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

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POSTAL RATE COMPLISION 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 ASSOCIATION FOR POSTAL COMMERCE (POSTCOM/USPS-T10-10)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Association for Postal Commerce: POSTCOM/USPS-T10-10, filed on March 22, 2000.

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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 April 4, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE

POSTCOM/USPS-T10-10 In your response to AAP/USPS-T-10-2 you say:

"Bound Printed Matter bundles on BMC pallets will likely contain 3-digit and higher presort bundles that are incompatible with the Parcel Sorters."

Please explain why "3-digit and higher presort bundles . . . are incompatible with . . . Parcel Sorters."

Response:

There are three basic reasons: 1) Popular industry packaging and/or bundling methods of BPM do not meet machinability requirements, (2) BPM bundles often exceed the maximum allowable weight for the parcel sorting machines which is 25 pounds for books or other printed matter, and (3) BMC parcel sorting machines (PSM) primarily finalize parcel sortation to 5-digit ZIP Code destinations. The PSMs do not assign run-outs for 3-digit or ADC working bundles. In addition, employees key mail on the PSM based on the full 5-digit ZIP Code. If a parcel is not prebarcoded, then a 5-digit barcode will be applied to the piece on the primary parcel sorter. This 5-digit barcode application is not appropriate for working bundles and would result in mail going to a delivery unit that must come back to the plant for piece distribution, in addition to delaying the mail. Finally, working bundles would require keying based on the ZIP Code of the top piece in addition to the presort level of the entire bundle as indicated by the optional endorsement line or sticker.

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.

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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