

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 INTERROGATORY OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS VAN TY SMITH
(TW/USPS-T17-16(b))

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Time Warner, Inc.: TW/USPS-T17-16(b), filed on March 6, 2000, and redirected from witness Van Ty Smith.


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



Susan M. Duchek

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March 20, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF TIME WARNER INC REDIRECTED FROM WITNESS VAN-
TY-SMITH**

TW/USPS-T17-16

- (b) Please identify all uses the Postal Service itself makes of pallets in today's environment, to transport mail as well as other items (e.g., sacks and trays). Indicate whether each type of usage is part of normal operating procedures or whether it occurs only in unusual circumstances. Please also indicate the types of facilities in which each type of usage occurs, any estimates of how frequently it occurs, and provide copies of any relevant operating instructions.

RESPONSE:

The USPS provides large quantities of pallets to mailers for palletized mailings and uses pallets to transport mail and mail transport equipment. In Bulk Mail Centers, pallets are used to make up mail to be transported to other facilities such as Bulk Mail Centers, Processing and Distribution Centers, and Delivery Units. Empty sacks and trays are also sometimes transported on pallets. Pallets are used at the Mail Transport Equipment Service Centers to stack processed mail transport equipment which is then transported to postal facilities and mailer's plants. I am told there are no studies of frequency by type of use.

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: 3-17-2000

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.



Susan M. Duchek

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