to level workload based on availability.
- (iii) MLOCR – multiple units required to barcode letters within the operating window. During outgoing processing, all OCRs are in the same sort plan and volume is distributed to the OCRs to level workload based on availability to complete as early as possible.
- (vi) DBCS – Each DBCS is usually assigned specific zones (ZIP Codes) for DPS and as a back up for another zone if its DBCS is down for some reason. Some DBCSs are programmed to sort FIM and barcoded outgoing primary volumes and others sort AADC/SCF/Incoming primary programs to 5-digits. Decisions for equipment assignments are based on arrival profiles, number of stackers, location on the workroom floor, maintenance windows, etc.
- (vii) CSBCS – Multiple machines required to sort carrier route presorted volume to DPS to the site's zones. Again, machines are usually programmed to run the same routes on a daily basis and as a back-up for another CSBCS.

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(viii) MPBCS – Similar to OCR. Required as a BCS/OSS to barcode RBCS results primarily for outgoing primary to meet operating window requirements.

(x) ID Code sort - On every BCS, not related to sort plan/mailflow decisions.

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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 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.

Response:

(a)(i) FSM 881 – The vast majority are in MODS facilities.

(ii) FSM 1000 – The vast majority are in MODS facilities.

(iii) AFSM 100 – Phase I will be located in MODS facilities. Phase II locations have yet to be determined but are expected to be located primarily in MODS offices. See response to DMA/USPS-T10-17 for phase I locations.

(b)(i) FSM 881 – In all MODS facilities.

(ii) FSM 1000 – In the majority of MODS facilities.

(iii) AFSM 100 – Phase I to be located in most MODS facilities. Phase II will reach all MODS facilities.

(c)(i) FSM 881 – Usually multiple units.

(ii) FSM 1000 – Usually one or two units.

(iii) AFSM 100 – Possibly multiple units.

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(d)(i) – (iii) All FSMs – Very similar to the DBCS explanation in UPS/USPS-T10-

11(d) above. Used for outgoing, incoming primary and incoming secondary.

**Machine assignments based on volume, machinability of the mail, operating
windows, and zone assignments.**

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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.

Response:

(a) Parcel Sorters are located in BMCs, which are non-MODS facilities.

(b) – (d) NA

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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.

Response:

(a) (i) – (iii) SPBS, the SPBS feed system, and – The vast majority are located in MODS facilities and some are in BMCs, which are non-MODS.

(b) (i) – (ii) SPBS and the SPBS feed system – used in almost all MODS facilities.

(iii) LIPs – Used in a few MODS facilities.

(c) (i) – (iii) SPBS, the SPBS feed system, and LIPs – Usually one or two units per facility.

(d) (i) – (iii) SPBS, the SPBS feed system, and LIPs – If more than one SPBS is present, depending on the facility, operating windows, volume, and service commitments, etc., one SPBS may be set up to sort one shape or class while the other sorts another shape or class.

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: 3-20-2000

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 black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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