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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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  
THE MCGRAW-HILL COMPANIES, INC.  
(MH/USPS-T10-23(a), 24, 25, and 27-30)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of The McGraw-Hill Companies, Inc.: MH/USPS-T10-23(a), 24, 25, and 27-30, filed on May 5, 2000. Objections to interrogatories MH/USPS-10-23(b) and 26 were filed on May 15, 2000.

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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May 23, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO FOLLOW UP INTERROGATORIES OF McGRAW-HILL COMPANIES INC.**

**MH/USPS-T10-23** With reference to your response to MH/USPS-T10-12(f):

- (a) Please describe fully each of the "seven other 'indicators'" designed to "focus the field to improve productivity," state when each of those indicators was first utilized for that purpose and provide any and all reports tracking such indicators in FY 1999 and/or FY 2000.
- (b) Please provide a copy of all "instructions to the field re-stating national policies concerning FSM utilization, maximizing automation processing, and the proper staffing for all FSM operations" (USPS-ST-42, p, 20), issued in FY 1999 and/or FY 2000.

**Response:**

- (a) As mentioned in my response to MH/USPS-T10-12(f), the focus to improve productivity began to be discussed in AP 6, FY 99. In addition to FSM utilization, the seven other indicators are as follows:

1. DPS %
2. Moving manual letters to automation
3. DPS savings LDC 21 (city carrier)
4. SEI LDC 22 (street efficiency indicator – city carrier)
5. LDC 45 control (window operations)
6. Complement
7. Cost of extra HCR trips

Since the reference to MH/USPS-T10-12(f) deals with flats, the only indicator pertaining to flats is the FSM utilization. Please see response to Hearing Question 2 – MH which provides a chart tracking FSM utilization trends for FY 1999 and FY 2000.

- (b) Objection filed.

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**MH/USPS-T10-24** With reference to your response to MH/USPS-T10-13(b), attributing the decline in productivity in automation flats processing to (among other things) increased BCR usage on FSM 881s and reclassification changes related to the separation of barcoded and non-barcoded flats:

- (a) Has the rate of rejects in FSM/BCR operations increased over time? If so, please produce substantiating data. If not, please explain how increased BCR usage has contributed to the accelerating trend (from 1994 through 2000) of declining productivity in automation flats processing.
- (b) Please explain how the separation of barcoded and non-barcoded flats by mailers has contributed to accelerating trend of declining productivity in automation flats processing.

**Response:**

- (a) Read rejects are not isolated in our national databases. However, read rejects are an expected consequence of processing flats in the BCR mode. As the number of flats processed in the BCR mode has increased, there has been a proportional increase in read rejects. If, for example, 5% of the barcoded pieces are read rejects, the assumption is that most of these pieces would have been sorted properly in the keying mode. So, increasing the portion of flats that are BCR read rejects results in an incremental decline in FSM 881 TPH productivity.
- (b) The separation of barcoded and non-barcoded flats has created additional workhours used to segregate and prepare the flats for FSM processing. A significant portion of these activities is occurring at the FSMs, and, consequently, the workhours are charged to the FSM operations. This additional time spent to prepare the flats is, therefore, negatively affecting

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automation flats productivity. Also, the split mailstream has created smaller processing runs on the equipment. As the runs become shorter, the percentage of time spent changing schemes and preparing the flats sorter for a new processing run increases, which decreases the productivity.

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**MH/USPS-T10-25** With reference to your response to MH/USPS-T10-13(d), please provide the average productivity (PPH) of the FSM 1000 for AP 5/FY 00, in keying mode and in BCR mode, respectively.

**Response:**

For AP 5 - FY 00, the productivity was:

Keyed – 570.0

BCR – 1027.4

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**MH/USPS-T10-27** In response to MH/USPS-T10-14(b) ("Do you believe that the decline in FSM 881 productivity may reflect an increased focus on service for Standard A mail, as indicated in the response of witness Smith to DMA/USPS-T21-2(e)? Please explain your answer fully"), you responded that witness Smith, in his referenced interrogatory answer, "did not link FSM 881 productivity and service." However, witness Smith in fact stated in response to DMA/USPS-T21-2(e): "I am told that the decline in FSM 881 productivity may reflect the increased focus on service." See also response to DMA/USPS-T21-2(c) (increase in Standard A processing costs reflects, among other things, "the decline in FSM 881 productivity [which in part] is likely a result of the increased focus on providing service"). Accordingly, please provide a responsive answer to MH/USPS-T10-14(b).

**Response:**

See TR 5, page 2051, lines 4-25, and page 2052, lines 1-19, which refer to what, I believe, to be the primary reasons for the decline in FSM 881 productivity. Also see TR 5, page 2053, lines 14 – 25, and page 2054, lines 1-16 which refer to DMA/USPS-T21-2 ( Witness Smith) and the concerns relating to decreasing flat sorting productivity.

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**MH/USPS-T10-28** With reference to your response to MH/USPS-T10-15, concluding that according to LR-I-87 data, 29.31 percent of Periodicals Regular, Science of Agriculture, and Nonprofit is barcoded, machinable, and non-carrier route, please either confirm the following calculations based on LR-I-87, Tables 6 and 7, or explain why you cannot confirm:

- (a) Total volume of Periodicals Regular, Science of Agriculture, and Nonprofit flats reflected in Tables 6 and 7 is approximately 9.331 billion pieces.
- (b) Of that volume, the total of barcoded, machinable, non-carrier route pieces is approximately 3.196 billion pieces.
- (c) Those barcoded, machinable, non-carrier route pieces comprise approximately 34.3 percent of the total volume reflected in Table 6 and 7.
- (d) To the extent that you do not confirm in response to subparts (a)-(c) above, please provide the calculations underlying the 29.31 percentage figure provided by you.
- (e) Please explain fully the basis on which you conclude that USPS LR-I-87 is based on FY 1999 data, rather than FY 1998 data, and provide supporting references from USPS LR-I-87.
- (f) Please confirm that the term "machinable", as used in LR-I-87 (and as indicated on p. 118 thereof), includes mail that can be processed only on the FSM 1000 as well as mail that can be processed only on FSM 881. If you do not confirm, please explain fully.

**Response:**

- (a) Confirmed; the total volume is 9.332 billion pieces.
- (b) Not confirmed. The total volume of machinable, barcoded, non-carrier route flats is 2.686 billion pieces. This is calculated by summing barcoded, machinable flats volumes in sacks and on pallets while excluding *all* carrier route volumes from Tables 6 and 7, pp. 21-26.

It appears that 3.196 billion pieces is calculated by summing barcoded, machinable flats volumes in sacks and on pallets while excluding carrier route

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volumes *only* in carrier route and carrier routes sacks. The 193,967,700 carrier route pieces on 3-digit pallets in Table 6, page 22, for example, should also be excluded.

- (c) Not confirmed. Machinable, barcoded, non-carrier route pieces comprise 28.78% (2.686 billion divided by 9.332 billion) of the *total* volume reflected in Tables 6 and 7.
- (d) 29.31% is calculated by excluding the Bedloaded Bundles and Other Containers volume of 166,876,880 pieces (Table 6, pg. 21 and Table 7, pg. 24) from the total volume. Hence, 2.686 billion divided by 9.165 billion equals 29.31%.
- (e) USPS LR-I-87, Periodicals Mail Characteristics Study, is based on FY 1999 data because the study sampled data in June and July 1999. Please refer to USPS LR-I-87, Section III, pg. 12. Hence, USPS LR-I-87 reflects the mail characteristics within that FY 1999 sampled data.
- (f) Not confirmed. USPS LR-I-87 defines "machinable" flats as flats that meet the FSM 881 processing criteria in DMM § C820. Nonmachinable flats are all other flats. Hence, "mail that can be processed only on the FSM 1000" is considered nonmachinable.



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**MH/USPS-T10-29** Please produce the February 2000 survey of Area Managers of In-Plant Support referred to in your response to MH/USPS-T10-17, along with any and all other written materials relied upon in formulating your responses to MH/USPS-T10-7 and/or MH/USPS-T10-17, or relevant thereto.

**Response:**

The survey results consisted of a spreadsheet from each Area Manager. A redacted copy of each spreadsheet, omitting site identification information, is attached.

Area	Facility ID	Post Office	Unit Name	Street Address	Zip Code	Ownership	Class & Type of Mail Processed (Origin)	Type of Processing Equip Used for Orig	Total Sq Ft Used for Orig	Class & Type of Mail Processed (Destining)	Type of Processing Equip Used for Dest	Total Sq Ft Used for Destining	Total Processing Sq Ft	Total Facility Sq Ft
Allegheny			Main PO Annex											
Allegheny			Main PO Annex											
Allegheny			P&DC Annex				None			2c, Standard B	SPBS, racks	29180	47,300	
Allegheny			BMC											
Allegheny			P&DC Annex				Periodicals	SSM, SPBS, (2), Manual		Periodicals	SSM, SPBS(2), Manual	447021	537023	
Allegheny			P&DC Annex				None	NA		(1) DPS Letters (2) Incoming Standard Flats	(1) ECA-DBCS (12), (2) Rolling Stock	31000	44000	NA
Allegheny			Main PO Annex											
Allegheny			P&DC Annex				FCM, Standard B	SPBS, LIPS		Priority, Standard A, Periodicals	SPBS, LIPS	141821	180000	13488
Allegheny			Mail Proc Annex				Priority and Standard B	Manual		All classes	Manual	7000	14800	500
Allegheny			P&DC Annex				Standard A/OG	Manual		Standard A/Standard B	Manual	16019	23800	
Allegheny			Mail Proc Annex				None	N/A		Standard A letters	DBCSs	N/A	98000	
Allegheny			Mail Proc Annex				All classes	SPBS		All classes	SPBS	23000	209284	
Allegheny			Main PO Annex											
Allegheny			Mail Proc Annex											
Allegheny			Mail Proc Annex				None	N/A		Inc Sec all classes	None	N/A	6,410	

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Capital Metro			BMC			Leased	Std B	Manual Ops.		NA	NA	38400	38020	NA
Capital Metro			P&DC Annex			Leased	All Priority, 1-C SPRs	SPBS		1-C Flats, 1-C Ltr bundles, Periodicals, Std "A" & "B"	SPBS, FSM	48000	55435	59,735
Capital Metro			P&DC Annex			Leased	NA	NA		Std. A (crt) Std. B (P. Post)	NA	5214	24,900	29,700

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Great Lakes			Post Office Annex			Owned								
Great Lakes			Hub			Leased								
Great Lakes			AMC Temp			Leased								
Great Lakes			AMC Annex			Leased								
Great Lakes			BMC Annex			Owned	Periodicals	Sack Sorter, SPBS					250,000	1,000,000
Great Lakes			Mail Proc. Annex			Leased	PER, STD-A, Flats/SPR	SPBS, FSM 1000, Manual Setups		PER, STD-A, Flats/SPR	SPBS, FSM 1000, Manual Setups	50,000	129,000	
Great Lakes			Priority Annex			Leased								
Great Lakes			Temp. XMAS Annex			Leased								
Great Lakes			P& DC Annex			Leased	Std A, Periodicals	SPBS, DBCS, FSM 1000		Std A, Periodicals	SPBS, DBCS, FSM 1000		28,218	65,879
Great Lakes			P& DC Annex				FC, STD A	DBCS						56,022
Great Lakes			P& DC Annex							FC, STD A	DBCS			48,400

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Facility ID	Post Office	Unit Name	Street Address	Zip Code	Ownership	Class & Type of Mail Processed (Origin)	Type of Processing Equip Used for Orig	Total Sq Ft Used for Orig	Class & Type of Mail Processed (Destinating)	Type of Processing Equip Used for Dest	Total Sq Ft Used for Destinating	Total Processing Sq Ft	Total Facility Sq Ft
MAA		P& DC Annex			Owned	Priority, 1st Class, Periodicals and Standard B Mail.	2-881, 2-1000, and 4-LIPS (Double- Decker)	40,000	Priority, 1st Class, Periodicals and Standard B Mail.	2-881, 2-1000, and 4-LIPS (Double - Decker)	40,000	40,000	88,000
MAA		P& DC Annex			Leased	Standard and Periodicals	SPBS,LIPS,FSM	77,300	Standard and Periodicals	SPBS,LIPS,FSM	77,300	77,300	81,300
MAA		P& DC Annex			Leased	Priority, Periodicals and Standard B Mail.	SPBS,881,1000	45,000	Priority, Periodicals and Standard B Mail.	SPBS,881,1000	45,000	45,000	83,000
MAA		P& DC Annex			Owned	Priority, Standard A & B	SPBS		Priority, Standard A & B	SPBS		50,000	83,000
MAA		Mail Proc. Annex			Owned	Priority,Flats, Periodicals, Standard-A	SPBS,FSM,		Priority,Flats, Periodicals, Standard-A	SPBS,FSM,		37,000	78,000
MAA		P& DF Annex			Owned	Priority,Flats, Periodicals, Standard-A&B,	LIPS,FSM 1000,881		Priority,Flats, Periodicals, Standard-A&B,	LIPS,FSM 1000,881		83,000	124,000
MAA		P& DC Annex			Leased	Periodicals, Standard-A	LIPS		Periodicals, Standard-A	LIPS		32,000	32,000

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Mid West			P&DC Annex			Leased	Priority, 2C-MOIL, 1C Lk Trays, Std A	SPBS,LIPS	None	NA		126642	126642	
Mid West			MTE			Leased	MTE & Storage							
Mid West			SCF Annex			Leased	None	NA		1C and Standard	Manual Only	17225	19142	
Mid West			Post Office Annex			Leased	None	NA		1C and Standard	3 - CSBCS	4800	19,200	
Mid West			Post Office Annex			Leased	None	NA		Periodicals & Standard	Manual Only	1250	1250	
Mid West			Post Office Annex			Leased	Priority, FCM Sprs	SPBS		Priority, 1C Sprs	SPBS	130000	150,000	
			same as above				Periodicals,Std A			Periodicals,Std A, Parcel Post				
Midwest			P&DC Annex			Leased	Priority Mail - All	2 SPBS, 1 LIPS		Priority Mail - All	2 SPBS, 1 LIPS	85900	137,000	
Midwest			same as above			Leased	FCM Presort	5 Robots		553 PERS,3D,SCF,ADC 554 PERS, 3D	5 Robots	171181	306,067	
			same as above				Priority Mail	3 SPBS, 1 LIPS		553 0M,3D,SCF,ADC 554 0M, 3D, SCF	3 SPBS, 1 LIPS			
Midwest			AMC Annex			Leased	Priority,FCM	Manual Operations		Priority,FCM	Manual Operations	4700	5,000	
			same as above				Load/Unload A-2 dedicated st			Load/Unload A-2 dedicated st				

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Ny Metro			P&DC Annex			Owned	NONE	NONE	N/A	parcel post, standard A, B	SPBS, PSM	38700	38,700	58,564
Ny Metro			Post Office Annex			Owned	CARRIER / FINANCE STATION	N/A	N/A	N/A	N/A	N/A	N/A	13,969
Ny Metro			Post Office Annex			LEASED	LAND LEASE FOR CARRIER/FINANCE STATION	N/A	N/A	N/A	N/A	N/A	N/A	68,825 SQ.FT. SITE
Ny Metro			Mail Proc. Annex			Leased	NONE	NONE	N/A	1C, Standard A	DBCS	41898	41898	51,333
Ny Metro			MTE			Leased	MTE EQUIP.AMO SHOP, MISC STORAGE	N/A	N/A	N/A	N/A	N/A	N/A	71,000
Ny Metro			P&DC Annex			Leased	STANDARD A/B ; MTE EQUIPMENT SACK VIDES STAG	MANUAL	33,566 - STAND A/B 16,784 - MTE/SACKVIDES	STANDARD B	MANUAL	33,566	67,132	83916
Ny Metro			Mail Proc. Annex			Leased	NONE	NONE	N/A	Periodicals, Std A/B Flats, Sprs and Bundle Letters, MISC STORAGE	FSM881&SPBS	60,000 - Periodicals, Std A/B Flats, etc. 40,000 - STORAGE	60,000	100,800
Ny Metro			Post Office Annex			OWNED	H.R. ANNEX FOR HIRING/TESTING	ADMIN SERVICES - TRIBORO DISTRICT	CARRIER ANNEX FOR OZONE PARK					82,067
Ny Metro			P&DC Annex			Leased	NONE	NONE	N/A	Periodicals /Standard A / B Bulk Mail Unit : Retail	Manual	7000 sq ft	7,000	25,000
Ny Metro			P&DC Annex			LEASED	PARCEL POST DISTRIBUTION	CARRIER ANNEX	N/A	N/A	N/A	N/A	N/A	11,310
Ny Metro			Post Office Annex			Leased	NONE	NONE	N/A	1C Standard A - LS CARRIER / FINANCE STA	2 - DBCS	5,000	5,000	15,000
Ny Metro			Post Office Annex			Owned	NONE	NONE	N/A	Std B	Manual	8,900	8,900	59,334
Ny Metro			Post Office Annex			Leased	CARRIER / FINANCE STATION	N/A	N/A	N/A	N/A	N/A	N/A	23,612
Ny Metro			Post Office Annex			Leased	NONE	NONE	N/A	1C/StdA/Periodicals	Manual	4800 sq ft	4,800	17,324
Ny Metro			Post Office Annex			OWNED	NONE	NONE	N/A	1C/StdA/Periodicals	Manual	3375 sq ft	3,375	16,744
Ny Metro			Post Office Annex			LEASED	CARRIER STATION	N/A	N/A	N/A	N/A	N/A	N/A	4,453

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Northeast			Annex			Leased	none	none	none	none	0	5000	No mail processing	
Northeast			Mail Proc. Annex			Owned	FCM/STD A	MK2/BCS/OCR/FSM	FCMNEWS/STDA		MK2/BCS/OCR/FSM	15000	19,733	AMP Processing Center for ZIP 129
Northeast			Priority Annex			Leased								
Northeast			Mail Proc. Annex			Leased	Standard A	SPBS		Standard A,periodicals	SPBS	60000	90000	Works ADC. scf Pallets
Northeast			BMC Annex			Owned	Standard A trays	Power Equipment - N		Standard A - Trays	Power Equipment	44840	50000	WORKS 11 days to BMC / SCF containers (includes OTRs)
Northeast			Mail Proc. Annex			owned	none	none		StdA/News	LIPS/SPBS	12000	31,000	Part of Admin Building
Northeast			Mail Proc. Annex			owned	none	none		StdA/News	1 LIPS	6000	7,585	opens & Process flat bundles on pallets for 067-088
Northeast			AMC Annex			leased	none	none	none	none		0	58,484	MTE storage - used as off load facility during
Northeast			P&DC Annex			owned	none	none		FCM/StdA DPS	3 DBCS / CSBCS	8000	174,016	Carrier DPS Facility - (This facility is part of a development project and will be sold off in the next two years.)
Northeast			MTE Warehouse			Leased	none	none	none	none		0	58,000	District Warehouse & MTE storage space
Northeast			P&DC Annex			owned	Std A/News FLTS	SPBS/FSM		StdA/News	SPBS/FSM	30000	83,000	30,000 ADMIN Storage.



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Pacific			Carrier Annex			Owned								
Pacific			Carrier Annex			GSA	N/A	N/A	N/A	N/A	N/A	Unknown		
Pacific			Carrier Annex			Leased								
Pacific			Annex and VMF			Owned								
Pacific			P&DC Annex			Owned	Std A, Pref, Priority	SPBS, FSM 881 & 1000		Flats (all classes) & Priority	SPBS, FSM 881 & 1000	64000 (6400 for PERIODICALS)	80,000	
Pacific			P&DC Annex			Owned	None	N/A		F-1 DPS Letters (7 Zones) NO PERIODICALS PROCESSED	DBCS's	20000	175,000	
Pacific			P&DC Annex			GSA	None	N/A		Periodical Bundles	SPBS	19711	80,000	
Pacific			Carrier Annex			Leased	None	None		1st Class / Std A	DBCS machines	35,400 sq. feet	126,766 sq. feet	
Pacific			Priority Annex			Leased								
Pacific			International			LEASED				International	Model 89	48000	53,000	
Pacific			Priority Annex			Leased	Priority	Model 89 Conveyors		N/A	N/A	22140	22,140	
Pacific			Priority Annex			Leased	Priority, FCM	SPBS, FSM 1000, DBCS, SPBS		Priority, FCM	SPBS, FSM 1000, DBCS, SPBS	91000	91,000	
Pacific			Military Annex			Leased	None	None		Military, all classes	None	57000	57,000	
Pacific			Old P&DC			Owned								

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Southeast			P&DC Annex			Leased	Pri, Std, Flts	SPBS (2), FSM (3)		Pri, Std, Flts	SPBS (2), FSM (3)	93500	178,000	
Southeast			BMC			Leased	Std A Flats	SPBS (3)		Std A Flats	SPBS (3)	85030	100000	
Southeast			P&DC Annex			Leased	FCM,Per,STD A/B	SPBS (2)		FCM,Per,STD A/B	SPBS (2)	30800	105,563	
Southeast			P&DC Annex			Leased	Pri, 1C,2C,3C/Flts	SPBS,FSM		Pri, 1C,2C,3C/Flts	SPBS,FSM	30768	35,478	
Southeast			P&DC Annex			Leased	FCM,Express,PRI	none		FCM,Express,PRI	none	4000	5,000	
Southeast			P&DC Annex			Leased	FCM,Per,STD A/B	SPBS		FCM,Per,STD A/B	SPBS	42000	42,000	
Southeast			P&DC Annex			Leased	Std A & B	MPBCS,FSM1000,SPBS		Std A & B	MPBCS,FSM1000,SPBS	46000	46,000	
Southeast			P&DC Annex			Leased	Priority	LIPS (1)		Std A Ltrs & Flts	LIPS (1)	30000	30,000	
Southeast			AMC Annex			Leased								
Southeast			BMC Annex			Leased	none	none		none	none			
Southeast			BMC Annex			Leased	Standard	robots		Standard	robots	52430	73,250	
Southeast			Priority Annex			Leased								
Southeast			P&DC Annex			Leased	FCM & Std Flts	SPBS FSM1000		FCM & Std Flts	SPBS FSM1000			

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Area	Facility ID	Post Office	Unit Name	Street Address	Zip Code	Ownership	Class & Type of Mail Processed (Origin)	Type of Processing Equip Used for Orig	Total Sq Ft Used for Orig	Class & Type of Mail Processed (Destinating)	Type of Processing Equip Used for Dest	Total Sq Ft Used for Destinating	Total Processing Sq Ft	Total Facility Sq Ft
outhwest			Mail Proc. Annex			Owned	**** this was a planned facility that, for a number of reasons, including the AMP of Greenville into the NTX MPC, did not reach fruition.							
outhwest			Post Office Annex			Leased	N/A	N/A		N/A	N/A	N/A	N/A	Vacant
outhwest			P&DC Temp. Annex			Leased	1c2c/STD-A/SPRs	FSM881/1000,LIPS		1c2c/STD-A/SPRs	FSM881/1000,LIPS	23984	85656	100772
outhwest			Temp. Annex			Leased	N/A - CFS Unit	N/A - CFS Unit		N/A - CFS Unit	N/A - CFS Unit	N/A - CFS Unit	N/A - CFS Unit	0
outhwest			P&DC Annex			Leased	1c2c/STD-A/PP	SPBS,FSM1000/DBS		1c2c/STD-A/PP	SPBS,FSM1000/DBS	48000	81000	90000
Southwest			P&DC Temp. Annex			Leased	1c/3c Flats, PP	FSM881/1000, SPBS		1c/3c Flats, PP	FSM881/1000, SPBS	400	69000	114195
Southwest			AMC Annex			Leased	Priority Mail	SPBS, LIPS		Priority Mail	SPBS, LIPS	0	66000	116480
Southwest			P&DC Annex			Leased	STD-A	SPBS		STD-A	SPBS	0	51000	59,303
Southwest			BMC Annex			Owned	This facility serves an auxiliary BMC, and is to be vacated 11-14-00.					0	0	108,600
Southwest			P&DC Annex			Leased	1c/ 2c Flats	FSM881/1000		1c2c/STD-A Flats	FSM881/1000	4533	15,197	22,000
Southwest			P&DC Annex			Leased	All non-letter opns	FSM881/1000		All non-letter opns	FSM881/1000	8500	54,000	100,000
Southwest			Priority Annex			Leased	Priority Mail	SPBS		Priority Mail	SPBS	0	60,000	64,000
Southwest			Mail Proc. Annex			Leased	2c/STD-A/Priority	SPBS		2c/STD-A/Priority	SPBS	5075	60,480	75,600
Southwest			Hub			Leased	PP	Manual		PP	Manual	0	60,000	64,000

Area	Facility ID	Post Office	Unit Name	Street Address	Zip Code	Ownership	Class & Type of Mail Processed (Origin)	Type of Processing Equip Used for Orig	Total Sq Ft Used for Orig	Class & Type of Mail Processed (Destinating)	Type of Processing Equip Used for Dest	Total Sq Ft Used for Destinating	Total Processing Sq Ft	Total Facility Sq Ft
Western			Mail Proc. Annex			Owned	All	none		All	None	8320	10443	450
Western			Mail Proc. Annex			Owned	All	none		All	None	7240	8,118	340
Western			Mail Proc. Annex			Leased	All	ES3		All	CSBCS	11500	26086	1684
Western			Mail Proc. Annex			Owned	ALL	MM, DBCS, LCOCR		ALL	DBCS,LCOCR	26000	41134	400
Western			P&DC Annex			Owned	none	none		FCM, STD A, PER	11-DBCSs	80000	475,154	1,200
Western			Delivery Annex			Owned	ALL(Local only)	none		ALL	6- DBCSs	3800	9419	600
Western			Mail Proc. Annex			Owned	ALL	MM, LCOCR, DBCS		ALL	LCOCR, DBCS	29000	58053	5800
Western			Delivery Annex			Leased	ALL(Local only)	none		ALL	none	4200	7012	2500
Western			Delivery Annex			Leased	ALL(Local only)	none		ALL	none	4000	6681	2,400
Western			P&DC Annex			Leased	Priority	none	Priority	none	0	81154	0	Priority Only
Western			Delivery Annex			Owned	All	MM (2), DBCS (2), MPBCS, FSM, SPBS	All	MM (2), DBCS (2), MPBCS, FSM, SPBS		34861	59,966	5,000
Western			Warehouse			Leased								

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO FOLLOW UP INTERROGATORIES OF MCGRAW-HILL COMPANIES INC.**

**MH/USPS-T10-30** With reference to your responses to MH/USPS-T10-18 and MH/USPS-T10-19, please produce a copy of the Strategic Improvement Guide for Flats Processing (Pub. 128) as it was originally issued in March 1998, before it was updated and reissued in September 1999 (as noted in USPS-ST-42, p. 19).

**Response:**

Please see USPS-LR-I-378.

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: 5-23-2000

**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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May 23, 2000