

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
UNITED PARCEL SERVICE
(UPS/USPS-T10-33)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of United Parcel Service: UPS/USPS-T10-33, 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

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April 4, 2000

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

UPS/USPS-T10-33 Provide a copy of all versions of PS Form 8125 that were in use or used during any portion of FY1998.

Response:

See attached. The new forms as of July 1998 as well as the old PS Form 8125 would have been presented with mail during a portion of FY 1998. Customer facsimiles of these forms are also accepted.

United States Postal Service
Plant-Verified Drop Shipment (PVDS)
Verification and Clearance

Requested In-home Delivery Date *(Three-day window)*

Drop Ship Appointment Number

See Instructions on Reverse

Mailer Information	1. Mailer's Name		7a. Mailer's Contact Name	7b. Mailer's Contact Telephone
	2. Origin Plant Location <i>(City, State, ZIP+4)</i>		8. Check One <input type="checkbox"/> Identical-Weight Pieces. Weight of a Single Piece _____ <input type="checkbox"/> Nonidentical-Weight Pieces	
	3. Class of Mail <input type="checkbox"/> Periodicals <input type="checkbox"/> Standard (A) <input type="checkbox"/> Standard (B) <input type="checkbox"/> International <i>(Specify class)</i>	4. Product or Publication Titles or Names	9. Total Gross Weight of Shipment	
	5. Number of Containers by Type Pallets and Pallet Boxes: _____ with pkgs. or bundles _____ with trays _____ with sacks _____ with parcels Non-Palletized Containers: _____ bundles _____ trays _____ sacks _____ parcels _____ other (describe): _____		10. Type of Mail Processing Category <i>(Check all that apply)</i> <input type="checkbox"/> Letters <input type="checkbox"/> Automation Compatible <input type="checkbox"/> Irregular Parcels <input type="checkbox"/> Flats <input type="checkbox"/> Machinable Parcels <input type="checkbox"/> Nonmachinable Parcels	
	6. Comments		11. Entry Discounts Claimed <i>(Check all that apply)</i> <input type="checkbox"/> DDU <input type="checkbox"/> DSCF <input type="checkbox"/> DBMC <input type="checkbox"/> OBMC <input type="checkbox"/> Zone Rates <input type="checkbox"/> Local Zone Rates <input type="checkbox"/> Mailing includes pieces for delivery outside service area or entry office <input type="checkbox"/> (International) Service Center (ISC) <input type="checkbox"/> Other (International)	
			12a. Contact at Company Making Drop Ship Appointment <i>(If other than mailer and if known when completing this form)</i>	

Origin Post Office (Where verified)	13. Origin Post Office <i>(City, State, and ZIP+4)</i>		22a. Name of USPS Employee Verifying Mail	22b. Employee's Telephone
	14. Verified at <input type="checkbox"/> DMU <i>(Mailer's plant)</i> <input type="checkbox"/> BMEU or Post Office		22c. Signature of Verifying Employee	23. Date <i>(Round)</i> Stamp
	15. Permit Number	16. Postage Payment Method <i>(Except for Periodicals)</i> <input type="checkbox"/> Permit <input type="checkbox"/> Stamped <input type="checkbox"/> Meter	22d. Contact's Name <i>(If other than verifying employee)</i>	
	17. Total Pieces	18. Total Weight of Mailing	22e. Contact's Telephone	
	19. Vehicle PVDS Seal Number	20. Vehicle ID Number		
	21. Comments			

Destination Entry Post Office or Delivery Unit	24. Entry Office <i>(City, state, ZIP+4. If mail will be entered at a BMC facility, write "BMC" as well)</i>		30. Load Condition Irregularities <i>(Check all that apply)</i> <input type="checkbox"/> Pallets Too Tall (T) <input type="checkbox"/> Load Unsafe (U) <input type="checkbox"/> Broken Pallets (B) <input type="checkbox"/> Overweight Pallets (O) <input type="checkbox"/> Packages on BMC Pallets Not Machinable (M) <input type="checkbox"/> Separations Do Not Match 8125s (P) <input type="checkbox"/> Courtesy Pallets (I) <input type="checkbox"/> Container Counts Do Not Match 8125s (P) <input type="checkbox"/> Other <i>(Describe in "Comments" section 32)</i>	
			31. Appointment <input type="checkbox"/> Arrived Early (E) <input type="checkbox"/> Arrived Late (L) <input type="checkbox"/> No Appointment (N)	
			32. Comments	
	25a. USPS Receiving Employee's Signature	25b. USPS Receiving Employee's Name		
	26. Date of Arrival	27. Time of Arrival		
	28. Date of Departure	29. Time of Departure		

Definitions and Features

Form 8125 proves to the entry facility that the mail being presented by the mailer or mailer's agent was verified and paid for at origin.
Plant-verified drop shipment (PVDS) enables origin verification and postage payment for shipments that a mailer transports from the mailer's plant to destination post offices, where the prepaid and pre-verified shipments are accepted by the Postal Service as mail.
Postal Service employees verify PVDS mailings for classification, rate eligibility, preparation, and presort either at the mailer's plant or at the origin post office serving the mailer's plant.
Standards for PVDS shipments are in *Domestic Mail Manual* (DMM) P750. Information about destination entry discounts for each class of mail are in DMM Module E, *Eligibility*. DMM E651 contains volume limits for PVDS Standard Mail that is for delivery outside the entry office service area. There are no limits for Periodicals.
Appointments to deposit PVDS mailings at entry offices are required for Standard Mail. Appointments are required for Periodicals only if they will be presented on vehicles that also contain PVDS Standard Mail.

Instructions for Mailer

With each PVDS mailing presented for verification and postage payment to the origin post office (or detached mail unit), the mailer must submit a PS Form 8125 (or approved facsimile) completed as described below. The original Form 8125, after being signed and round dated by the origin verifying post office, must be submitted to the entry post office with the PVDS mailing it represents. But for PVDS mailings sent via Express Mail or Priority Mail drop shipment, Form 8125 is not required.

Completing Form 8125

"Requested In-Home Delivery Date": If completed, the mailing should be deposited by the mailer or mailer's agent at the entry office in time to meet the delivery window. Delivery within this window is not guaranteed.

"Drop Shipment Appointment Number": The appointment number may be added by the mailer or mailer's agent after the 8125 is signed and dated by the origin post office but before the PVDS mailing is presented to the destination post office.

The "Mailer Information" section (1 through 12) identifies the mail preparer and provides a description of the mail to be deposited at the destination entry post office listed in item 24. The mailer must complete all items in the "Mailer Information" section except for optional items 6 and 12.

- In item 5, report the mail as configured for verification and as it will be presented to the entry office (for example, if trays are presorted on pallets, show the number of pallets with trays). If a mailing consists of a combination of palletized and non-palletized mail, report each segment correctly in this item.
- In item 6, you may show other mailer information (for example, sequence number for a postage statement, manifest, or 8125).
- In item 7 (and 12 if possible), report the name and telephone number of a mailer contact familiar with the subject mailing who can resolve problems that may arise at the entry office.
- In item 11, show all entry discounts claimed for pieces in the mailing. A single mailing may contain pieces subject to different entry discounts (no more than one entry discount may be claimed for any individual piece).

In the "Destination" section, fill out only the first item (24), "Entry Office." Show the city, state, and ZIP+4 of the post office or postal facility where the PVDS mailing will be deposited. For mail entered at an SCF or a BMC, show the city and state names as they appear in the applicable labeling list from DMM Module L to facilitate verification of any entry discounts claimed. The physical address of the facility may also be shown. All entry discounts must be based on entry at this facility. If the mailing will be deposited at a bulk mail center (BMC), show the designation "BMC" with the city and state as they appear in the applicable labeling list from DMM Module L (the physical address may also be shown with the ZIP+4).

Submitting Mailing and Form 8125 to Entry Post Office

The mailer or mailer's agent must submit copy 1 of this Form 8125 (with the original signature and round date of the origin post office) with the PVDS mailing presented for acceptance to the entry postal facility shown in the first item of the "Destination" section. Submit a second copy if you want one signed by the entry office and returned for your records.

The mailing presented to the entry office must be configured as reported under "Type and Number of Containers" and must match the other information on Form 8125 as validated by the origin post office (verifying office).

- Mail must not be reconfigured in containers after verification at origin. This ensures that the entry office is able to reconcile the information on the 8125 with the mail being presented for acceptance. For example, mail verified and reported as non-palletized sacks or trays (rather than as sacks or trays prepared on pallets) must be presented to the entry post office in the same configuration.
- Consolidators must not take mail received from mailers as non-palletized sacked or trayed mailings (reported on Forms 8125 as non-palletized mailings) and place the mail on pallets or in other containers after verification (for reasons like facilitating transportation) because the entry office will be unable to reconcile the mail with 8125s representing the mail. For example, if an agent places on pallets 10 sacks from one mailing and 15 sacks from another mailing reported on Forms 8125 as non-palletized sacks, there would be no 8125 representing one pallet of 25 sacks and the destination entry office may refuse or delay acceptance of the mail.

Instructions for Post Office of Origin (Office Where PVDS Mailing Is Verified)

Be sure mailer has completed all required items in the "Mailer Information" section and item 24.

Complete the "Origin Post Office" section after verifying that all information is correct. Optional items are "Vehicle PVDS Seal number," "Vehicle ID Number," and "Comments."

Sign and round date this form. Return copies 1 and 2 to the mailer. Retain copy 3 in your files for one year.

Instructions for Destination Entry Post Office or Delivery Unit

Either remove the 8125s for your office from the vehicle or receive them from the mailer or mailer's agent and check that your office is shown as the entry facility under "Entry Office" (item 24).

Check that the form is completed, signed, and round dated by the origin post office.

Check the integrity of the mail load to be sure that it is safe to unload. Note any load condition irregularities under "Load Condition Irregularities" (item 30).

Compare the shipment with the form(s) for class, volume (such as number of containers), processing category, entry rates claimed, and so on.

If the 8125 is properly completed and the information on it matches the mail, accept the shipment. Complete the "Destination" section (items 25 through 32) legibly. Retain the completed 8125 in your files for one year. If the mailer or mailer's agent has presented two copies, complete the "Destination" section on the second copy and return it to the mailer or mailer's agent who presented it to you.

If the mail is visibly damaged, the shipment does not match the information on the 8125, or the entry facility on the 8125 is not your facility, do not accept the mail until the discrepancy is resolved.

- You may need to notify your supervisor of the problem(s).
- Either you or your supervisor may need to contact the origin post office (entered as "USPS Employee Verifying Mail") to resolve the discrepancy.

United States Postal Service
Plant-Verified Drop Shipment (PVDS)
Consolidated Verification and Clearance

Requested In-home Delivery Date (Three-day window)
Drop Ship Appointment Number

MAILER: This form is for the use of an individual mailer only, for multiple PVDS mailings cleared at origin on the same day for entry at a single destination on the same vehicle.

1. Mailer's Name		3a. Mailer's Contact Name	3b. Mailer's Contact Telephone
2. Origin Plant Location (City, State, ZIP+4)		4. Contact and Telephone at Company Making Drop Ship Appointment (If other than mailer and if known when completing this form)	
6. Individual Mailings KEY (Used below to describe individual mailings) Payment Type: P Permit M Metered S Precanceled Stamped Number of Pallets & Type: PK Pallets with packages PS Pallets with sacks PT Pallets with trays PP Pallets with parcels Number of Non-Palletized Containers & Type: S Sacks T Trays P Parcels B Bedloaded bundles O Other Type (Mail category): L Letters F Flats A Automation compatible I Irregular parcels M Machinable parcels N Nonmachinable parcels		5. Destination Entry Discounts Claimed (Check all that apply) <input type="checkbox"/> DDU <input type="checkbox"/> DSCF <input type="checkbox"/> DBMC <input type="checkbox"/> OBMC <input type="checkbox"/> Zone Rates <input type="checkbox"/> Local Zone Rates <input type="checkbox"/> Mailing includes pieces for delivery outside service area or entry office	

Permit Holder	Product Name/ID	Postage Stmt. Sequence No.	Permit No. & Payment Type (Except PER)	Number of Pallets & Type	Number of Non-Palletized Containers & Type	Number of Pieces	Piece Weight	Total Gross Weight	Class	Type
Totals										

7. Comments

8. Origin Post Office (City, State, and ZIP+4)		15a. Name of USPS Employee Verifying Mail (Printed)		16. Date (Round) Stamp			
9. Verified at <input type="checkbox"/> DMU (Mailer's plant) <input type="checkbox"/> BMEU or Post Office		15b. Employee's Telephone					
10. Total Pieces		11. Total Weight of Mailing				15c. Signature of Verifying Employee	
12. Vehicle PVDS Seal Number		13. Vehicle ID Number				15d. Contact Name (If other than verifying employee)	
14. Comments						15e. Contact's Telephone	

17. Entry Office (City, state, ZIP+4. If mail will be entered at a BMC facility, write "BMC" as well)		23. Load Condition Irregularities (Check all that apply) <input type="checkbox"/> Pallets Too Tall (T) <input type="checkbox"/> Load Unsafe (U) <input type="checkbox"/> Broken Pallets (B) <input type="checkbox"/> Overweight Pallets (O) <input type="checkbox"/> Packages on BMC Pallets Not Machinable (M) <input type="checkbox"/> Separations Do Not Match 8125s (P) <input type="checkbox"/> Courtesy Pallets (I) <input type="checkbox"/> Container Counts Do Not Match 8125s (P) <input type="checkbox"/> Other (Describe in "Comments" section 25)			
18a. USPS Receiving Employee's Signature		18b. USPS Receiving Employee's Name		24. Appointment <input type="checkbox"/> Arrived Early (E) <input type="checkbox"/> Arrived Late (L) <input type="checkbox"/> No Appointment (N)	
19. Date of Arrival		20. Time of Arrival		25. Comments	
21. Date of Departure		22. Time of Departure			

United States Postal Service
Plant-Verified Drop Shipment (PVDS)
Consolidated Verification and Clearance — DSMS

ATTACHMENT UPS/USPS-710-33

Requested In-home Delivery Date (Three-day window) **110-E 405**

Drop Ship Appointment Number

CONSOLIDATOR: This form is for the use of an authorized drop shipment management system (DSMS) consolidator only, for multiple PVDS mailings cleared at origin on the same day for entry at a single destination on the same vehicle.

1. Consolidator's Name		3a. Consolidator's Contact Name	3b. Consolidator's Contact Telephone
2. Origin Plant Location (City, State, ZIP+4)		4. Contact and Telephone at Company Making Drop Ship Appointment (If other than consolidator and if known when completing this form)	
6. Individual Mailings KEY (Used below to describe individual mailings) Payment Type: P Permit M Metered S Precanceled Stamped Number of Pallets & Type: PK Pallets with packages PS Pallets with sacks PT Pallets with trays PP Pallets with parcels Number of Non-Palletized Containers & Type: S Sacks T Trays P Parcels B Bedloaded bundles O Other Type (Mail category): L Letters F Flats A Automation compatible I Irregular parcels M Machinable parcels N Nonmachinable parcels		5. Destination Entry Discounts Claimed (Check all that apply) <input type="checkbox"/> DDU <input type="checkbox"/> DSCF <input type="checkbox"/> DBMC <input type="checkbox"/> OBMC <input type="checkbox"/> Zone Rates <input type="checkbox"/> Local Zone Rates <input type="checkbox"/> Mailing includes pieces for delivery outside service area or entry office	

Product/Job Name	Product/Job ID Number	Permit No. and Payment Type (Except PER)	Pallet/Pallet Group ID	Number of Pallets and Type	Mailer ID	Total Gross Weight	Class	Type	DMU Release Date
Totals									

7. Comments	8. Date This Form 8125-CD Created
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This Form 8125-CD was verified and accepted under the Drop Shipment Management System (DMS). No postal signature or round stamp date is required. Contact the consolidator listed above if there are questions, or refer to the most recent *Postal Bulletin* article on DSMS for postal contacts.

Destination Entry Post Office or Delivery Unit

9. Entry Office (City, state, ZIP+4. If mail will be entered at a BMC facility, write "BMC" as well)		15. Load Condition Irregularities (Check all that apply) <input type="checkbox"/> Pallets Too Tall (T) <input type="checkbox"/> Load Unsafe (U) <input type="checkbox"/> Broken Pallets (B) <input type="checkbox"/> Overweight Pallets (O) <input type="checkbox"/> Packages on BMC Pallets Not Machinable (M) <input type="checkbox"/> Separations Do Not Match 8125s (P) <input type="checkbox"/> Courtesy Pallets (I) <input type="checkbox"/> Container Counts Do Not Match 8125s (P) <input type="checkbox"/> Other (Describe in "Comments" section 25)	
10a. USPS Receiving Employee's Signature	10b. USPS Receiving Employee's Name	16. Appointment <input type="checkbox"/> Arrived Early (E) <input type="checkbox"/> Arrived Late (L) <input type="checkbox"/> No Appointment (N)	
11. Date of Arrival	12. Time of Arrival	17. Comments	
13. Date of Departure	14. Time of Departure		

United States Postal Service
**Plant-Verified Drop Shipment (PVDS)
Verification/Clearance**

Requested In-home Delivery Date (Three-day window)
Plant-Verified Drop Shipment (PVDS) Verified and Paid for at: <input type="checkbox"/> Origin Mailing Plant (DMU Verification) <input type="checkbox"/> Origin Post Office (BMEU Verification)

Part I - Mailer

- A. Complete Part I, items 1-8 and Part III, item 1. Part I, items 9-11 are optional (If an appointment is required, item 9 may be required at time of entry.)
- B. Submit this completed form with the related shipment(s) and postage statements(s) to the Detached Mail Unit (DMU) or Business Mail Entry Unit (BMEU) when the shipment is submitted for verification and clearance for dispatch.
- C. After the verifying employee has completed, signed, and dated this form, attach copies 2 and 3 to the left inside rear wall of the vehicle, just inside the rear doors. If the vehicle is to stop at multiple destination facilities to deposit mail, place the clearance documents for each stop in separate envelopes bearing the name of each entry office.

1. Mailer's Name		7. Total Gross Weight of Shipment	
2. Origin Plant Location (City, State, ZIP + 4)		8. Type and Number of Containers <input type="checkbox"/> Pallets (with: <input type="checkbox"/> pkgs. <input type="checkbox"/> sacks <input type="checkbox"/> trays) _____ <input type="checkbox"/> Trays (bedloaded) _____ <input type="checkbox"/> Sacks (bedloaded) _____ <input type="checkbox"/> Other (Describe): _____	
3. Class of Mail <input type="checkbox"/> Periodicals <input type="checkbox"/> Standard (A) <input type="checkbox"/> Standard (B)	4. Product Name		
5. Type of Mail/Payment Method (Check all that apply) <input type="checkbox"/> Letters <input type="checkbox"/> Machinable <input type="checkbox"/> Flats <input type="checkbox"/> Automation <input type="checkbox"/> Irregular <input type="checkbox"/> Compatible <input type="checkbox"/> Permit <input type="checkbox"/> Metered <input type="checkbox"/> Stamped		6. Destination Entry Discounts Claimed (Check all that apply) <input type="checkbox"/> DDU <input type="checkbox"/> DBMC <input type="checkbox"/> DSCF <input type="checkbox"/> Zone Rates <input type="checkbox"/> Shipment includes pieces for delivery outside of entry office service area	
		9. Drop Shipment Appointment No. (May be added after verification)	10. USPS Authorized Mailing ID Code (Optional)
		11. Additional documentation attached describing mail to be off-loaded at entry office (e.g., bill of lading, sack/tray/pallet listing, vehicle load diagram, etc.) <input type="checkbox"/> Yes <input type="checkbox"/> No	

Part II - Post Office of Origin (Where Shipment is Verified)

- A. Be sure the mailer has completed Part I, items 1-8 and Part III, item 1. (Part I items 10 and 11 are optional. Item 9 may be completed after dispatch at time of entry.)
- B. Complete Part II, items 1-10. Show seal number that will be used to seal mailer's vehicle (at mailer's request) and vehicle ID number in item 8.
- C. Retain copy 2 for your records.
- D. Give copies 1 and 3 of this completed form to the mailer for placement in the vehicle in which shipments are dispatched.
- E. After vehicle is loaded, seal vehicle with PVDS seal at mailer's request.

1. Origin Post Office (City, State, and ZIP + 4)		9. USPS Employee Verifying Mail		10. Date
2. Permit Number	3. Permit <input type="checkbox"/> Imprint <input type="checkbox"/> Stamped <input type="checkbox"/> Meter		a. Printed Name	
4. Single Piece Weight	5. Total Pieces	6. Total Weight	b. Signature	
7. Vehicle Seal Number (except 2nd class)	8. Vehicle ID No.		c. Telephone Number	
(Round Stamp)				

Part III - Destination Entry Post Office or Delivery Unit

- A. Reconcile information on this form against total volume in the shipment(s) deposited (e.g., count containers, weigh shipment, etc.)
- B. Verify that the seal number in Part II, item 3 matched that on the seal removed from the vehicle, if the vehicle was sealed.
- C. If the seal number and shipment volume match the shipment deposited, complete Part III, items 2-6, and accept the mail. Give copy 3 to driver, if requested.
- D. Retain copy 1 in your files for 1 year (along with the seal removed from the vehicle, if applicable.)
- E. If the shipment volume and/or seal number do not match: (1) hold the shipment and vehicle, and (2) call the office of origin or the district office that made the appointment immediately to resolve the discrepancy. Describe any irregularities in item 7.

1. Entry Office (City, State, ZIP + 4)		7. Comments	
2. USPS Receiving Employee's Signature			
3. Date of Arrival	4. Time of Arrival		
5. Date of Departure	6. Time of Departure		

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: 4-4-2000

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 solid horizontal line.

Susan M. Duchek

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April 4, 2000