

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MAYES TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T37-15-23)

The United States Postal Service hereby provides responses of witness Mayes to the following interrogatories of United Parcel Service: UPS/USPS-T37-15-23, filed on August 4, 1997. Interrogatory UPS/USPS-T37-14 was redirected to the Postal Service.

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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August 18, 1997

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-15. Please provide a complete description of the following parcel shipper requirements to qualify for the DBMC discount:

- (a) Parcel volumes;
- (b) Parcel types (e.g., machinable, non-machinable, etc.);
- (c) Containerization and type;
- (d) Sortation;
- (e) Qualification and authorization;
- (f) Transportation equipment;
- (g) USPS entry facility;
- (h) Scheduling/notification of shipment delivery at entry facility;
- (i) Payment for mailing.

Response:

- (a) Please refer to DMM section E652.1.6
- (b) Please refer to DMM section C600.1.2
- (c) Please refer to DMM sections E652, especially E652.2, M045.8, and M630.1.2.
- (d) Please refer to DMM sections E652.2, E652.3, M630.1.2, and M045.8.
- (e) Please refer to DMM sections E652.3, E620.2.4.d, E652.1.4, and E613.2.2
- (f) Please refer to DMM section E652.2.0.
- (g) Please refer to DMM sections E652.3.2 and E652.4.
- (h) Please refer to DMM section E652.3.
- (i) Please refer to DMM sections E620.2.6, E652.1.4, E613.2.2, and D600.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-16. Referring to interrogatory UPS/USPS-T37-16, please provide a complete description of (a) through (i) for each of the following for a shipper to qualify for each of the following parcel post shipment discounts:

- (i) OBMC entry;
- (ii) BMC presort;
- (iii) DSCF dropship;
- (iv) DDU dropship.

Response:

The qualifications and mail preparation requirements which will be applicable to these new categories, beyond those contained in the proposed DMCS provisions are still in the development stage and have not yet been produced or finalized.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-17. Referring to page 2, line 23, page 8, lines 6 and 21, and page 10, line 9, of your testimony, please provide a detailed definition of "properly prepared" as used at each of these references.

Response:

Please refer to my responses to UPS/USPS-T37-15 and 16.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-18. Referring to page 10, lines 13 to 23, of your testimony, what will be the "properly prepared" requirements for DDU dropship mailings?

Response:

Please refer to my response to UPS/USPS-T37-16.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-19. Referring to page 8, lines 22 and 23, of your testimony, please provide copies of all current publications and documentation defining machinable and non-machinable parcels.

Response:

Please refer to DMM sections 620.2.5 and C050.

RESPONSE OF POSTAL SERVICE WITNESS MAYÉS TO UPS INTERROGATORIES

UPS/USPS-T37-20. Referring to pages 7-10 of your testimony,

- (a) Please provide a detailed description of the rules for assigning and determining the originating 5-digit zip code for each of the following:
 - (i) DBMC;
 - (ii) OBMC entry;
 - (iii) BMC presort;
 - (iv) DSCF dropship;
 - (v) DDU dropship.
- (b) Please provide an example of each of these rules using actual postal facilities and zip codes for (a) (i)-(v).

Response:

- (a) I was unable to identify any data system in Postal Service headquarters that makes use of an originating 5-digit ZIP Code for DBMC. I have been informed by coordinators and managers of several data systems that the originating 3-digit ZIP Code is used to determine the zone associated with the parcel. Thus, I am unable to provide the information requested.
- (b) Not applicable.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-21. Referring to page 18, lines 4-5, of your testimony, please provide a detailed explanation and copies of all analyses and documentation supporting the determination of the 108 inch maximum combined length and girth for parcel post pieces.

Response:

Please refer to Docket No. MC83-1, Uniform Parcel Size and Weight Limitations.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-22. Referring to page 18, line 13, of your testimony, please provide a detailed explanation and copies of all analyses and documentation supporting the determination of the 130 inch maximum combined length and girth for parcel post pieces.

Response:

I am aware of no analyses or documentation supporting the determination of 130 inches as the proposed maximum combined length and girth. It is my understanding that, similar to the reasons put forth in Docket No. MC83-1 for changing the maximum combined length and girth to 108 inches, the determination of the proposed maximum of 130 inches was based on the repeated requests of parcel mailers, with reference to the limit currently applied by United Parcel Service.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES


UPS/USPS-T37-23. Referring to page 1, lines 14 and 15, of your testimony, please provide a legible copy of the most recent map of the National Bulk Mail System showing the designated geographical boundaries of all BMCs and ASFs. Note all changes to make the map current.

Response:

A copy of the most recent map of the National Bulk Mail Center Network is being filed as Library Reference H-233. The ZIP Code areas served by each of the BMCs and ASFs shown on the map are provided in DMM section E620 in Exhibit 2.4.

DECLARATION

I, Virginia J. Mayes, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


Virginia J. Mayes

Dated: August 18, 1997

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.



Scott L. Reiter

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