

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 THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO UPS INTERROGATORY
REDIRECTED FROM WITNESS MEEHAN
(UPS/USPS-T11-25)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatory of the United Parcel Service redirected from witness Meehan: UPS/USPS-T11-25, filed on March 23, 2000. The filing of this response should render moot the April 27, 2000 UPS motion to compel a response.

Each 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


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April 28, 2000

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

UPS/USPS-T11-25. Refer to page 36 of the testimony of Postal Service witness Raymond, USPS-T-13, at 36. Witness Raymond defines one of the activities included in street support as obtaining and loading the vehicle. For each of the following questions, provide any written documentation or guidelines that support the response.

(a) What are the activities that the carrier is doing at the vehicle?

(b) What is the typical order of preparing/organizing Priority Mail for the route? Does the carrier sort Priority Mail for the route in the carrier station or in the vehicle?

(c) What is the typical order of preparing/organizing Express Mail for the route? Does the carrier sort Express Mail for the route in the carrier station or in the vehicle?

(d) What is the typical order of preparing/organizing the letters for the route? Does the carrier sort the letters for the route in the carrier station or in the vehicle?

(e) What is the typical order of preparing/organizing flats for the route? Does the carrier sort the flats for the route in the carrier station or in the vehicle?

(f) What is the typical order of preparing/organizing parcels for the route? Does the carrier sort the parcels for the route in the carrier station or in the vehicle?

(g) How does the carrier know that a particular stop has a parcel, e.g., does the carrier organize the vehicle to reflect parcels at particular stops?

(h) Suppose there are a number of large parcels for a given route, and the carrier has to make several trips to the vehicle to load the parcels and has to spend more time organizing the parcels in the vehicle.

(i) To which category-load, access, route, or office - are these activities assigned?

(ii) Are these activities specifically distributed to parcels?

RESPONSE

(a) The definition of Street Support Time is found in the Summary Description of USPS Development of Costs by Segments and Components, page 7-2: The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes. Based on my observations, the carrier unlocks the vehicle, starts it up, and relocates the vehicle to the

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loading dock. The next step is to open the back of the vehicle and load in trays and tubs of mail along with the parcels. Other activities at the vehicle include loading trays of mail into the passenger side of the vehicle, organizing and prepping mail in the vehicle.

(b – c) Based on my observations, the carrier receives the Priority and/or Express mail from a roving accountable person/desk or by going to an accountable cage. Typically, the carrier cases these products with the other cased mail in delivery sequence. There are occasions where the carrier completes USPS form 3883 in the office that will allow a customer to sign one form and receive multiple pieces. Priority and Express mail are sorted in the office not in the vehicle.

(d) Letters are delivered to the carriers casing area. Approximately four feet of non-DPS letters are placed on the ledge of the casing equipment for the carrier to start casing upon arrival at the case. As the sorting/casing of letters into delivery sequence continues the carrier will replenish the supply of non-DPS letters on the ledge from tubs/trays of mail that have been delivered to the carrier work station/case. All letters are sorted into delivery sequence in the station (except mail for delivery at centralized locations, "jackpotting", and DPS letters). The carrier-sequenced mail and DPS letters are organized in the delivery vehicle for ease of handling at each stop.

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(e) Flats are delivered to the carriers casing area. Based on my observations, approximately six feet of flats are placed in a vertical flat receptacle adjacent to the casing equipment. Additional flats are located in tubs at the carriers' casing area. The carrier will obtain six inches or more of flats from the flat receptacle, place them on her arm, and then start casing into delivery sequence. As the sorting of flats continues, the carrier will replenish the supply of flats from the vertical flat receptacle or from tubs of flats at the carrier work station/case. All addressed flats are sorted into delivery sequence in the station (except flats for centralized delivery, or "jackpotting.")

(f) Based on my observations, after the carrier has completed the casing of letters and flats, the carrier will walk to a central area and obtain a hamper that contains the parcels for the route. The carrier places the trays/tubs of letters-flats-Express and Priority mail into the hamper on top of the parcels. The hamper is then moved to the clock area and the carrier clocks to the street. The hamper is relocated to the DPS area and trays of DPS are placed on top of the load. The carrier relocates the hamper to the back loading dock, goes and obtains the vehicle, or relocates the hamper directly to the vehicle. Typically, due to the small number, the carrier does not sort parcels.

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(g) During the vehicle loading process the carrier places the parcels in the vehicle in route-zone groupings. The carrier remembers where the first parcel is to be delivered. When collecting the first parcel for delivery, the carrier checks to see where the next parcel is to be delivered. As each parcel is collected for delivery the next parcel is checked to determine its delivery address and this process continues until all parcels are delivered.

(h)

(i) The times for these activities are included in street support.

(ii) No. Return trips for parcels are distributed in the same way as return trips for all other mail.

DECLARATION

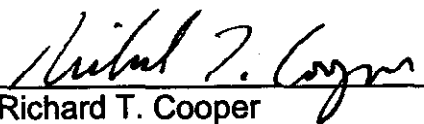
I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 4-28-00

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.


Richard T. Cooper

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