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

POSTAL RATE AND FEE CHANGES, 2000 | Docket No. R2000–1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER, INC. (TW/USPS–T10–5-11)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Time Warner, Inc.: TW/USPS–T10-5-11, filed on March 22, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER INC.

TW/USPS-T10-5 *In your answer to DMA/USPS-10-55 you state, in reference* to the economics of SPBS feed systems:

"For every hour spent manually dumping sacks into the SPBS, it was estimated that the feed system would generate approximately 143 hours of annual savings. For every hour spent dumping non-sacks into the SPBS, it was estimated that the feed system would generate approximately 572 hours of annual savings."
Please explain what this means. In particular:

a. Does the one hour of sack dumping required to produce 143 hours of annual savings refer to one manhour per day? If yes, how many workdays does that assume? If no, precisely what does the one hour used to produce 143 hours of savings mean?

b. Are these savings estimates relative to SPBS sorting of sacked and other *bundles with manual induction? If not, what are the savings relative to?*

c. Confirm that sacked bundles must be dumped manually from the sacks in order to be sorted on an SPBS whether or not the SPBS has a "feed system." If not confirmed, what other method(s) is (are) used to induct sacked bundles to SPBS machines?

d. Given that sacked bundles are dumped from the sacks manually whether or not an SPBS has a "feed system," how can the feed system produce any savings for sacked mail? Please describe all features of the "feed systems" that make the manual dumping of sacks more efficient so as to produce 143 annual hours of savings for every hour spent manually dumping sacks.

e. Do the 572 annual hours savings refer to mail on pallets as well as in hampers, postal paks and other containers? If not, what do they refer to?

f. Are the 572 hours of annual savings estimated relative to a completely manual induction of palletized and containerized bundles to the SPBS *keying stations? If not, what are the annual savings relative to?*

Response:

a. Yes. It assumes 286 processing days for the year and a four-station machine.

b. The estimated savings are relative to SPBS sorting using the prior induction belts which had limited surge capacity and used locally installed container/pallet dumpers on some of the machines.

c. Confirmed.

d. The savings projections were based solely on the anticipated reductions in loader staffing. Savings for sacks were anticipated as a result of the efficiencies offered by only having one induction point. Additional savings, predicted but not quantified, were as a result of the feed systems having greater surge capacity creating a more consistent flow of mail to the keying operators. In addition, the systems contain a built-in culling station creating a more efficient culling operation.

e. Confirmed.

f. See response to part b.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER INC.

TW/USPS-T10-6 Please refer again to your answer to DMA/USPS-10-55 and explain how the savings estimates for "feed systems" with sacked and other bundles were determined. In particular:

a. Do the estimates you give represent averages of estimates obtained from different sites? Or do they reflect a single set of calculations? Please explain.

b. Please provide and explain all productivity rates, conversion factors, mail flow data and other assumptions used in deriving the estimates that one hour of respectively sacked and non-sacked dumping would produce 123 and 572 hours of annual savings.

c. Was the possibility of increased bundle breakage caused by "feed systems" included in the analysis that led to these savings estimates? If yes, how was it included?

d. What instructions were given to the different SPBS sites in order for them to calculate whether or not they had economic justification for installation of a "feed system?" If written instructions were issued, please provide a copy.

e. Please provide one or more typical examples of calculations leading to the conclusion that a given facility could economically justify installation of an SPBS feed system. The identities of the specific facilities may be redacted.

f. Please provide one or more typical examples of calculations leading to the conclusion that a given facility could not economically justify installation of an SPBS feed system. The identities of the specific facilities may be redacted.

Response:

a. The feed system was designed to require fewer loaders compared to the previous operation where four to six individual induction stations had to be supplied with mail. This allowed the staffing matrix to be adjusted for the SPBS, and the savings were calculated based on the new staffing numbers. The savings were demonstrated during limited operational field testing and

were validated prior to the second buy of feed systems using the realized savings from the first buy.

b. I assume you mean 143 hours of annual savings for sacked mail as stated in DMA/USPS-T1-55. The savings were calculated based on the adjusted staffing matrix for the SPBS and the machine run time used to process sacked and non-sacked mail at a particular site. When processing sacks on a four-station machine, the staffing is reduced by .5 positions. When processing non-sacks on a four-station machine, the staffing is reduced by two positions. On a six-station machine, the corresponding staffing reductions are one position for sacks and three positions for non-sacks.

c. Savings for bundle breakage were predicted but not included in the calculations.

d. The field sites did not calculate whether or not they had economic justification for installation. They were simply asked to provide their run times for the SPBS, and the savings based on the staffing reductions were calculated and used for the economic justification.

e. See attached spreadsheet.

f. Refer to the attached spreadsheet from part e. Sites that could not justify an SPBS would have run times that fall below the "marginal" justification.

APPENDIX F : SPBSFS 37 BUY SITE SPECIFIC SAVINGS

"FIRST" COLUMN SHOWS WHETHER FINAL AREA RESPONSES ARE REFLECTED.
COLUMNS B-G ARE FROM SPBS-46 & SPBS-54 BUY DARS. FIELD UPDATES ARE NOTED IN COL. D & RELATED FOOTNOTES.
COLUMNS H,M & N SHOW FIELD RESPONSES TO EREA [illegible] SAVINGS OFFER, REVISED [illegible]
COLUMNS I & J REFLECT FIELD INPUT TO [illegible] SAVINGS SURVEY
COLUMN O REPORTS WHETHER COLUMN L FIGURES PROVIDE AN ECONOMICAL MACHINE.
COLUMNS P-S SHOW EREA PROCESSING OF FIELD RESPONSES. HIGHEST SAVINGS WILL BACKFILL THE THE 230-SPBS BUY, SEE NOTE 7.
COLUMN T SHOWS SAVINGS FOR UNASSIGNED MACHINES

FINAL	B	C	D	E	F	G	H	I	J	K	L=I+K	M	N	O	P	Q	R	S	T
	[illegible]	SPBS BUY	SPBSFS DEPLOY SITE/MACH#	AREA	# INDUCT STA.	daily total SPBS RUN.HRS	Daily back SPBS RUN.HRS	BACK RUN ANNUAL SAVINGS	Daily NON-BACK SPBS RUN.HRS	NON-BACK RUN ANNUAL SAVINGS	TOTAL ANNUAL SAVINGS	[illegible]	[illegible]	[illegible]	PROJECT BUDGETED SAVINGS	#	[illegible]	[illegible] 37-DAR (7) [illegible]	[illegible] 37-DAR (7) [illegible]
X	5	46			6	20	2	572	16.0	15,444	16,016	YES	YES	YES, 20%+	16016	1	16016		
X	72	54			6	20	5	1,430	15.0	12,870	14,300	YES	NU PED	YES, 20%+	14300	2	14300		
X	8	46			6	20	5	1,430	15.0	12,870	14,300	YES	NU PED	YES, 20%+	14300	3	14300		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	1	46			6	18.0	4.0	1,144	14.0	12,012	13,156	YES	YES	YES, 20%+	13156	5	13156		
X	25	46			6	18.0	4.0	1,144	14.0	12,012	13,156	YES	YES	YES, 20%+	13156	6	13156		
X	4	46			6	20	8	2,288	12.0	10,296	12,584	YES	YES	YES, 20%+	12584	7	12584		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	7	46			6	16.0	5.0	1,430	11.0	9,438	10,868	YES	YES	YES, 20%+	10868	9	10868		
X	51	54			6	14.0	2.1	601	11.9	10,201	10,801	YES	YES	YES, 20%+	10801	10	10801		
X	48	54			6	13.9	2.0	572	11.9	10,211	10,783	YES	YES	YES, 20%+	10783	11	10783		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	286	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	2	46			6	13.0	1.0	286	12.0	10,296	10,582	YES	YES	YES, 20%+	10582	13	10582		
X	80	54			4	20.0	2.0	286	18.0	10,296	10,582	YES	YES	YES, 20%+	10582	14	10582		
X	75	54			6	13.7	4.0	1,144	9.7	8,350	9,494	YES	YES	YES, 20%+	9494	15	9494		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	1,144	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	34	46			6	16.0	6.0	1,716	9.0	7,722	9,438	YES	YES	YES, 20%+	9438	17	9438		
X	60	54			6	12.8	3.0	858	9.8	8,420	9,278	YES	YES	YES, 20%+	9278	18	9278		
X	61	54			6	12.8	3.0	858	9.8	8,420	9,278	YES	YES	YES, 20%+	9278	19	9278		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	29	46			6	13.0	4.0	1,144	9.0	7,722	8,866	YES	YES	YES, 20%+	8866	21	8866		
X	6	46			6	12.91	4.0	1,144	8.9	7,646	8,790	YES	YES	YES, 20%+	8790	22	8790		
X	62	54			4	17	2	286	14.7	8,381	8,667	YES	TBD	YES, 20%+	8667	23	8667		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	82	54			6	12	3	858	9.0	7,705	8,563	YES	YES	YES, 20%+	8563	25	8563		
X	78	54			4	18.4	5.0	715	13.4	7,641	8,356	YES	YES	YES, 20%+	8356	26	8356		
X	66	54			4	16.8	3.0	429	13.8	7,886	8,315	YES	YES	YES, 20%+	8315	27	8315		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	83	54			4	18.0	5.0	715	13.0	7,436	8,151	YES	YES	YES, 20%+	8151	29	8151		
X	3	46			6	12	4	1,144	8.0	6,864	8,008	YES	YES	YES, 20%+	8008	30	8008		
X	10	46			6	10.0	1.0	286	9.0	7,722	8,008	YES	YES	YES, 20%+	8008	31	8008		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	70	54			4	20.0	8.0	1,287	11.0	6,292	7,579	YES	YES	YES, 20%+	7579	33	7579		
X	71	54			6	14	7.9	2,260	6.1	5,252	7,512	YES	YES	YES, 20%+	7512	34	7512		
X	74	54			4	16.8	5.0	715	11.8	6,746	7,461	YES	YES	YES, 20%+	7461	35	7461		
X	[illegible]	[illegible]			[illegible]	[illegible]	[illegible]	1,430	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
X	91	54			4	12.9	0.5	72	12.4	7,086	7,158	YES	YES	YES, 20%+	7158	37	7158		
X	73	54			6	9.0	1.0	286	8.0	6,864	7,150	YES	YES	YES, 20%+	7150	38	7150		
X	14	46			4	13.0	1.0	143	12.0	6,864	7,007	YES	YES	YES, 20%+	7007	39	7007		
X	30	46			[illegible]	13.0	1.0	143	12.0	6,864	7,007	YES	YES	[illegible]	7007	[illegible]	7007	[illegible]	[illegible]
X	99	54			6	10.7	4.0	1,144	6.7	5,762	6,906	YES	YES	YES, 20%+	6906	41	6906		
X	8	46			6	10.0	3.0	858	7.0	6,006	6,864	YES	YES	YES, 20%+	6864	42	6864		
X	90	54			4	12.4	1.0	143	11.4	6,545	6,688	YES	YES	YES, 20%+	6688	43	6688		
X	37	46			4	12.0	0.5	72	11.5	6,578	6,650	YES	YES	YES, 20%+	6650	44	[illegible]	[illegible]	[illegible]
X	11	46			5	11.0	5.0	1,430	6.0	5,148	6,578	YES	YES	YES, 20%+	6578	45		6578	
X	12	46			6	9.0	2.0	572	7.0	6,006	6,578	YES	YES	YES, 20%+	6578	46		6578	
X	89	54			6	12.1	6.7	1,916	5.4	4,654	6,570	YES	YES	YES, 20%+	6570	47		6570	
X	[illegible]	[illegible]			[illegible]	11.4	[illegible]	[illegible]	[illegible]	[illegible]	6,467	YES	[illegible]	[illegible]	6467	[illegible]	[illegible]	6467	[illegible]
X	67	54			6	10.8	5.0	1,430	5.8	4,937	6,367	YES	- YES	YES, 20%+	6367	49		6367	
X	69	54			4	20	12	1,716	8.0	4,576	6,292	YES	TBD	YES, 20%+	6292	50		6292	
X	28	46			6	10.0	4.0	1,144	6.0	5,148	6,292	YES	YES	YES, 20%+	6292	51		6292	
X	[illegible]	46			6	[illegible]	[illegible]	286	7.0	6,006	6,292	YES	YES	[illegible]	6292	[illegible]	[illegible]	6292	[illegible]
X	63	54			6	13.2	9.0	2,574	4.2	3,633	6,207	YES	YES	YES, 20%+	6207	53		6207	
X	81	54			4	13.2	3.3	472	9.9	5,689	6,161	YES	YES	YES, 20%+	6161	54		6161	
X	15	46			4	11.0	0.5	72	10.5	6,006	6,078	YES	YES	YES, 20%+	6078	55		6078	
X	40	46			6	8.0	1.5	429	6.5	5,577	6,006	YES	YES	[illegible]	6006	56	[illegible]	6006	[illegible]
X	42	46			4	12.0	2.0	286	10.0	5,720	6,006	YES	YES	YES, 20%+	6006	57		6006	
X	52	54			6	13.6	10.0	2,860	3.6	3,126	5,986	YES	YES	YES, 20%+	5986	58		5986	
X	86	54			6	7.9	1.5	429	6.4	5,527	5,956	YES	YES	YES, 20%+	5956	59		5956	
X	[illegible]	54			[illegible]	11	[illegible]	143	[illegible]	5,497	5,640	YES	YES	[illegible]	5640	60	[illegible]	5640	[illegible]
X	23	46			4	12.0	3.0	429	9.0	5,148	5,577	YES	YES	YES, 20%+	5577	61		5577	
X	65	54			4	20.0	14.0	2,002	6.0	3,432	5,434	YES	YES	YES, 20%+	5434	62		5434	
X	47	54			6	18.9	18.9	5,405	0.0	0	5,405	YES	YES	YES, 20%+	5405	63		5405	
X	[illegible]	46			[illegible]	12	4	515	8.4	4,805	5,320	YES	YES	[illegible]	5320	64	[illegible]	5320	[illegible]
X	18	46			4	12.0	4.0	572	8.0	4,576	5,148	YES	YES	YES, 20%+	5148	65		5148	
X	32	46			4	9.0	0.5	72	8.5	4,862	4,934	YES	YES	MARGINAL 10-20%	4934	66		4934	
X	64	54			6	17.2	17.2	4,919	0.0	0	4,919	YES	YES	MARGINAL 10-20%	4919	67		4919	
X	84	54			4	11.8	4.8	686	7.0	4,019	4,705	YES	YES	MARGINAL 10-20%	4705	68		4705	
X	27	46			5	8.0	4.0	1,144	4.0	3,432	4,576	YES	YES	MARGINAL 10-20%	4576	69		4576	
X	36	46			4	9.0	2.0	286	7.0	4,004	4,290	YES	YES	MARGINAL 10-20%	4290	70		4290	
X	87	54			4	16.1	12.0	1,716	4.1	2,331	4,047	YES	TBD	MARGINAL 10-20%	4047	71		4047	
X	38	46			4	10.0	4.0	572	6.0	3,432	4,004	YES	YES	MARGINAL 10-20%	4004	72		4004	
	58	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	74			5749
	63	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	75			5749
	77	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	76			5749
	86	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	77			5749
	57	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	78			5749
	62	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	79			5749
	65	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	80			5749
	40	46			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	81			5749
	89	54			6	12.9	9.3	2,660	3.6	3,089	5,749			YES, 20%+	5749	82			5749

	S	T	
TOTAL	157,825	51,737	209,562
COUNT	28	9	
AVG	5637	5749	

NOTES :

2 - RUNTIME CHANGED FROM 6.0 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR
3 - RUNTIME CHANGED FROM 7.0 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR
4 - ALREADY INSTALLED AS OF 6/98
5 - SPBS WAS UPGRADED FROM DAR QUANTITIES
6 - RUNTIME CHANGED FROM 3 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR
7 - 44 MACHINES WILL BACKFILL THE 230-DAR SCHEDULE PER JOEL LUCHUN'S 9-14/98 SCHEDULE
234 230-DAR & ISC-AUTHORIZED MACHINES
-144 ISC/OTHER COMPLETED INSTALLS
-46 ISC/OTHER PENDING INSTALLS
44
8 - RUNTIME CHANGED FROM 9.6 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR
9-10 - BK HRS WERE ADJUSTED FROM ZERO (0) TO FUND SPBSFS1 SAVINGS FOR 3RD SPBS WITH INTERIM SPBSFS
11 - DEFAULT VALUE, TO SITES WITH SPBS SITES REPLACING INTERIM SPBSFS OR MANAGEMENT ACCEPTS SPBSFS
12 - RUNTIME CHANGED FROM SPBS-DAR COMMITTMENT TO CORRESPONDING FACILITY-DAR COMMITMENT
1 - DAR SAVINGS FOR FS for unassigned SPBS from the SPBS-46 & 54 buys will be offered at 12.9 run-hrs/day (302 op dy yr + 38XX hrs yr of stats. From SPBSFS1 DAR) Bk HRS WERE CALC'D FROM AVG SAVINGS ASSIGNED SITES THIS DAR

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TW/USPS-T10-7 Please answer the questions below in two ways: assuming an SPBS with (1) four keying stations, and (2) six keying stations. Please include references to productivity rates, conversion factors, etc. that a facility would consider in analyzing questions of this type.

a. If the SPBS uses manual feed and is being loaded with Periodicals or Standard A bundles from pallets, how many employees would be needed to load the machine fast enough to keep the keyers fully occupied?

b. If the SPBS uses manual feed and is being loaded with Periodicals or Standard A bundles from sacks, how many employees are needed to load the machine fast enough to keep the keyers fully occupied?

c. If the SPBS uses a fully mechanized feed system and is being loaded with Periodicals or Standard A bundles from pallets, how many employees are needed to load the machine fast enough to keep the keyers fully occupied?

d. If the SPBS uses a fully mechanized feed system and is being loaded with Periodicals or Standard A bundles from sacks, how many employees are needed to load the machine fast enough to keep the keyers fully occupied?

e. How many employees are needed on the sweep side of the SPBS, assuming all keying stations are used continuously?

f. What are typically the crafts and pay levels for employees at an SPBS performing respectively (1) dumping and feeding the belts, (2) manning the keying stations, and (3) sweeping?

Response:

a – b. The staffing for an SPBS with manual induction is one loader per induction station for both four- and six-station machines.

c. Based on the anticipated savings in the loading function, the staffing for pallets (non-sacks) is two loaders on a four-station machine and three loaders on a six-station machine.

d. Based on the anticipated savings in the loading function, the staffing for sacks is 3.5 loaders on a four-station machine and five loaders on a six-station machine.

e. The staffing guidelines dictate that an SPBS should be staffed with four sweepers/cullers on a four-station machine and six sweepers/cullers on a six-station machine.

f. PS-4 Mail Handlers are typically responsible for dumping and feeding the belts. PS-5 Distribution Clerks are typically responsible for staffing the keying stations. I am told that both PS-4 Mail Handlers and PS-5 Distribution Clerks can perform the sweeping function depending on the facility and keyer rotation schedules.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER INC.

TW/USPS-T10-8 Please explain what happens when a bundle weighing more than 20 pounds is entered at an SPBS.

Response:

If a bundle weighing more than 20 pounds gets past both the dumper and the keyer, the induction lines on the SPBS contain a weigh unit section. Each weigh unit section contains a computer-controlled weighing mechanism. The weigh unit conveyor receives mail from the coding conveyor. If the mailpiece is too heavy, the weigh conveyor stops and the system generates a clear line reset message to the PC and displays a size throw off command on the operators display. The mail must be removed by the operator who must then reset the induction line via the operator controlled reset pushbutton switch.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER INC.

TW/USPS-T10-9 Please describe all activities that are needed to set up an SPBS for a given sort scheme, using all 100 separations, if the SPBS just prior to that has been used for a different scheme. If possible, please indicate the approximate time normally taken by such scheme changes. Describe and provide copies of any studies that address SPBS setup times.

Response:

Prior to the start of a given sort scheme, the supervisor must ensure that:

- All data and output bins have been cleared from the previous run.
- Sufficient mail volume is available and properly prepared for processing on the SPBS.
- All support equipment, such as sacks, trays, and wiretainers, is in place under the runouts and ready for safe use.
- Placards are in place on the output bins for the new scheme.
- Incline conveyors and mail transport belts have been checked for any mail remaining from previous runs.
- Mail has been loaded onto the inclined conveyor belts or the SPBS Feed System.
- The machine is powered up, if necessary.
- The correct sort plan is loaded.
- The start enable and chain run key switches are turned on.
- Each keyer turns the induction line start enable key switch on each of their operator control boxes to the on position.

Depending on the configuration of the machine (sack vs. container runouts on the sweep-side), these procedures should take between 15 – 30 minutes. I am not aware of any studies that address SPBS setup time.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER INC.

TW/USPS-T10-10 Roughly what is the daily volume of sacked or palletized bundles, requiring a given sort scheme, e.g., outgoing primary, that a given facility would need before it becomes economical to set up a separate SPBS sort scheme for such mail, rather than sorting the volume at a manual opening unit?

Response:

This volume has not been quantified. However, it depends on a number of factors specific to the local site. Things to be considered when determining if a specific volume of mail justifies SPBS processing are the length of time it takes to prepare the machine, the SPBS versus manual productivities, the number of separations required, the staffing available, and the clearance time of the mail.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF TIME WARNER INC.

TW/USPS-T10-11 Please define the terms "postal pak" and "gaylord" as used in the Postal Service today, including differences between the types of containers each term describes. Please also describe the current uses of each container type, by the Postal Service and by different types of mailers. In particular, please answer the following:

a. When a mailer prepared gaylord/postal pak containing for example presorted parcels has been emptied of its contents at the destinating facility, what is the further disposition of the gaylordl postal pak? Will it be: (1) returned to the mailer or another mailer with the surrounding cardboard still on it; (2) returned as an empty pallet to the mailer or another mailer; (3) reused in postal operations to transport mail; (4) destroyed; or (5) other disposition? If more than one answer applies, please indicate roughly how often each would apply.

b. In which types of facilities and between which types of facilities are the Postal Service's own postal paks used to transport mail?

c. What is the minimum and maximum height of the surrounding cardboard on a USPS postal pak/gaylord?

d. What is the minimum and maximum thickness of the surrounding cardboard on a USPS postal pak/gaylord?

e. What is the replacement cost of the surrounding cardboard on a USPS postal pak/gaylord?

f. On the average, how many times is a USPS postal paklgaylord reused before the cardboard is replaced?

g. Assume that a USPS prepared postal pak/gaylord arrives at a delivery unit and that there is no mail to put in it for the return trip. What would be the disposition of the postal paklgaylord in that case?

h. Assume that a postal pak/gaylord arrives at a destinating facility which has no equipment for dumping of such large containers. Is it reasonable to assume that the surrounding cardboard in that case would be removed or destroyed in order to gain access to the mail inside? If not, please explain.

Response:

A "postal pak" is a triple-wall corrugated fiberboard container 44 inches wide by 48 inches long by 69 inches high used by and procured nationally for the Postal Service and is used primarily to ship bulk mail in the BMC network. A "gaylord" is

a corrugated fiberboard box that ranges in height from 36, 48, 60, to 72 inches. Gaylords can be constructed of single-wall, double-wall, or triple-wall corrugated fiberboard. The terms, gaylord and postal pak, are often used interchangeably for any type of pallet box. These boxes have a common footprint of 40 inches wide by 48 inches long.

a) The mailer prepared gaylord/postal pak is placed on a USPS furnished pallet that is the base of the container. (1) The corrugated fiberboard box normally will not be returned to the mailer. (2) The pallets will not be returned to the original mailer but will be sent to the Mail Transport Equipment Service Center (MTESC) to be reused by the Postal Service or another mailer. (3) The box may be used by the Postal Service. (4) The box will not be destroyed; it will be recycled. (5) The box may be sent to one of our MTESCs where it will be recycled or reused.

b) Postal paks are used in the BMC network and to transport mail between a BMC and P&DC down to smaller offices and delivery units.

c) The minimum height is 36 inches and the maximum height is 72 inches.

d) The minimum wall thickness of the postal pak/gaylord is .125 inches and the maximum wall thickness is .70 inches.

e) The current cost of a postal pak is $18.00 and the current cost of a gaylord ranges in price from approximately $5.00 to $8.00.

f) Because the postal paks are triple-walled, they are used appoximately 40 times before replacement. The gaylords, which are often single–walled, are intended for a one time use and the cardboard is not usually replaced.

g) Sometimes the postal pak or gaylord (if serviceable) will be used to store empty sacks which will be returned to the MTESC for the sacks and postal paks (if warranted) to be processed and for the gaylords to be recycled.

h) Yes.

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: 4-5-2022

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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April 5, 2000