RECEIVED

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

SEP 3 4 32 PM '97

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE AMERICAN BUSINESS PRESS (ABP/USPS-1-15)

The United States Postal Service hereby provides responses to the following interrogatories of the American Business Press: ABP/USPS-1-15, filed on August 20, 1997.

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

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2997; Fax –5402 September 3, 1997

ABP/USPS-1

Identify the person or person(s) under whose direction USPS-LR-H-111, "Dropship Savings in Periodicals and standard Mail (A)" was prepared, whether or not that person(s) is a witness in this case. If the person under whose direction USPS-LR-H-111 was prepared is not a current witness in R97-1, identify any USPS witnesses who are qualified to respond to discovery about the assumptions and underlying data which support the final data presented.

RESPONSE:

Price Waterhouse prepared USPS LR-H-111 under the direction of the office of Product Finance within the Postal Service. Questions regarding the library reference may in the first instance be directed to the Postal Service.

ABP/USPS-2

- [a] Was the update of data affecting Standard A Mail in Docket MC95-1, referred to on p.1 of USPS-LR-H-111, performed by a current USPS witness in Docket R97-1? If a R97-1 witness updated the data, who is that witness or witnesses, and if someone else performed the update, who is that person(s)?
- [b] If the data affecting periodicals in Docket MC95-1 by Witness Byrne, referred to on p.1 of USPS-LR-H-111, has been updated by a USPS witness in Docket R97-1, who is that witness, and is the "new input data and update of parameters" (USPS-LR-H-111, p.1) included in the testimony of that witness? If the update was not done by a USPS witness in this case, who performed the update?

RESPONSE:

- a) The sources of the data used in developing Standard Mail (A) destination entry discounts in USPS LR-H-111 are documented in the library reference itself through use of citations. Examples include USPS-LR-H-105, USPS-LR-H-77, and USPS-LR-H-146. Authors of these underlying sources of information include the Postal Service, its employees, and its consultants.
- b) The sources of data used in developing Periodicals destination entry discounts in USPS LR-H-111 are documented in the library reference itself through use of citations. Examples include USPS-LR-H-190, USPS-LR-H-77, and USPS-LR-H-146. Authors of these underlying sources of information include the Postal Service, its employees, and its consultants.

ABP/USPS-3

On p.2 of USPS-LR-H-111, three tables (2.1, 2.2, 2.3) are presented that display costs supposedly avoided by dropshipment of Standard Mail (A), Periodicals (Regular) and Periodicals (Nonprofit). Table 2.1 combines transportation and non-transportation avoided costs for Standard (A) mail, whereas Tables 2.2 and 2.3 describe only non-transportation costs avoided by periodicals. Why are transportation costs excluded in Tables 2.2 and 2.3?

RESPONSE:

Destination entry transportation costs avoided by Periodicals mail are accounted for separately by USPS witnesses Taufique (USPS-T-34) and Kaneer (USPS-T-35).

ABP/USPS-4

Given that Tables 2.2 and 2.3 do <u>not</u> include any transportation costs that may or may not be avoided by dropshipping, please explain, with cross-references to USPS testimony, exhibits and/or library references as necessary, the reasons why avoided costs shown in Table 2.2 for regular rate periodicals dropshipped to a DDU, instead of to an SCF entry, are 4.62 cents per pound less than costs avoided by dropshipment to an SCF, whereas according to Table 2.1 the similar avoided costs of Standard (A), regular rate mail, with bypass of the SCF and entry at DDU, are 2.74 cents per pound.

RESPONSE:

Library Reference USPS LR-H-111 is an update of the existing analyses used to determining destination entry discounts in both Periodicals and Standard Mail (A). In prior dockets, the methodology used to determine destination entry discounts in Standard Mail (A) differs from the methodology used in Periodicals. Because of these differences in methodology and input data, it is likely that the results of the analyses will differ. In Docket No. MC95-1, the difference between the costs avoided by DSCF and DDU in Standard Mail (A) was 2.52 cents per pound and the same difference in Periodicals was 2.86 cents per pound. The main reasons for the changes in the cost avoidance estimates are changes in the inputs, including pieces per pound, pieces per sack, pieces per pallet, and the proportion of mail on pallets and in sacks. Inserting the MC95-1 figures for pieces per sack and pieces per pallet lowers the cost difference between DDU and SCF entry to 3.60 cents per pound. Using the MC95-1 wage rate and proportions of mail on pallets and in sacks lowers the cost difference to 3.35 cents. Other input updates, such as pieces per pound and piggyback factors, also have an effect on the avoided cost difference.

ABP/USPS-5

On p.6 of USPS-LR-H-111, it is stated that the "methodology for developing the periodicals dropship cost avoidance is exactly the same as that used by Witness Byrne in Docket MC95-1 (USPS-T-1)."

- [a] Confirm that the parameters for productivities for BMC and SCF cross-docking operations used by Mr. Byrne in MC95-1 are identical to those that he developed for use in Docket R84-1, Exhibit USPS-T-14KK. If you do not confirm, what was the source of the productivities (units per man-hour) that he did use?
- [b] Why has USPS not updated productivities for BMC and SCF cross-docking operations for regular rate and nonprofit periodicals described at p.7 of USPS-LR-H-111, listed in detail on p.1 of Appendix F, and on p.1 of Appendix G?
- [c] Has the Integrated Mail Handling System (IMHS) had no positive effect on cross-docking or platform productivities since Mr. Byrne's testimony in MC95-1 (e.g. "Fiscal 1996 saw the installation of 640 pack loaders/unloaders...when completed in FY 1997, over 1,000 pieces of IMHS equipment will have been deployed to processing facilities." 1996 Comprehensive Statement on Postal Operations, p.47)?

RESPONSE:

a. Confirmed.

Periodicals were not updated.

- b. Due to the time and resource constraints, the productivity estimates for cross-docking
- c. No.

ABP/USPS-6

On p.6 of USPS-LR-H-111, the term "intermediate facilities" as entry points for periodical mail is used. Examples of these facilities are given as "transfer hubs" and "area distribution centers."

- [a] Define the term and identify all transfer hubs for periodicals.
- [b] Define and "area distribution center."
- [c] Since March 1995, when USPS filed its testimony in Docket MC95-1, has the definition a "transfer hub" or area distribution center changed, and has the function of these facilities changed as facilities where periodicals are cross-docked?
- [d] Please provide and identify all changes of locations of transfer hubs (for periodicals) and area distribution centers since 1995, and identify any new transfer hubs and/or ADCs since 1995
- [e] Are all transfer hubs and area distribution centers available for periodical origin entry? If not, how many are available, and how many are not?
- [f] Are some or all transfer hubs and area distribution centers (1) sectional/center facilities or (2) bulk mail centers? If the answer is affirmative in whole or in part, please list which transfer hubs are sectional center facilities and which are located in bulk mail centers.
- [g] Is periodical mail distributed in bulk mail centers or are the BMCs used solely for cross-docking of periodical mail?
- [h] Since 1995, has USPS issued any regulations that restrict (or expand) the availability of area distribution centers for periodicals to use as destination entry facilities?
- [I] What are "postal pak" containers and describe their use as periodical containers, for either sacks, bundles, or packages.

RESPONSE:

- a. A transfer hub is part of an internal USPS network that is used for routing direct containers (i.e., pallets, rolling stock, etc.) of Periodicals. A copy of the Periodical hub network is attached to the response.
- b. An Area Distribution Facility (ADC) is a facility that serves as a consolidation point for all classes of non-automation compatible letters and all flats that are destinating into a specific service area. All ADCs sort non-automation compatible letters and all flats to the SCFs in their service area.
- c. The definition of a "transfer hub" or ADC has not changed since the USPS filed its testimony in Docket MC95-1. The function of the ADCs has changed as a result of elimination of the SDC network. For instance, prior to the filing of Docket MC95-1, the SDCs were the

consolidation points for non-automated second- and third class letters and flats, and secondand third-class barcoded flats. As mentioned in the definition provided in 6(b), that workload is now processed in the ADCs.

- d. Since 1995, there have been numerous revisions to the labeling lists contained in the DMM including changes to the ADC list. However, these revisions do not necessarily pertain to changes of locations, but instead pertain to changes in the ADC's service area. In some cases, these changes could have resulted in a new entry to the ADC list. For instance, a new entry for Chicago became effective on 07/08/95. All revisions to DMM labeling lists are published in the *Postal Bulletin*. The following *Postal Bulletins* contain information related to labeling list changes since 1995: 21886, 21888, 21893, 21894, 21895, 21907, 21908, 21910, 21919, 21922, 21925, 21933, 21937, 21938, 21943, 21944, and 21949.
- e. The question is somewhat unclear because it asks about origin entry which is similar in spelling to original entry. Each publisher must maintain an original entry at the local Post Office that serves the publisher's known office of publication. If the question is asking whether all transfer hubs and ADCs are available for original entry, then the answer is no, because the 21 BMCs are not Post Offices. The ADCs, which are Post Offices, are available for original entry.
- f. All ADCs are SCFs. As for transfer hubs, see the list provided in 6(a). Any location that does not have BMC in its name is an SCF with the exception of the Chicago 2C Metro facility which is located within the Chicago BMC.
- g. While BMCs are generally used for cross-docking of Periodical mail, some may distribute containers of Periodical mail. As mentioned in (f), the Chicago 2C Metro facility is located within the Chicago BMC and distributes containers (e.g., sacks) of Periodical mail. However, BMCs do not perform piece distribution of Periodical mail.
- h. Yes, in the sense that the standards for additional entry were revised on August 1, 1996 in
 Postal Bulletin 21925. Publishers are no longer required to maintain an additional entry at

- post offices where Periodicals mail is deposited solely as plant-verified drop shipment (PVDS), so they now have more flexibility in planning their entry points for Periodicals.
- i. See USPS-T-29, p. 18 at n.53. "Postal Paks" are formed corrugated cardboard that are approximately 6 feet tall. They are part of the Integrated Mail Handling System (IMHS) and are used to transport trays, sacks, and machinable parcels between BMCs.

Periodicals Transportation Hub Network

NOTE: Hubs are for transfer of direct ADC containers and pallets only.

T	ADC Facility	7ID Codes Carved
Transportation Hub	ADC Facility	ZIP Codes Served
Atlanta BMC	ADC North Metro GA 301	298, 300-303, 305, 306, 308, 309, 311, 399
Atlanta bivio	ADC Macon GA 310	310, 312, 316-319
	ADC Birmingham AL 350	350-352, 354-359, 362
	ADC Montgomery AL 360	360, 361, 363, 364, 367, 368
	ADC Montgomery AL 300	300, 301, 303, 304, 301, 300
Buffalo PDC	ADC Buffaio NY 140	140-149
	ADC Syracuse NY 130	130-139
Chicago 2C Metro	ADC Milwaukee WI 530	498, 499, 530-532, 534, 535, 537-539,
Facility	400 Olivere II 00004	541-545, 549
	ADC Chicago IL 60821	600-611, 613-619
Cincinnati PDC	ADC Louisville KY 400	400-409, 411-418, 420-427, 471, 476, 477
	ADC Columbus OH 430	430-438, 456, 457
	ADC Cincinnati OH 450	410, 450-455, 458, 459, 470
	ADC Indianapolis IN 460	460-469, 472-475, 478, 479
Cleveland PDC	ADC Cleveland OH 440	439-449
Olovolatio i Do	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Denver BMC	ADC Billings MT 590	590-599, 821
	ADC Denver CO 800	800-816
	ADC Cheyenne WY 820	820, 822-831
	ADC Phoenix AZ 852	850, 852, 853, 855-857, 859, 860, 863
	ADC Albuquerque NM 870	865, 870-875, 877-884
Des Moines BMC	ADC Des Moines IA 50092	500-509, 520-528, 612
	ADC Sioux Falls SD 570	570-577
	ADC Omaha NE 680	510-516, 680, 681, 683-693
Detroit BMC	ADC Detroit MI 481	480-489
	ADC Grand Rapids MI 493	490-497
DV Doniola N 1.07000 *	ADC San Juan PR 006	006-009
DV Dameis No 07099		ernal USPS origin ZIPs 010-269)
*	* ADC San Juan PR 006	006, 007, 009
	** (For internal USPS origin ZIF	
	ADC DV Daniels NJ 07099	070-079, 085-089
	Military Center NY 090	090-098, 340
	ADC JAF NY 10180	100-102, 104
	ADC Westchester NY 105	004, 105-109
	ADC Queens NY 110	103, 110-114, 116
	ADC Long Island NY 117	005, 115, 117-119

Periodicals Transportation Hub Network

NOTE: Hubs are for transfer of direct ADC containers and pallets only.

Transportation Hub	ADC Facility	ZIP Codes Served
Greensboro BMC	ADC Roanoke VA 240	240-243, 245
Greenspord divic	ADC Greensboro NC 270	270-279, 285
	ADC Charlotte NC 280	280-284, 286-289, 297
	ADC Columbia SC 290	290-296
	ADC Columbia SC 290	290-290
Jacksonville BMC *	ADC Jacksonville FL 320	299, 304, 313-315, 320-324, 326, 344
	,	rnal USPS origin ZIPs 010-269)
*1	 ADC Jacksonville FL 320 ** (For internal USPS origin ZIF 	008, 299, 304, 313-315, 320-324, 326, 344
	ADC Mid-Florida FL 327	327-329, 334, 347, 349
	ADC Miami FL 331	330-333
	ADC Manasota FL 342	335-339, 341, 342, 346
	ADO Manasota FL 342	333-339, 341, 342, 340
Kansas City BMC	ADC Kansas City MO 64240	640, 641, 644-658, 660-662, 664-668
	ADC Wichita KS 64270	669-679, 739
Los Angeles BMC	ADC Los Angeles CA 900	900, 901
.	ADC Twin Valley CA 90197	902-908, 910-918
	ADC Sequoia CA 90198	922-928, 930-935
	ADC San Diego CA 920	919-921
	5	
Memphis BMC	ADC Nashville TN 370	307, 370-374, 376-379, 384, 385
	ADC Memphis TN 380	375, 380-383, 386-389, 723
	ADC Jackson MS 390	369, 390-393, 397
	ADC New Orleans LA 700	325, 365, 366, 394-396, 700, 701, 703-708
,	ADC Little Rock AR 720	716-722, 724-729
Mpls./St. Paul BMC	ADC St Paul MN 55222	540, 546-548, 550, 551, 556-559
p.0	ADC Minneapolis MN 55228	553-555, 560-564, 566
	ADC Fargo ND 580	565, 567, 580-588
	7.00 . a.g	
North Houston PDC	ADC North Houston TX 773	770-778
North Texas PDC	ADC Shreveport LA 710	710-714
	ADC Oklahoma City OK 730	730, 731, 734-738, 748
	ADC Tulsa OK 740	740, 741, 743-747, 749
	ADC North Texas TX 750	750-759
	ADC Ft. Worth TX 760	760-769, 790-797
	ADC San Antonio TX 780	733, 779-789, 798, 799, 885
Philadelphia BMC	ADC South Jersey NJ 080	080-084
i illiadelpina Divio	ADC South Jersey NJ 000 ADC Harrisburg PA 170	169-178
	ADC Lehigh Valley PA 180	180-188
	, and contiguity in A 100	.55 100

Periodicals Transportation Hub Network

NOTE: Hubs are for transfer of direct ADC containers and pallets only.

Transportation Hub	ADC Facility	ZIP Codes Served
<u> </u>	ADC Southeastern PA 189	179, 189, 193-196
	ADC Philadelphia PA 190	190-192
	ADC Wilmington DE 197	197-199
Pittsburgh BMC	ADC Pittsburgh PA 150	150-168, 260
1 Managh Divio	ADC Charleston WV 250	246-253, 255-259
*	ADC Clarksburg WV 263	261-266, 268
	(for mailer use only internal L	
	•	,
Salt Lake City ASF	ADC Boise ID 836	832-834, 836, 837, 979
	ADC Salt Lake City UT 840	840-847, 893, 898
	ADC Las Vegas NV 890	864, 889-891, 894, 895, 897, 961
San Francisco BMC	ADC Oakland CA 945	936-960, 969
_	ADC Honolulu HI 967	967-968
	AMF San Francisco CA 962	962-966
Seattle BMC	ADC Portland OR 970	970-978, 986
CORRIG DIVIO	ADC Fortiand ON 970 ADC Seattle WA 980	835, 838, 980-985, 988-994, 998, 999
	ADC Seattle VVA 500 ADC Anchorage AK 995	995-997
	· ·	
Springfield MA PDC	ADC Springfield MA 010	010-017
	ADC Boston MA 021	018, 019, 021, 022, 055
	ADC Providence RI 028	020, 023-029
	ADC Manchester NH 030	030-034, 038, 039
	ADC Portland ME 040	040-049
•	ADC White River Jct. VT 050	035-037, 050-054, 056-059
	ADC Southern CT 064	060-069
	ADC Albany NY 120	120-129
St Louis BMC	ADC St. Louis MO 630	620, 622-631, 633-639
Washington DC BMC	ADC Washington DC 200	200, 202-205
-	ADC Southern MD 206	206-209
	ADC Baltimore MD 210	210-212, 214-219, 254, 267
	ADC Northern VA 220	201, 220-223, 226, 227
	ADC Richmond VA 230	224, 225, 228-239, 244

ABP/USPS-7

On pp. 8-9 of USPS-LR-H-111, the claim is made that, based on past cases, "non-destination SCF Zone 1 and 2 Periodicals will always incur one transfer through a non-destination SCF or ADC/SCF before it is dispatched to its destination SCF."

- [a] Do current data support the claim?
- [b] How many ADC facilities are SDC facilities, and have the functions of SDC facilities changed since March 1995? If so, describe those changes.
- [c] Have ADC facilities replaced SDC facilities, and if they have, how has this change affected mail flow models of Periodicals as presented in the testimonies of Witnesses Moden, Seckar, Bradley, Taufique, cost assumptions presented in USPS-LR-H-111, the mail characteristics study, USPS-LR-H-190, and other USPS library references and exhibits used to support dropship savings for periodicals?
- [d] Please estimate by periodical zone how many transfer hub cross-dockings occur for zones used by a periodical other than zones 1 and 2. (USPS-LR-H-111, p.7). Provide all studies and analyses that support cross-docking estimates applying to zones 3-8, the persons making those estimates or performing such studies, and the time period for which these estimates were made.

RESPONSE:

- a. There currently are no data available regarding how a certain piece of Periodicals mail will travel through the transportation network form origin to destination. However, based on current operating procedures, it is likely that zone 1 and 2 Periodicals that are not entered at the destination SCF or DDU will incur at least one transfer through an intermediate facility before arriving at the destination SCF.
- b. The Postal Service no longer has an SDC network, so there are no SDCs.
- c. ADC facilities have replaced SDC facilities. However, the number of ADCs and SDCs were not identical as shown by Mr. Pajunas in Docket MC95-1 in Exhibit USPS-T-2A. As mentioned in the response to ABP/USPS-6(c), the functions of the ADCs have changed as a result of receiving the workload that used to be performed in SDC facilities prior to the implementation of Classification Reform. Mr. Moden's testimony in this docket does not reference the elimination of the SDC network. Because mail characteristics data collected prior to classification reform were used in the development of Periodicals mailflows, the

change from SDCs to ADCs had no impact upon the results presented by witnesses Bradley,
Taufique, or Seckar

d. As stated in the response to part (a) of this question, data regarding how a certain piece of Periodicals mail will travel through the transportation network from origin to destination are not available. Therefore, the number of cross-docks that Periodicals in a particular zone will receive is not known. There are no studies or analyses that estimate the number of crossdocks applying to Periodicals in zones 3-8.

ABP/USPS-8

Can the number of cross-dockings vary between two periodicals originating in the same postal zone that cross the same number of postal zones? If the answer is affirmative, explain why the number of cross-dockings may vary, although the zones traveled are the same. If the question is answered in the negative, please explain why cross dockings always correlate with zones used

RESPONSE:

Yes. As stated in the response to ABP/USPS-7, we do not know the specific routings a mailpiece may take through the network. It is possible that two periodicals in the same postal zone may follow a different route through the network and therefore receive a different number of cross dockings

ABP/USPS-9

Why are the weighted average costs incurred both for regular and for nonprofit periodicals (p.7 of USPS-LR-H-111) approximately .5 cents per pound less for a SCF cross-docking than for a BMC cross-docking?

RESPONSE:

The weighted average costs incurred both for regular and for nonprofit periodicals (p. 7 of USPS-LR-H-111) is approximately 0.5 cents per pound **more** for an SCF cross-docking than for a BMC cross-docking. The operations performed at an SCF are different from the operations performed at a BMC as can be seen in USPS-LR-H-111 (Appendix F, Tables 1 and 2 for regular rate and Appendix G, Tables 1 and 2 for nonprofit). Since the operations being performed at the two types of facilities are different, the costs are also different. In witness Byrne's testimony in Docket No. MC95-1 (USPS-T-11, page 43), the weighted average costs incurred for regular periodicals was .43 cents per pound more for an SCF cross-docking than for a BMC cross-docking.

ABP/USPS-10

Define "BMC realization factor." (USPS-LR-H-111, p 8).

RESPONSE:

The "BMC realization factor" is a measure of efficiency that was originally calculated by witness Byrne (R84-1, USPS-T-14). The "realization" measurement of efficiency at a BMC is calculated as the total direct labor hours "earned" for all mail processing operations divided by total direct labor hours "clocked" for the same operations over the same time period. The "earned hours" figures used in the calculation of a BMC realization are the hours that a BMC's individual foreman area, or workcenter within that foreman area, "earns" or "is credited with," based on the volume processed in a given time period (tour, day, week, accounting period, etc.) and a "guideline" productivity for processing a unit of that volume, expressed in terms of "units per work hour". Thus, if a particular BMC workcenter operates under a guideline productivity of 30 units of volume per work hour and processes 1,000 units during a certain period, that workcenter "earns" or is credited with 1,000/30 or 33.3 work hours. If the actual number of hours required in that workcenter to process the 1,000 units were only 31 work hours (i.e., it processed these units at a rate of 1,000/31, or 32.26 units per hour), the workcenter's performance is estimated as earned/actual, or 33.3/31, or 1 0742 (107.42%). If that same workcenter were also charged with 1.0 hours of nonproductive time (e.g., for standby, union business, medical unit, or miscellaneous other nonproductive activity) during that same period, the workcenter would be charged with this additional 1 0 "clocked" hour, for a total of 32 clocked hours (31 actual productive plus 1 nonproductive). The "realization" percentage for the workcenter (as opposed to its "performance" percentage) is calculated as earned/clocked, or 33.3/32, or 104.06 percent.

ABP/USPS-11

Confirm that, if the productivities listed in Appendices F and G of USPS-LR-H-111 had changed since 1984, the cost/piece and cost/pound data for SCF and DDU entry periodicals shown in Appendix F, Tables (SCF Rate Periodicals Mail Regular) and Appendix G, Table 3 (SCF Rate Nonprofit Periodicals Mail) would also have changed.

RESPONSE:

Confirmed.

ABP/USPS-12

Appendices F and G of USPS-LR-H-111 both contain data inputs (among others) like those shown in Section 4.0, "Other Inputs":

- 11.13% proportion of SCFs that are mechanized
- 88.87% proportion of SCFs that are not mechanized
- 49,09% proportion of mail in sacks
- 50.91% proportion of mail on pallets
- [a] Are the above percentages accurate in the current mail processing and operating environment described by Witness Moden (USPS-T-4) and
- [b] Will the above percentages be accurate for the test year beginning October 1, 1997? Please explain fully a positive or negative response to either or both parts of the interrogatory, and provide updated percentages for each category if the percentages cited from Section 4.0 above are out-of-date.

RESPONSE:

- a. Yes. The percentage of sack versus palletized mail was obtained from a recently performed mail characteristics study for Periodicals mail (USPS LR-H-190).
- b The estimates listed above represent the most current data available.

ABP/USPS-13

According to the response to UPS/USPS-T15-7, "All shapes of mail primarily within the Standard and Periodicals classes are affected by IMHS (Integrated Mail Handling System)." What cost components of the MODS System employed by USPS in this case to identify mail processing costs will be affected by IMHS in the test year, and will this effect result in fewer sacks, or greater platform, opening, and pouching productivities for periodicals than would otherwise be true?

RESPONSE:

The mail processing cost components that are primarily affected are the BMC platform and the MODS platform. Productivity is anticipated to increase in platform operations for Standard and Periodicals mail due to the handling of containerized loads and palletized mail as opposed to sacks, parcels, and trays.

ABP/USPS-14

Christensen Associates is identified as the author of the "Second-Class Mail Characteristics Study," USPS-LR-H-190, which is used by Witness Taufique to estimate volumes for various periodical rate elements. Please identify any employee of Christensen Associates who is a USPS witness in this case and was the author, co-author, or a participant in the preparation and compilation of the study. If the author or author(s) of the study are not USPS witnesses, to which USPS witness should discovery about the study be addressed?

RESPONSE:

As indicated in USPS LR-H-190, the Second Class Mail Characteristics Study was prepared by Christensen Associates under the direction of the Office of Product Finance within the Postal Service. Questions regarding the study may in the first instance be directed to the Postal Service.

ABP/USPS-15

Postal Bulletin 21951 (7-31-97) states on p 9 that effective immediately, the Postal Operations Manual is changed to reflect changes in platform operations. The changes appear on pp. 75-92.

- [a] Please provide the parties with copies of these pages as a library reference.
- [b] Identify and explain major changes in platform operations that these revisions have made.

 RESPONSE:
- a. Copies of the prior edition of the Postal Operations Manual, as well as new pages, are attached.
- b. Issue 7 of the Postal Operations Manual (POM) (filed in Docket No. MC96-3 as USPS LR-SSR-161), effective August 1, 1996, did not include provisions relating to platform operations, which had been published in the previous edition of the POM. The attached pages, which are printed in Postal Bulletin 21951 (7/31/97), restore and update the former POM provisions (which are also attached). Revisions to the POM provisions were made to conform to existing practices, such as by elimination of provisions relating to the use of placards on trailers (see former POM § 421.3), and inclusion of provisions relating to the use of computers for data entry (see, e.g., revised POM § 472(c)).

420 Mail Processing Procedures

421 Platform Operations

421.1 General 🥳

.11 Objectives. Each postal facility must organize platform operations to provide unloading, loading, and dock transfer to meet service requirements and to eliminate delays caused by careless platform handling. The mishandling of one pouch, sack or container on the dock negates the value of sophisticated distribution procedures and could cause delay to thousands of individual pieces of mail.

.12 Transportation Schedules...

- .121 Overall: Responsibility. Transportation Management Offices (TMOst) prepare and distribute of schedules of all modes of transportation affecting postal installations in an assigned agent 202.
- .122 Postal Vehicle Service (PVS). The local office prepares schedules of PVS trips and intra-city contract transportation when instructed to do so by the TMO.
- .123 Posting Schedules. Each SCF (and individual post offices acclesignated by the TMO) must prepare and maintain a correct and integrated list of arrivals and departures in time sequence. This fist must
- a. Clearly identify the transportation (highway contract route and trip number, PVS and trip number, etc.)
- b. Be posted in the platform area for the information of all concerned.
- .124 Maintaining Files. Each SCF must maintain a current file of the individual schedules of those routes serving the facility.
- .125 Schedule Changes. It is the responsibility of the SCF postmaster to request changes in transportation to meet service requirements. Note:
- a. An SCF which is not a management sectional center (MSC) sends such requests through its MSC.
- b. An MSC directs requests in writing to its TMO and sends a copy to its District Manager.
- .126 Schedule Errors. All offices must promptly report to the CMO any errors in transportation schedules, including the master air and surface schedules.

.13 Visual Aids on the Platform (Dock)

- .131 Inbound Trips. For each inbound trip, receiving offices must prepare visual aids showing the separations (or other unique features) expected on the trip and the content of the separations. Note: This instruction is not applicable to BMCs or offices with mechanized unloading to machine distribution.
- .132 Outbound Trips. For each outbound trip, dispatching offices must prepare visual aids showing the individual and/or inclusive ZIP Codes to be dispatched and other unique features.

421.2 Sealing Program and Procedures

- .21 General Requirement. All dispatching offices under the Highway Contract Seal Program must seal each outhound highway contract vehicle, rail van (piggyback trailer), or rail ear with numbered tin hand seals and twisted wire seals and complete Form 5398-A. Contract Route Vehicle Record. Dispatching and receiving offices must have twisted wire sealing and cutting equipment.
- .22 Exemptions and Exceptions. In some cases, the seal system is not used at all or is used with minor deviations, as follows:
- a. Unmanned Offices. The seal system is not used for dispatches of mail to offices where vestibule exchange is involved or where postal personnel are not normally on duty to accept delivery. Form 5398-A is annotated Seal Not Required to verify load was in good condition and who closed it.
 - b. Empty trailers, vans, or rail cars are not sealed.
- c. Contract Vehicles. Small highway contract routes utilizing equipment with automobile type locks which are not scalable are exempt from the scaling requirements. Contract vehicles secured with contractors padlocks are exempt from using twisted wire scals, but must use the numbered tin band scal.

NOTE: Twisted wire seals are never used alone. They are always used in conjunction with numbered in band seals.

- d. Foreign Mail. The seal system does not apply and is not utilized for foreign mail containers.
- e. Outbound Military Mail. All outbound military mail containers dispatched overseas via surface transportation are sealed with both twisted wire seals and numbered tin band seals. Form 5398-A is not used in conjunction with the sealing of these containers
- f. Inbound Military Mail. Inbound military mail containers are sealed only with the numbered (in band seals (i.e., (wisted wire seals are not used)).
- .23 Disseminating Instructions. Dispatching offices must furnish necessary instructions to offices which receive sealed vans and are not familiar with the seal program. The instructions must include procedures for removing, verifying, and filing numbered seals and forms.
- 24 Necessary Supplies. The sealing program uses the following basic supplies:
 - a. Item 0-817-A, Numbered Tin Band Seal
 - b. Form 5398-A. Contract Route Vehicle Record
 - c. Security seal imprinter
- d. Twisted wire seal (12" section of 8-gauge steel wire hand)
- e. Twisted wire sealing and cutting equipment (see 421.27).
- .25 Security of Numbered Seals. At each facility where numbered tin hand seals are used, a supervisor and a clerk are designated as seal control officer and alternate seal control officer, respectively. The reserve stock of seals is under the exclusive control of the seal control officer and his alternate. Note:

- Seads are issued in units of 100 or in units of a two-day supply—whichever is less.
- b. Seals must not be given to contract employees under any circumstances.
- .26 Multi-Doored Vehicles. Special requirements for multi-doored vehicles depend on whether or not the side doors are used on route.
- a. Unused Side Doors. Side doors of highway contract vehicles which are never used must be permanently scaled by applying a twisted wire scal and a special (bright orange) scal to the unused doors. The special scal is not recorded on Form 5398-A. When scaling or removing the regular numbered scal from the rear doors of the vehicle, make a visual check to see that both the special scal and the twisted wire scal are intact. However, it is not necessary to verify the number of the special scal.
- b. Used Side Doors. Multi-doored vehicles having side doors that are used en route require numbered scals on both doors. Use one Form 5398-A for the side door and another for the rear door. When unloading mail, remove only the scal on the door being opened and verify the scal number on the other door.

.27 Twisted Wire Seals

- .271 Applying Wire Seals. Ewisted wire seals require approximately 90 seconds to affix and are fastened as follows:
- a. Insert a 12-inch section of 8 gauge steel wire rod halfway through the hasp of the door to be sealed.
- b. Bend the wire rod double and insert one end into a special twisting tool.
- c. Rotate the tool to catch the other end of the wire, thus twisting the wire into a tight knot which can be removed only with the use of a boil cutter.
- d. Twist the sent against the door hasp so that it cannot be untwisted with a screwdriver or a pair of pliers.
- .272 Removing Wire Seals. Cut the seals with at least a 14-inch bott cutter. For personal safety, make the cut close to the hasp.

.28 Form 5398-A

- .281 Applicability. Form 5398-A must be completed by all facilities (including BMCs) for each highway contract route vehicles rail van (piggyback trailer), and rail car which hig to be sealed. See 421.22e for exception.
- .282 Automatic Imprinting. A security seal imprinter is used to automatically record the date, name, and ZIP Code of the dispatching facility and the serial number(s) of the fin hand seals on the Form(s) 5398-X. The imprinter can accommodate three fin hand seals.
- .283 Dispatching Entries. The dispatching employee must write certain entries on the Form 5398-A. These include:
- a. Name of employee sealing sehicle at point of origin.

- b. Destination. Show the facility to be served next by the vehicle. (This may be an intermediate stop en route.)
- c. Driver's name. Note, however, it is not necessary to show the driver's name when sealing a :
 - (1) piggyback trailer, or
- (2) the first trailer of a double trailer trip. See also 421,292.
- d. Departure Time and Date. Note, however, when sealing piggyback trailers in advance, write the sealing time and date rather than the departure time and date.
- e. Registered mail is not identified or recorded on Form 5398-A.
- .284 Defective Seals. When sealing vehicle doors, dispatching employees who discover defective seals should submit them to their supervisors within the numerical sequence of those seals listed on Form 5398-A.
- .285 Distribution. Form 5398-A is a three-part form; two soft (tissue) copies and a hard (tindex) copy. Copies are distributed and used as follows:
 - a. First soft copy. Retain at dispatching facility.
- b. Second soft copy. Give to vehicle driver for use
- (1) as a gate pass at facilities where access is controlled by security force personnel, and (1)
- (2) as a bill of lading at truck weigh stations or at en route inspections by regulatory agencies.
- c. Hard (index) copy. Place in open ended envelope attached to the inside wall of the vehicle's cargo compartment. Do this immediately prior to the closing and sealing of the cargo doors.
- .286 Receiving Entries. Any employee who breaks the seal at the point of destination must process the Form 5398-A as follows:
 - a. Enter name of employee breaking seal.
 - Identify any discrepancies (see 421.29).
 - c. Submit forms and seals for retention.
- .287 Retention. Forms 5398-A and related numbered seals must be filed for 15 days at the receiving facility.

.29 Sealing Discrepancies

- .291 General Rule. Any employee who notices a sealing irregularity (e.g., a discrepancy in a seal number of a broken or missing seal) must initial the related Form 5398-A and notify his supervisor. The supervisor:
- a. Verifies the irregularity and also initials the Form 5398-A.
- b. Immediately reports the irregularity by telephone both to the dispatching facility and to the appropriate Postal Inspector in Charge; and confirms the telephone report with a written report.
- c. Retains the seal and related form until the investigating postal inspector authorizes its release.
- 292 Special Cases. For a discrepancy involving either a double trailer or a relay driver (a driver other than the one who drove the first segment of the route), the employee discovering the discrepancy must

determine the name of the driver and enter it on the Form 5398-A

421.3 Use of Placards

- ,31 Requirement. Dispatching facilities must put placticds on all rail and highway vans except on intrasectional center routes.
- 32 Description. The information on the placards describes the contents for destinating facilities in a format that can be used with the Van Control System. There are three different colored placards:

Placard Form No.	Placard Color	Placard Used on
K-1112	Blue	Trailers moving from origin to destination by rail-only, or by combination of rail and highway.
51112 - •	()range	frailers loaded at a mailers plant moving by rail or high- way, or both, between the mailers plant and destination.
5111-E	Green	Frailers moving from origin to destination by highway only.

.33 Preparation

,331 General. Rubber stamp information on the placards or hand print it in large letters. Do not use typewritten print on placards:

.332 Contents

a. Enter the trailer type code in the contents space on the placard. Trailer loads or van loads are designated by type according to the load content and position within the unit. Each mail type is loaded in segments that approximate 7 ft. high by 3 ft. thick by 8 ft. wide. Trailer types or van types are identified by letter in accordance with the following:

Type Des	cription of Contents .	
Inter-BMC Highway and Rail		
M Mixed parcels sacks and NMO: B Parcels Treferential mail pouches, sacks parcels.	N NMOs P Pallets S Sacks-Bedloaded D Empty Vans R Empty Sacks	
Intra-BMC Hig	hway Routes	
C Containers H Hampers M Sacks, containers, and NMOs N NMOs P Pallets S Sacks-Bedloaded	1 No load 2 Empty containers 3 Empty hampers 4 Empty sacks 5 Empty pallets 6 Mixed empty equipment	
Inter-SCF Highway		
F Preferential mail - pouche	s, sacks, parcels, etc.	

b. Use information from Form 5041, Storage Car and Van Check Sheet, to complete the contents portion of the placard.

.333 Tail End

a. Complete the tail end space on the placard to show mail type loaded on the tailgate of the van. The following codes are used to indicate the load on the tailgate:

Туре	Description of Contents
В	Parcels
F	Preferential mail - pouches, sacks, parcels, etc.
N	NMOs (nonmachinable outside parcels)
P	Pallets
5	Sacks

b. If it is necessary to load more than one multype on the tailgate of the truck or trailer, draw a diagonal line across the tail end block on the placard and insert the appropriate additional letter to describe the mail loaded.

.34 Removal. Receiving facilities must:

a. Remove placards from all vans unloaded, and

b. Retain placards from vans in which irregularities are found until the investigating postal inspector authorizes their release.

421.4 Mail Arrivals

.41 Recording Arrivals. All mail arrivals (whether via scheduled transportation or extra trips) must be recorded on the appropriate form. Complete the forms as required; include additional remarks to explain deviations. Appropriate forms are:

Source of Mail	Record Trip Arrivals on
Main Office Collection Runs at CAG A-G Offices	Form 3%8, Daily Mail Collection Record
Stations and Branches via PVS	Locally-designed form
Stations and Branches via Highway Contract Route	Form 5398, Transportation Performance Record
Associate Offices via Highway Contract Route	Form 5398, Transportation Performance Record
Other SCFs via Highway Contract Route	Form 5398, Transportation Performance Record
AMF or Aurport	Locally-designed form or as required by TMO
Bulk Mail Center via Highway Contract Route	Form 4458, Vehicle Inventory-(Inbound)
Local Private Mailers	Locally-designed form, if warranted
Private Mailers from Other than Local Area	Locally-designed form, if warranted

.42 Unloading 🚉 🛫

.421 Instructions. All receiving facilities must prepare detailed unloading instructions for each platform operation. The detail necessary depends on the size and complexity of the office. Always include instructions pertaining to the unloading of mail which must pass through acceptance procedures before processing. In some cases it is necessary to identify belts and slides by number with visual aids, because this helps employees place specific mail items on specific belts. Example.

6.5 T. 14	Date Marabas	
Mail Item	Belt Number	
Pouches	103	
Coffection Mail to be		
Canceled	101	
Sacks of City Newspapers	102	

- .422 Form 5201, Mail Van Inspection Report. The purpose of Form 5201 is to show the condition of trailers when received for loading, storage, or reloading. Follow instructions issued by the TMO to complete Form 5201.
- .423 Form 4458 and 5398. Receiving offices must record the arrival time and the unloading time for all trips (including extra highway route trips):
- BMCs use Form 4458 to record times. All other offices use Form 5398.
- b. Although most offices maintain Forms 4458 and 5398 at the platform, BMCs and certain large post offices may find it advantageous to maintain the forms at some other place.
- .424 Removing Seals. The designated platform employees at an unloading point must:
- a. Remove all numbered seals and twisted wire seals (see 421.272)
 - b. Complete Form 5398-A (see 421.286).
 - Identify any discrepancies (see 421.29).

.425 Removing Placards. See 421.34

.43 From Air Facilities.

- .431 Responsible Employees. All employees who are responsible for the dispatch and receipt of mail at airport mail declines (AMFs) or local airstop points, must be thoroughly familiar with the air contract data collection system and required forms contained in PO-507. Air. Contracting Administrative Procedures
- .432 Air Taxis. Use appropriate forms See Publication 171. Transportation of Mail by Air Taxi Operators.

.44 Platform Transfers

- .441 Preferential Mail. Preferential mail must be given expeditious handling on platforms.
- 442 Transfer Failures. If a transfer failure is caused by poor supervisory judgment, local management must take immediate corrective action. If the transfer failure results from the late operation of a

highway contract and is not caused by legitimate reasons

- a. SCFs, administrative offices, and large installations other than post offices complete Form 5500, Report of Contract Route Irregularity.
- b. Other offices report irregularities to the appropriate administrative official of the contract involved using USPS routing slip, Item 0-13.
- .443 Missent Mail. Use Form 1617, Missent Mail Notice, to notify responsible post offices and BMCs of receipt of missent pouches, sacks, containers, and outside pieces of all classes of mails.

421.5 Mail Departure

- .51 Recording. All mail departures (whether by scheduled or extra trips) must be recorded on the appropriate form. Complete the forms as required. Appropriate forms are:

Mail Destination	Record Trip Departures	
Inter-SCF via Highway Contract Route Associate Office via Highway Contract Route Intra-SCF via Highway Contract Route	Form 5398. Transportation = Performance Record	
Non-local via AMF or Airport Stations and Branches	Lucally designed form for PVS or Form 5398 for High- way Contract Service	
Bulk Mail Center via Highway Contract Route	Form 4459, Vehicle Inventory (Outbound)	
Bulk Mail Center via Rail	Form 4459 and other forms as instructed by TMO	

.52 Loading

- .521 Instructions. Detailed loading instructions must be prepared for each platform operation. Load trucks and trailers in accordance with prescribed regulations and/or special contract provisions.
- .522 Diagrams. Highway contract route trucks and trailers must be loaded according to diagrams on file and special instructions issued by the Regional Postmaster General or TMO. Special emphasis must be placed on the handling of preferential mail to be certain it is loaded for prompt handling at intermediate stops and at destination.

.523 Form 5201. See 421.422.

- .524 Attaching Seals. The designated platform employees at a loading point must:
- a. Identify vehicles which must be sealed (see 421.21).
- Apply numbered (in band and twisted wire seals (see 421.27).
 - a Complete Form 5398-A (see 421.28).
- .525 Attaching Placards. Dispatching facilities must:
- a. Identify vehicles which require placards (see 421.31).

b. Prepare placards as specified in 421.33.

.53 Scheduling Extra Trips

- .531 PVS. Trips. Estra PVS trips are costly and should not be scheduled unless necessary to prevent delay to mail.
- .532 Highway Contract Route Trips. No office may request or schedule extra highway contract route trips unless warranted to prevent serious delay to preferential mail or unless justified because of mail volume. Note:
- a. Each extra highway contract route trip certified for payment must be supported by a Form 5397. Contract Route Extra Trip Authorization.
- b. A copy of Form 5397 will be retained in the office which issues Form 5429. Certification of Exceptional Contract Service Performed.
- c. Postmasters are furnished advance notice, when possible, of additional trips via Form 5397.
 - .54 To Air Facilities. See 421.43.

421.6 Staging for Scheduled Delivery

- .61 Provisions, Mailers of non-preferential, second- and third-class mail may request specific delivery dates for their mail—providing they furnish the mail to post offices in advance of the scheduled delivery date.
- .62 Identification. To identify scheduled delivery-date mail, mailers may use:
 - a. Their own tags, or
 - b. Tag 13.
- .63 Instructions By the Local Office. Platform employees should be issued appropriate instructions relative to the handling of scheduled delivery-date non-preferential mail.

421.7 Special Mailer Preparation

- .71 General Explanation. Mailers who prepare their mail in special ways do so:
 - a. To qualify for special presort rates, and/or
- b. To reduce handlings within the post office and thus expedite service.
- In either cases platform employees must recognize such mail and findle it in a manner which takes advantage of the mailer preparation. Some examples of specially-prepared mail are trayed mail. ZIP Code sequenced (riffe) mail, and containerized mail.

.72 Trayed Mail

- .721 Depending on the degree of makeup and the manner in which postage is paid, platform personnel must develop a system (with the approval of the Director of Mail Processing and the Director of Support) to make certain that trayed mail is afforded expeditious handling.
- .722 Platform supervisors should utilize any or all of the following tags or labels to assist in the correct routing of trayed mail:

Tag/Label	Used for
TAG 13	Scheduled Mail - For Processing on
TAG 23	First-Class Presorted - All for Firm on Label
TAG 24	First-Class Presorted - All for ZIP Code on Label
TAG 25	First-Class Presorted - All for First 3-Digits of ZIP Code on Label
TAG 57	Political Campaign Mailing
TAG 122	Carrier Presoned Mail
LABEL 204	First-Class Presorted - All for ZIP Code on Face
LABEL 205 '	First-Class Presorted - All for First 3-Digits
LABEL 206	First-Class Presorted - All for State on Face
LABEL 207	OCR Machine Readable

.73 ZIP Code Sequence (Riffle) Mail

- .731 Riffle mail consists of letters and flats that have been customer sequenced by ZIP Code, states or otherwise (outgoing or incoming schemes).
- .732 Platform personnel should familiarize themselves with the mail arriving at the dock to locate, identify, and correctly route riffle mail. A local method of identifying the sacks, trays, or containers of riffle mail must be established.
- .733 First-handling riffle mail should never be distributed on a letter sorting machine (LSM), an Optical Character Reader (OCR) or a single position letter sorting machine (SPLSM). Riffle mail should be manually sorted into cases or directly into trays or loose packs.

.74 Containerized Mail

.741 BMC Containers. Large volume mailers of parcel post should be encouraged to use BMC containers to eliminate a handling of individual parcels on a platform or in a parcel distribution operation. The use of these containers by a private mailer must be monitored to avoid misuse or lack of use of such equipment.

.742 Plastic Letter Trays. A mader of a large volume of first-class letter mail should be encouraged to use plastic letter trays and Labels 204, 205 and 206, in order to reduce handlings at post offices. Mailer use of plastic trays must be monitored by the local post office to prevent unauthorized use.

422 Mail Preparation Operations

422.1 Operational Description

.11 Scope

- .111 Mail preparation operations are supported and greatly affected by:
- a. The makeup and handling of incoming collection mail emanating from stations and branches, associate offices, collectors, and firms.
- b. The platform handling of such mail upon its arrival at the mail processing facility.
 - .112 The mail preparation operations encompass.
- a. The staging of mail for subsequent processing based on class of mail, mail type, and postage payment method.
- b. The culling, facing, and canceling of individual classes and types of mail at work stations.
- c. The staging of culled, faced, and canceled mail at mail preparation work stations for transport to applicable distribution and pouching operations.
- .12 Impact. Since the performance of the tasks described in 422,112 has significant effect on downstream operations, it is essential that each mail processing installation establish and maintain a carefully structured and well-managed mail preparation system. A well-run mail preparation operation is integral to the creation of a cost efficient, service effective, mail processing system and, therefore, should be considered a high priority management objective.

.13 Mail Preparation Systems

- .131 General. In-plant mail preparation configurations at mechanized mail processing facilities are generally either centralized or unitized. Configurations at non-mechanized mail processing facilities may be simillar to those at mechanized facilities.
 - .132 Centralized: Centralized systems typically:
- a. Employed or more culling belts manned by two to four cullers.
- b. Utilize ciffers for separating metered bundles, flats, and irregular parcels onto dedicated take-away belts for transport to the appropriate work station for that type of mail.
- c. Use a common surge conveyor from which loose letters can be separated to a series of Model 500 Edger Feeder/Mark II Facer-Canceler combinations.

.133 Unitized. Unitized systems typically:

- a. Employ a series of individual culling belts each manned by one culler, one dumper, and one Mark II operator per unit.
- h. Utilize designated hampers or utility carts into which bundled letters, flats and irregular parcels are

separated and subsequently transported to the appropriate work station for that type of mail.

- c. Carry loose letters directly to the Model 500-Mark II combination, which are in tandem with each culling belt.
- .134 Reference. For further information about mail preparation system configurations, see Publication 37, Postal Facilities Planning Data and Equipment Layouts.

422.2 Mail Preparation Work Stations

- .21 Definition, A mail preparation work station is a sub-operation where specific tasks are performed which facilitate the flow of mail to distribution or pouching operations. Mail preparation operations in medium and large size mechanized post offices are structured around a series of well-defined work stations. Each work station has primary responsibility for the handling and processing of a specific type and/ or category of mail. The physical configuration, equipment usage, and staffing levels applicable to a particufar type of work station (e.g., flats processing belt) may vary from installation to installation, depending upon differences in facility design, floor layoutg voltime, and mail mix. Small mechanized offices and nonmechanized offices may have mail preparation work stations which are similar to or combine the work stations of medium or large mechanized facilities.
- .22 Identification. The work stations listed below are common to most mechanized mult preparation operations. (Note: d. f. pertain to stamped letter mail processing.)
 - a. Staging area.
 - Dumping station.
 - Rough cull operation.
 - d. Edger-feeder/facer-canceler operation.
 - e. Reject mail processing,
 - f. By-pass stacker processing.
 - Metered mail.
 - h. Metered hundles.
 - i. Flats canceling.
- j. Cancellation and separation of regular and irregular parcels.
 - k. Handling of short-paid and damaged mail.

422.3 Optimum Mail Preparation Inputs

- .31 Explanation. Main office collectors, stations and branches, associate offices, and customers who deposit their mail directly into cooperative mailing racks should properly separate mail because separation:
- a. Facilitates the staging of mail upon its arrival at the processing facility.
- b. Expedites its flow through the various mail preparation work stations.

.32 Main Office Collectors

.321 Optimum Separation

- a. Melered bundles or mixed metered mail (where there are dedicated collection boxes for metered mail).
 - b. Obvious flats.
 - c. Mixed collection mail.



Revision Pages

This page intentionally left blank

47 Platform Operations

471 General

Each postal facility must organize its platform operations to provide unloading, loading, and dock transfer to meet service requirements and eliminate delays caused by careless platform handling. Platform operations should be organized to provide a safe and efficient environment. The mishandling of one pouch, tray, outside mail piece, sack, pallet, or container on the platform (dock) negates the value of sophisticated distribution plans and could cause thousands of individual pieces of mail to be delayed.

472 Contract Mail Handling Facilities

Contract mail handling facilities, such as those in the hub and spoke program (HASP), that dispatch or receive vehicles with mail, including mail transport equipment, must follow these requirements:

- a. Transportation schedules must be posted as specified by the Postal Service or as appropriate under the contract.
- b. Vehicles must be properly loaded and documented.
- c. Data input to postal computer systems must be performed as directed by the Postal Service (such data entry capabilities must be cleared through the postal contracting officer (CO) and computer application program manager). Contract employees designated to request access to a postal computer system must complete Form 1357, Request for Computer Access, as well as any other clearance documents specified by the postal application program manager and postal Inspection Service.
- d. If the facility dispatches or receives vehicles in the postal seal program, the facility manager or contract representative must identify a seal control officer and follow security requirements in 476.
- Timely sorting, distribution, loading, and dispatch to meet postal schedules.

473 Transportation Schedules

473.1 Overall Responsibility

Area Office Distribution Networks (DN) prepares and distributes schedules for all modes of transportation within an assigned area. Transportation schedules are available and provided in a computer based application, where possible.

473.2 Postal Vehicle Service (PVS)

The local Transportation and Networks office prepares schedules of PVS trips and, when instructed to do so by Area Office Distribution Networks, intra-city contract transportation.

473.3 Highway Contract Transportation

Area Office Distribution Networks (DN) develops contracts and distributes schedules for all Highway contract routes (HCRs).

473.4 Rail and Intermodal Contract Transportation

Rail and intermodal contracts are awarded by postal headquarters after development with Area Office Distribution Networks (DN). Area Office Distribution Networks distributes information and training for rail contracts and rail management information systems.

473.5 Posting Schedules

Each processing and distribution plant (and individual post offices as designated by Area Office Distribution Networks) must use and maintain a current, correct, and integrated list of arrivals and departures in time sequence. This list must be in electronic or hard copy format and must:

- a. Clearly identify the transportation plans (highway contract route and trip number, PVS and trip number, drop shipment appointment, etc.).
- b. If hard copy, be posted in the platform area. (This includes posting at post office stations and branches and intermediate stops on the route of travel.)
- Be updated as necessary to reflect current schedules.

473.6 Maintaining Files

Each processing and distribution plant and post office must maintain a current file of the individual schedules of those routes serving the facility. The file must be in electronic or hard copy form. Documents that require retention, such as Form 5397, Contract Route - Extra Trip Authorization, Form 5500, Report of Contract Route Irregularity, and Form 5398-A, Contract Route Vehicle Record, must be retained as specified in the Administrative Support Manual, and Handbook PO-513, Mail Transportation Procurement Handbook.

473.7 Schedule Changes

It is the responsibility of the processing and distribution plant manager and post office postmaster to request changes in transportation to meet service requirements as follows:

- a. A post office that is not a processing and distribution plant sends such requests through its local transportation and networks manager, who reviews, coordinates, and forwards requests in writing to the Area Office Distribution Networks.
- b. A processing and distribution plant directs requests in writing to its Area Office Distribution Networks and sends a copy to its plant manager.

c. Box delivery requests are sent through the local District Postal Operations Manager (DPOM), who reviews, coordinates, and forwards requests in writing to the Area Office Distribution Networks. Area Office Distribution Networks reviews schedule change requests, coordinates with other local, Area, and headquarters offices as necessary, and considers service and budget impacts prior to approval.

473.8 Schedule Errors

All offices must report any errors in transportation schedules promptly to their Area Office Distribution Networks. This includes errors in any printed report or electronic program, such as the Highway Contract Support System (HCSS), Transportation Information Management and Evaluation System (TIMES), yard control or vehicle information system, National Air and Surface System (NASS), and any change in air and surface schedules. Plants must notify their Area Office Distribution Networks of all changes in or corrections of postal vehicle service (PVS) schedules.

473.9 Extra Trips

All offices must record in the appropriate computer system, such as TIMES, extra trips dispatched or received. In addition, offices must complete required postal forms. For example, for highway contract service, complete Form 5397, Contract Route - Extra Trip Authorization. For rail dispatches, complete Form 5186, Routing Instructions for Mail Movement, either from the Rail Management Information System or the manual version.

474 Loading

474.1 Instructions

Managers responsible for transportation must produce detailed loading instructions for each platform operation. Platform personnel must load trucks and trailers in accordance with prepared instructions, prescribed regulations, and/or special contract provisions.

474.2 Diagrams

Highway contract route (HCR) trucks and trailers must be loaded according to diagrams on file and special instructions issued by Area Office Distribution Networks. Preferential mail must be placed in the vehicle so that it can be readily identified and unloaded at intermediate stops and at final destination.

474.3 Managing the Vehicle Load

The purpose of proper loading is to ensure safe and damage-free transport of the load. Drivers who transport overloaded vehicles are susceptible to accidents, and may be ticketed and have substantial points assessed against their license. In some cases the Postal Service may make a court appearance regarding the citation. Other cases may require communication with the state Department of Motor Vehicles. In both instances, the overloaded vehicle causes an unnecessary and unproductive use of resources. Drivers who load their own vehicles to an

overloaded condition are responsible and may be liable for any fine. Platform managers, supervisors, and employees must ensure that vehicles are loaded in a safe and legal manner.

- For trips with special loading plans, loading diagrams should be posted at dock doors.
- b. In each vehicle fitted with side wall ("E") tracks, the load is secured with shoring straps and/or load bars.
- c. Whenever containers with drop-down pins are loaded in a vehicle with floor pin stake pockets, each container's pin is fitted in a floor pocket and container brake applied.
- d. Pallets are arranged in a pinwheel fashion, where pallets are loaded side by side in the vehicle with the long (48-inch) side of one next to the short (40-inch) side of the other, and the next row is loaded in the opposite direction. This interlocks the pallets and helps prevent them from sliding and the load shifting. See Exhibit 474.3 for an example of pinwheeling pallets.
- e. Bedloaded sacks are brick-laid stacked in an orderly manner with the string side of the sack facing forward.
- f. Bedloaded trays are stacked with heaviest trays on the bottom and each successive level placed in a crisscross manner.
- g. Bedloaded parcels and nonmachineable outsides are brick-laid stacked in an orderly manner with heaviest parcels and outsides on the bottom.
- h. Mixed loads are arranged with bedloaded trays stacked along the side walls and sacks loaded in the middle across the vehicle.
- i. Vehicles are not to be loaded with more weight than the vehicle's specifications provide or law permits.
- j. Additional cargo restraint methods are used for potentially unstable loads.

474.4 Cost for Overweight Vehicles

If a Postal Service facility overloads a Highway Contract Route (HCR) vehicle resulting in a fine to the contractor, the contracting officer for that HCR may use his or her discretion and reimburse the contractor for the cost of the fine and charge that cost to the facility that overloaded the vehicle. If a contractor overloads their own vehicle resulting in a fine to the contractor, the contracting officer for that HCR may hold the contractor responsible for the fine or in special circumstances may use his or her discretion and reimburse the contractor for the cost of the fine. In some cases a law enforcement official requires excess weight be taken off the vehicle before continuing on its journey. This situation delays the mail and adds additional cost for the extra vehicle and driver. If possible, the office that loaded the vehicle provides the means to remove, transfer, and transport the excess load. If not possible, the nearest able plant or post office provides the resources and notifies the origin office of the incident.

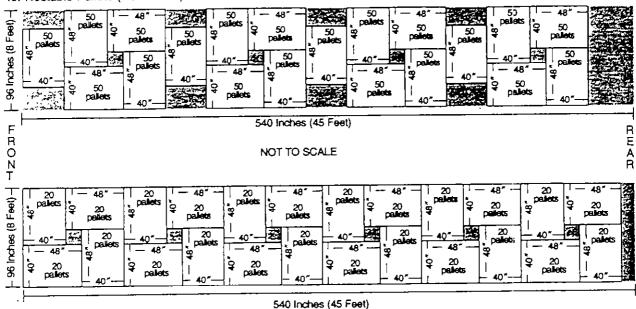
474.5 Attaching Seals

The designated platform employees at a loading point must:

a. Identify vehicles that must be sealed (see 476.1).

Exhibit 474.3
Safely Loading Pallets into Trailers

Required Floor Loading Plan for Nestable Pallets (PSIN 3919)



Required Floor Loading Plan for Wood Pallets (PSIN 3919)

- 340 II ICI IOS (40 1 00)
- b. Complete Form 5398-A and insert appropriate copy into vehicle (see 476.8).
- c. Apply numbered tin band and twisted wire seals (see 476.7).

475 Visual Aids on the Platform (Dock)

475.1 General

Visual aids provide platform employees easy and efficient access to information concerning the proper loading and dispatch of trips, as well as information about arriving trips. Visual aids enhance platform operations by providing ready information so employees can expedite unloading and transfer of mail to inplant operations, and can expedite the proper loading, sequencing, and dispatch of outbound mail. Platform supervisors should ensure accurate visual aids are displayed in an appropriate place on the platform.

475.2 Inbound Trips

475.21 Arrival Schedules

For inbound operations, receiving offices must have visual aids showing a profile of trip arrivals, including pertinent information such as route, trip, scheduled arrival time, and transfer information for cross dock items to meet outbound dispatches. When appropriate, post transfer information with separate times depending on mail make-up, such as separate transfer times for both direct and working pallets, for direct and working rolling stock, and for loose sacks. This instruction is not applicable when using electronic arrival profiles (such as the Transportation Information Management and Evaluation System (TIMES) or the Transportation Routing Information Panel System (TRIPS)) or for BMCs and offices with mechanized unloading-to-machine distribution.

475.22 Special Instructions

For each inbound trip with a distinct load configuration, receiving offices must have visual aids showing the separations (or other unique features) expected on the trip, the content of the separations, and special handling instructions. Hard copy visual aids are not applicable when information is available through electronic devices, such as computer monitors mounted on the platform.

475.3 Outbound Trips

475.31 Loading Diagrams

For each outbound trip, dispatching offices must have visual aids showing the individual and/or inclusive ZIP Codes to be dispatched, and other unique features, such as for tailgating mail. Hard copy visual aids are not applicable when information is available through electronic devices, such as computer monitors mounted on the platform.

475.32 Dispatch Schedule

For each outbound trip, dispatching offices must have visual aids showing a profile for outbound dispatches, including route, trip, scheduled departure time, and other unique features. This instruction is not necessary when sufficient instruction is provided by electronic dispatch tools, such as TIMES and TRIPS.

476 Sealing Program and Procedures

476.1 General Requirement

All dispatching offices under the seal program, including contract mail handling facilities, must seal each outbound highway contract vehicle, rail intermodal vehicle (trailer, container, RoadRailer, or other rail or USPS-furnished vehicle), or rail boxcar, with numbered tin band seals, Item 0817A, and twisted wire seals, and complete Form 5398-A, Contract Route Vehicle Record. If an electronic transportation system such as TIMES is used, the tin band seal number must be entered in the appropriate place manually, or by scanning the barcode on the seal. Dispatching and receiving offices must have tin band seals, twisted wire seals, seal imprinters, and sealing and cutting tools.

Note: Twisted wire seals are never used alone when dispatching mail (excluding Mail Transport Equipment, see 476.2.c). They are always used in addition to numbered tin band seals and Form 5398-A.

476.2 Exemptions and Exceptions

In some cases, the seal system is not used at all or is used with minor deviations:

- a. Unstaffed Offices. Do not use the seal system for dispatches of mail to offices where vestibule exchange occurs, or where postal personnel are not normally on duty to accept delivery. Complete Form 5398-A and enclose it to verify that the load was in good condition and identify who closed it. Annotate Form 5398-A "SEAL NOT REQUIRED" to verify a seal was not used.
- b. Empty Vehicles. Do not seal empty trailers, vans, or rail vehicles.
- c. Mail Transport Equipment. Do not use a numbered tin band seal on dispatches of mail transport equipment. Use a twisted wire seal. If appropriate for additional security, use Form 5398-A and annotate it "SEAL NOT REQUIRED."
- d. Contract Vehicles. Small highway contract routes utilizing equipment with automobile type locks that are not sealable are exempt from the sealing requirements. Contract vehicles secured with contractor's padlocks are exempt from using twisted wire seals, but must use the numbered tin ban seal.
- Foreign Mail. Seal outbound international ocean containers with tin band seals and record serial numbers on the waybill documents. Do not use Form 5398-A.
- f. Outbound Military Mail. Seal all outbound military mail containers dispatched overseas via surface transportation with both twisted wire seals and numbered tin ban seals. Do not use Form 5398-A.
- g. Inbound Military Mail. Inbound military mail containers are sealed with only the numbered tin band seal. Do not use twisted wire seals.
- Postal Vehicle Service (PVS). PVS drivers must use cargo compartment door locks and, where applicable, postal padlocks, in accordance with PVS policy.

476.3 Disseminating Instructions

Dispatching offices must furnish necessary instructions to offices that receive sealed vans and are not familiar with the seal program. The instructions must include procedures for removing, verifying, and filing numbered seals and forms.

476.4 Necessary Supplies

The sealing program uses the following basic supplies:

- a. Item 0817A, Numbered Tin Band Seal.
- b. Form 5398-A, Contract Route Vehicle Record.
- c. Security seal imprinter.

- d. Twisted wire seal (12-inch section of 8-gauge steel wire band).
- e. Twisted wire sealing and cutting equipment (see 476.7).

476.5 Security

476.51 Numbered Seals

The manager at each postal facility or contract mail handling facility where numbered tin band seals are used must keep seals under lock and key. The manager designates a supervisor and a clerk as seal control officer and alternate seal control officer, respectively. The reserve stock of seals is under the exclusive control of the seal control officer and his/her alternate. The following guidelines also apply:

- a. Seals may be shipped from the factory in bulk quantities of several hundred or several thousand.
- Seals are issued to dock personnel in units of 100 or in units of a two-day supply, whichever is less.
- c. Seals must not be given to contract employees under any circumstances.

476.52 Sealing Discrepancies

476,521 General Rule

Any employee who notices a sealing irregularity (e.g., a discrepancy in a seal number or a broken or missing seal) must initial the related Form 5398-A and notify his/her supervisor. The supervisor must:

- a. Verify the irregularity and initial the Form 5398-A.
- b. Immediately report the irregularity by telephone both to the dispatching facility and to the appropriate Postal Inspector-in-Charge.
- c. Investigate the discrepancy to the best extent possible.
- d. Follow up the telephone report with a written report to both offices.
- e. Retain the seal and related form until the investigating postal inspector authorizes its release.

476.522 Special Cases

For a discrepancy involving either a double trailer or a relay driver (a driver other than the one who drove the first segment of the route), the employee discovering the discrepancy must determine the name of the driver and enter it on the Form 5398-A.

476.6 MultiDoor Vehicles

Special requirements for multidoor vehicles depend on whether or not the side doors are used en route:

a. Unused Side Doors. Side doors of highway contract vehicles that are never used must be permanently sealed by applying a twisted wire seal and a numbered tin band seal to the unused doors. The numbered tin band seal is recorded on Form 5398-A and placed in the local contract file. When sealing or removing the regular numbered seal from the rear doors of the vehicle, make a visual check to see that both the tin band seal and the twisted wire

- seal are intact on unused side doors. It is not necessary to verify the number of the special seal in every instance, but checks must be made at least quarterly.
- b. Used Side Doors. Multidoor vehicles with side doors that are used en route require numbered seals on both doors. Use one Form 5398-A for the side door, and another for the rear door. When unloading mail, remove only the seal on the door being opened. Verify the seal number on the other door.

476.7 Twisted Wire Seals

476.71 Applying Wire Seals

Twisted wire seals require approximately 90 seconds to affix and are fastened as follows:

- a. Insert a 12-inch section of 8-gauge steel wire rod halfway through the hasp of the door to be sealed.
- Bend the wire rod double and insert one end into a special twisting tool.
- c. Rotate the tool to catch the other end of the wire, thus twisting the wire into a tight knot that can be removed only with a bolt cutter.
- d. Twist the seal against the door hasp so that it cannot be untwisted with a screwdriver or a pair of pliers.

476.72 Removing Wire Seals

Cut the seals with at least a 14-inch bolt cutter. For personal safety, make the cut close to the hasp. To prevent the possibility of tire damage, do not let used seals fall to the ground. Place-used seals in the appropriate waste receptacle.

476.8 Form 5398-A

476.81 Applicability

Form 5398-A must be completed by all facilities (including BMCs) for each highway contract route vehicle, rail intermodal vehicle, and rail boxcar that is sealed with a numbered tin band seal. See 476.2 for exceptions.

476.82 Automatic Imprinting

A security seal imprinter is used to automatically record the date, name, and ZIP Code of the dispatching facility and the serial number(s) of the tin ban seal(s) on the Form(s) 5398-A. The imprinter can accommodate three tin band seals.

476.83 Dispatching Entries.

The dispatching employee must write certain entries on the Form 5398-A. These include:

- Name of the employee sealing the vehicle.
- b. Destination of the next facility to be served by the vehicle. (This may be an intermediate stop en route.)

- c. Driver's name. Exceptions: It is not necessary to show the driver's name when sealing:
 - (1) a rail intermodal vehicle or boxcar, or
 - (2) the first trailer of a double trailer trip (e.g., pups/twins) to the same destination. The driver must be identified on the Form 5398-A for the second trailer. See also 476.522.
- d. Departure Time and Date. When sealing rail vehicles in advance of the dispatch, or when sealing the first vehicle in a tandem dispatch, write the sealing time and date rather than the departure time and date.
- e. Registered mail is not identified or recorded on Form 5398-A.

476.84 Defective Seals

When sealing vehicle doors, dispatching employees who discover defective seals should submit them to their supervisors with the numerical sequence of those seals listed on a Form 5398-A.

476.85 Distribution

Form 5398-A is a three-part form: two soft (tissue) copies and a hard (index) copy. Copies are distributed and used as follows:

- a. First soft copy. Retain at dispatching facility.
- b. Second soft copy. Give to vehicle driver for use:
 - as a gate pass at facilities where access is controlled by security force personnel, and
 - (2) as a bill of lading at truck weigh stations or at en route inspections by regulatory agencies.
- c. Hard (index) copy. Place in open-ended envelope attached to the inside wall of the vehicle's cargo compartment. Do this immediately prior to closing and sealing the cargo doors.

476.86 Receiving Entries

Any employee who breaks the seal at the point of destination must process the Form 5398-A as follows:

- a. Enter name of employee breaking seal.
- b. Identify any discrepancies (see 476.52).
- c. Submit forms and seals for retention.

476.87 Retention

Forms 5398-A and related numbered seals must be filed and kept at the receiving facility for 15 days.

476.9 Registered Mail

Detailed procedures for registered mail are in Handbook DM-901, **Registered Mail Handbook**. The following are included in registered mail procedures for transportation contract operations:

- Contract drivers who are not under the security seal program are required to sign for registered mail.
- b. A postal employee must be assigned to receive and record all registered mail from contract drivers.
- c. A Nil-Bil system that will account for registered remittances. This requires a registered mail pouch even if no remittance is being sent that day.

477 Mail and Empty Mail Vehicle Arrivals

477.1 Recording Arrivals

All mail and empty mail vehicle arrivals (whether via scheduled transportation or extra trips) on contract or Postal Vehicle Service (PVS) must be recorded in the appropriate electronic system (such as the Transportation Information Management and Evaluation System (TIMES)) or on the appropriate form (see below). Complete the data entry or forms as required, and include additional remarks to explain deviations. Appropriate forms are:

Source of Mail	Record Trip Arrivals in Electronic System	Record Trip Arrivals on
Main office collection runs at CAG A-G offices	As availab le	Form 3968, Dally Mail Collection Record
Stations and branches via PVS	As available	Locally designed form
Stations and branches via highway contract route	As available	Form 5398, Transportation Performance Record
Associate offices via highway contract route	As available	Form 5398, Transportation Performance Record
Processing plants via highway contract route	TIMES (Transportation Information Management and Evaluation System)	Form 5398, Transportation Performance Record
AMF or airport	TIMES	Locally designed form or as required by Area Office Distribution Networks
Bulk mail center via highway contract route	TIMES, yard control system	Form 5398, Transportation Performance Record, Form 4460, Vehicle Record/Trip Ticket (card)

Bulk mail center via rail	TIMES, yard control ystem, and/or Rail Management Information System (RMIS)	Form 5398, Transportation Performance Record, Form 4460, Vehicle Record/Trip Ticket (card), Form 5186, Mail Movement Routing Instructions
Bulk mail center via PVS	TIMES, yard control system	Form 5398, Transportation Performance Record, Form 4460, Vehicle Record/Trip Ticket (card)
Local private mailers	Drop Shipment System for destination entry vehicles, TIMES, RMIS for rail vehicles, other as available	After verification, Form 8125, <i>Drop Shipment</i> Clearance Document, Form 8015, Plant Load Vehicle Log, or locally -designed forms, if warranted
Private mailers from other than local area	Drop Shipment System for destination entry vehicles, RMIS for rall vehicles, other as available	After verification, Form 8125, Drop Shipment Clearance Document, Form 8015, Plant Load Vehicle Log, or locally designed forms, if warranted

477.2 Forms 4460 and 5398

Receiving offices must record the arrival time and the unloading time for all trips (including extra highway route trips) as follows:

- a. BMCs use Forms 4460 and 5398 to record times. Other offices use Form 5398.
- b. Although most offices maintain Forms 4460 and 5398 at the platform, BMCs and certain large post offices may find it advantageous to maintain the forms at some other place, such as a vehicle operations office.

477.3 Form 5201, Mail Van Inspection

The purpose of Form 5201 is to show the condition of vehicles when received into the possession of the Postal Service. A properly completed Form 5201 records preexisting damage that should not be charged to the Postal Service. Form 5201 should be prepared for all arriving rail or leased vehicles, whether loaded or empty. Drivers picking up rail or leased vehicles should verify an inspection form provided by the location supplying the vehicle, or complete Form 5201 at the time of acceptance. A Form 5201 completed on departure from a facility may record damage caused to the vehicle while in the possession of the Postal Service. If requested by a driver at departure, complete Form 5201 and provide a copy to the driver. Follow instructions issued by the Area Office Distribution Networks to complete Form 5201.

477.4 Unloading

477.41 Instructions

All receiving facilities must have detailed unloading instructions for each platform operation. The detail necessary depends on the size and complexity of the office. The instructions should be posted as visual aids or easily available to platform employees. Always include instructions pertaining to the unloading of drop shipments that must be checked to ensure proper quantity and documentation of mail, and for business mail that must pass through acceptance procedures before processing. Also include procedures for handling surface preferential mail (periodicals), particularly tailgated surface preferential mail and Registered Mail. In some cases it is necessary to identify docks, belts, slides, and staging areas by number with visual aids, because this helps employees place specific mail items in the proper place.

477,42 Removing Seals

The designated platform employees at an unloading point must:

- a. Remove all numbered seals and twisted wire seals (see 476.72).
- b. Complete the appropriate parts of Form 5398-A (see 476.86).
- Identify any discrepancies (see 476.52).
- d. After verifying Form 5398-A against the actual seal number, dispose of numbered and twisted wire seals in a trash receptacle to prevent the possibility of vehicle tire damage.
- e. File Form 5398-A in an appropriate place for at least 15 days.

477,43 From Air Facilities

477.431 Responsible Employees

All employees who are responsible for the dispatch and receipt of mail at airport mail centers (AMCs) and facilities (AMFs) or local air stop points must be thoroughly familiar with the air contract data collection system, required forms contained in Handbook PO-507, *Air Contracting Administrative Procedures*, and procedures for air contract performance measurement, including scanning procedures.

477.432 Air Taxis

Use appropriate forms. See Handbook PO-509, Air Taxi Contract Administration.

477.5 Platform Transfers

477,51 Registered Mail

Registered mail must be handled according to registered mail procedures. In 1997, new procedures were issued by the Chief Postal Inspector and the Vice President, Operations Support, to area vice presidents. Among other changes, these procedures:

a. Required contract drivers not under the seal program to sign for registered mail.

- Assigned a postal employee to receive and record all registered mail from the contract drivers
- c. Implemented a Nil-Bil system to account for registered remittances, requiring a registered pouch even on days no remittance is sent.

477.52 Preferential Mail

Preferential mail must be given expeditious handling on platforms.

477.53 Transfer Failures

If a transfer failure is caused by poor supervisory judgment, local management must take immediate corrective action. If the transfer failure results from the late operation of a highway contract and is not caused by legitimate reasons:

- a. Processing plants, administrative offices, large installations, and other postal facilities complete Form 5500, Contract Route Irregularity Report, and distribute copies as instructed on the Form.
- Offices that do not use Form 5500 report irregularities to the appropriate administrative official of the contract involved using USPS routing slip, Supply Item 0-13, or other appropriate communication.
- c. If a transfer failure causes delay to a highway contract route (HCR) trip, a Form 5466, Late Slip, should be issued to the HCR driver.

477,54 Missent Mail

Notify responsible post offices, processing facilities, and BMCs of receipt of missent pouches, sacks, containers, and outside pieces of all classes of mail. Follow up to ensure problems have been corrected.

478 Mail and Empty Mail Vehicle Departures

478.1 Recording

All mail and empty mail vehicle departures (whether via scheduled transportation or extra trips) must be recorded in the appropriate electronic system (such as TIMES or other vehicle information system) or on the appropriate form (see table below). Complete the data entry or forms as required, and include additional remarks to explain deviations. Appropriate forms are:

Mail / Vehicle Destination	Record Departures in Electronic System	Record Departures on Form
Stations and branches via PVS	As available	Locally designed form
Stations and branches via highway contract route	As available	Form 5398, Transportation Performance Record
Associate offices via highway contract route	As available	Form 5398, <i>Transportation</i> Performance Record
Processing plants via highway contract route	TIMES (Transportation Information Management and Evaluation System)	Form 5398, Transportation Performance Record
AMF or airport	TIMES	Locally designed form or as required by Area Distribution Network Office

Bulk mail center via highway contract route	TIMES, vehicle information system	Form 5398, <i>Transportation</i> Performance Record, Form 4460, Vehicle Record/Trip Ticket (card)
Bulk mail center via rail	TIMES, vehicle information system, and/or Rail Management Information System (RMIS), Equipment Inventory Reporting System (EIRS) for mail transport equipment (MTE)	Form 5398, Transportation Performance Record, Form 4460, Vehicle Record/Trip Ticket (card), Form 5186, Mail Movement Routing Instructions for rail
Bulk mail center via PVS	TIMES, yard control system	Form 5398, Transportation Performance Record, Form 4460, Vehicle Record/Trip Ticket (card)
Rail Yard or Leased Vehicle Supplier	RMIS for rail vehicles, TIMES, vehicle information system, other as available	Form 5398, Transportation Performance Record, Form 4460, Vehicle Record/Trip Ticket (card), Form 5201, Mail Van Inspection Report, or locally designed forms, if warranted
Private mailers	RMIS for rail vehicles, TIMES, vehicle information system, EIRS for MTE, other as available	Form 5398, Transportation Performance Record, Form 5201, Mail Van Inspection Report, or locally designed forms, if warranted. After verification, Form 8125, Drop Shipment Clearance Document

478.2 Form 5201, Mail Van Inspection

A Form 5201 completed on departure from a facility may record damage caused to the vehicle while in the possession of the Postal Service. If requested by a driver at departure, complete Form 5201 and provide a copy to the driver. Follow instructions issued by the Area Office Distribution Networks to complete Form 5201. Form 5201 is initiated on vehicle arrival to document preexisting damage. See 477.3 regarding arrivals.

478.3 Scheduling Extra Trips

478.31 Postal Vehicle Service (PVS) Trips

Extra PVS trips are costly and should not be scheduled unless necessary to prevent delay of mail.

478.32 Highway Contract Route Trips

No office may request or schedule extra highway contract route trips unless necessary to prevent serious delay of preferential mail or justified because of mail volume. The following guidelines apply:

- Each highway contract route extra trip must have Form 5397, Contract Route Extra Trip Authorization, completed as certification for payment.
- b. The office authorizing the extra trip must issue Form 5397 and complete the appropriate sections.

- c. A copy of Form 5397 will be retained for at least one year in the office that issues Form 5429, Certification of Exceptional Contract Service Performed. Form 5429 must be retained at least 7 years. Record retention periods are also contained in the Administrative Support Manual and Handbook PO-513, Mail Transportation Procurement Handbook.
- d. Destination offices should be notified of extra trips in advance by telephone or electronic mail, and furnished Form 5397.
- e. Destination offices review and complete the appropriate sections of Form 5397 for destination office. If the extra trip ends at the destination office, the destination office distributes copies of the completed Form 5397 as instructed on the form. If the extra trip is operating round-trip, the destination office should dispatch any available volumes on the return leg of the extra trip.
- f. Form 5429, Certification of Exceptional Contract Service Performed, is completed by the office designated as Administrative Official (AO) for the highway contract route. The AO summarizes Forms 5397 onto Form 5429 at the end of each postal accounting period. The AO distributes copies of Form 5429 as required on the Form, including sending the completed Form 5429 to the postal Accounting Service Center for payment to the highway contract route contractor. Form 5429 must be retained at least 7 years.

478.4 To Air Facilities

Extra trips to air facilities are scheduled and documented in accordance with the requirements for the type of surface transportation used. Postal vehicle service trips are scheduled and operated in accordance with PVS requirements. Highway contract trips are scheduled in accordance with 478.32. See 477.3 regarding inspecting vehicles using Form 5201, *Mail Van Inspection*.

479 Special Mailer Preparation

479.1 General Explanation

Special mailer preparation offers benefits to both cost and efficiency. Mailers who prepare their mail in special ways do so for the following reasons:

- a. To qualify for automation rates.
- b. To reduce handling within the post office and thus expedite service. Platform employees must recognize specially prepared mail and handle it in a manner that takes advantage of the mailer preparation and expedites its movement through the processing plant to delivery. Some examples of specially prepared mail are cross dock pallets; mail in specialized cartons and containers; trayed, prebarcoded, and carner route sequenced mail; and ZIP Code sequenced (riffle) mail.
- c. To qualify for destination entry discounts under plant-verified drop shipment.

479.2 Cross Dock Pallets

Mailers may prepare pallets with mail all for a certain processing plant or delivery office. These pallets do not need to be broken until they reach the plant or office that processes mail with the specific ZIP Codes identified for the pallet. Cross dock pallets should therefore be moved from the delivery vehicle to the outbound trip intact. As a safeguard, contents on the pallet should be visually checked against the pallet label.

479.3 Specialized Cartons and Containers

Mailers may be provided specialized cartons and containers for loading mail. These cartons and containers are then loaded and unloaded with mechanized equipment, making the loading and unloading process faster. In some cases, mailers may be provided rolling containers for use within the closed loop of the processing plant's service area and the mailer's plant. Rolling containers are costly, their use must be monitored, and mailers should not keep them for a prolonged period of time. They should be promptly loaded and returned. An alternative to costly rolling containers is pallet-based cardboard box containers. They may be provided by the mailer or, if appropriate, postal facility. Rolling containers (or pallet-based containers) replace bedloading and expedite the loading and unloading of vehicles. Platform personnel should unload containers and promptly move them to the next operation.

479.4 Trayed Mail

Depending on the degree of makeup and the manner in which postage is paid, platform personnel must develop a system (with the approval of the manager responsible for plant operations) that ensures trayed mail is handled expeditiously. Platform supervisors should utilize any or all of the following tags or labels to assist in the correct routing of trayed mail:

Label/Tag	Used for
LABEL 204	First-Class Presorted - All for ZIP Code on Face
LABEL 205	First-Class Presorted - All for First 3 Digits of ZIP Code
LABEL 207	OCR Machine Readable
TAG 13	Mailer Prepared Scheduled Mail
TAG 23	Presorted First-Class Sack, Green
TAG 24	Presorted First-Class Sack, 5-Digit
TAG 25	Presorted First-Class Sack, 3-Digit
TAG 57	Political Campaign Mailing
TAG 122	Carrier Presorted Mail

479.5 ZIP Code Sequence (Riffle) Mail

ZiP Code sequence or riffle mail consists of letters and flats that have been customer-sequenced by ZIP Code, state, or otherwise (processing category, outgoing or incoming schemes). Platform personnel should familiarize themselves with mail arriving at the platform to locate, identify, and correctly route riffle mail. A local method of identifying the pallets, containers, trays, or sacks of riffle mail must be established.

479.6 Destination Entry Mail (PVDS-Plant Verified Drop Shipment)

479.61 General

Plant verified drop shipments (PVDS) are considered freight until such time as they are actually deposited at the destination facility where they will be accepted as mail. Mailers (or their agents) may request specific dates for appointments and unloading of destination entry mail at postal facilities. Mailers must request appointments in advance by using either the drop shipment appointment system (DSAS) or by calling the local drop shipment appointment control center or local drop shipment coordinator (depending on locale, the appropriate drop shipment appointment control center/coordinator may be the one serving the destination entry location, as opposed to serving the mailer plant origin). Conditions for unloading product from the mailer's or mailer's agent's vehicle are that the load must be in good condition, clearly identified, all mail properly prepared, and all official forms and paperwork present and properly completed. Some general provisions follow. For specific procedures, see separately published guidelines for drop shipment mail.

479.62 Prior Authorization

Prior clearance is required before accepting drop shipment mail. An appointment or reservation is generally needed, and electronic authorization or specific clearance documents must be presented along with mail being deposited. Prior to being issued a PVDS authorization the mailer must have either an existing USPS detached mail unit (usually established with a plant load authorization), or a postage payment agreement, specifying how PVDS postage is to be verified. Form 8125, *Drop Shipment Clearance Document*, is required to accompany each shipment and be presented to the Postal Service with mail being deposited.

479.63 Plant-Verified Drop Shipment Seal

The mailer's vehicle may be sealed with the blue plastic seal used specifically for drop shipments. If a seal is present, the employee breaking the seal must verify the number against the seal number recorded on accompanying documents. If the seal number disagrees with the number on PS Form 8125, *Drop Shipment Clearance Document*, contact the mail acceptance office.

479.7 Staging for Scheduled Delivery

Mailers of nonpreferential Periodicals and Standard Mail (A) may request specific delivery dates for their mail, provided that they furnish the mail to post offices sufficiently in advance of the scheduled delivery date. General delivery commitments are dependent upon level of presort and place of deposit as described in 458. The requested delivery date should be no earlier than normal service commitments would indicate.

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.

Anthony F. Alvarno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 September 3, 1997