

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

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(UPS/USPS-T39-1-59)

The United States Postal Service hereby provides responses of witness Kingsley to the following interrogatories of United Parcel Service: UPS/USPS-T39-1-59, filed on November 1, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 15, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-1** List by category the sources of origin for all letter-shaped mail processed at MODS facilities (e.g., Associate Offices, BMCs, drop shipment by bulk mailers, etc.)

**Response:**

- Collection Mail
  - Collection boxes
  - Collection routes
  - Carrier pick-ups at delivery points
  - Retail Units
- Bulk Mail
  - Bulk Mail Entry Units at postal facilities (associate offices, plants, etc.)
  - Plant loaded onto postal transportation at mailer plants
  - Drop shipped by mailers into postal facilities

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-2** For each source of origin for letter-shaped mail processed at MODS facilities, indicate the fraction of incoming letters at MODS facilities arriving from that source in the base year. If exact figures are not available, provide approximate estimates.

**Response:**

It is my understanding that data are not collected based on the source of entry. I am unaware of any data on which to base an estimate.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-3** Are incoming letters from the various points of origin for letter-shaped mail processed at MODS facilities processed in the same way? If not, describe the culling and opening operations for incoming letters from each of the points of origin.

**Response:**

Once mail arrives at the plant, the general source is usually irrelevant. There are no consistent processing differences within the categories of collection mail letters and bulk mail letters based on the source of entry. There are, however, differences in the mail prep and opening operations between the categories of collection mail letters and bulk mail letters. Collection mail must be dumped onto culling belts and processed on canceling equipment (unless metered and already placed in trays by the customer) prior to piece distribution operations to be faced and cancelled, if necessary. For most bulk mail letter trays, it is simply necessary to remove the sleeves and sort the trays based on the target piece distribution operation. Some trays of presorted letters do contain bundles of letters, which also need to be sorted prior to piece distribution.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-4** List by category the sources of origin for all flats processed at MODS facilities (e.g., Associate Offices, BMCs, drop shipment by bulk mailers, etc.)

**Response:**

See response to UPS/USPS-T-39-1.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-5** For each source of origin for all flats processed at MODS facilities, indicate the fraction of incoming flats at MODS facilities arriving from that source in the base year. If exact figures are not available, provide approximate estimates.

**Response:**

See response to UPS/USPS-T-39-2.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-6** Are incoming flats from the points of origin for all flats processed at MODS facilities processed in the same way? If not, describe the culling and opening operations for incoming flats from each of the points of origin.

**Response:**

Once mail arrives at the plant, the general source is usually irrelevant. There are no processing differences within the categories of collection mail flats and bulk mail flats based on the source of entry. There are, however, differences in the mail prep and opening operations between the categories of collection mail flats and bulk mail flats. Collection mail must be dumped onto culling belts and processed on canceling equipment (unless metered and already placed in trays by the customer) prior to piece distribution operations. Bulk mail flats are prepared in trays (First-Class Mail) or in sacks or on pallets (Periodicals, Standard Mail, and BPM). For bulk mail flats trays, it is simply necessary to remove the lids and sort the trays based on the target piece distribution operation. Some bundle sort may be required. For sacks and pallets, the packages must be dumped from the sacks and off the pallets. Subsequently, the packages must be sorted to the appropriate piece distribution operation or to another downstream facility. Ultimately, the packages are opened and the pieces are distributed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-7** List by category the sources of origin for all parcels processed at MODS facilities (e.g., Associate Offices, BMCs, drop shipment by bulk mailers, etc.).

**Response:**

See response to UPS/USPS-T-39-1.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-8** For each of the sources of origin for parcels processed at MODS facilities, indicate the fraction of incoming parcels at MODS facilities arriving from that source in the base year. If exact figures are not available, provide approximate estimates.

**Response:**

See response to UPS/USPS-T-39-2.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-9** Are incoming parcels from the various points of origin for parcels processed at MODS facilities processed in the same way? If not, describe the culling and opening operations for incoming parcels from each of the points of origin.

**Response:**

No. Parcels entered through retail units are typically separated into containers at the time of acceptance by class (e.g. Express Mail, Priority, Parcel Post, etc.) for downstream processing. Containers of Package Services parcels will typically be transferred through a processing and distribution center to a Bulk Mail Center for processing. Containers of First-Class Mail, Priority Mail, and Express Mail are usually processed separately at processing and distribution centers. Some Priority Mail and Express Mail may be processed at an Air Mail Center. In certain geographic areas, Priority Mail parcels are processed in dedicated Priority Mail processing facilities.

There are no consistent processing differences within the category of bulk mail parcels based on the source of entry, however, the mail prep and opening operations for bulk mail parcels differ from parcels entered through retail units. Bulk mail parcels are likely to be prepared in sacks, on pallets, or bedloaded. A sack containing parcels is either sorted to a downstream operation/facility or dumped for piece distribution. A pallet containing parcels is either cross-docked to a downstream facility or dumped for piece distribution. Bedloaded parcels are unloaded and the pieces distributed. The facility at which these operations occur is based on the class of mail and consistent with the above paragraph.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-10** Refer to page 2, lines 19-20, of your testimony, in which you describe "stamped mail" and "hampers of single-piece collection mail." Is all single piece collection mail stamped mail? If not, what other types of mail are included in the hampers?

**Response:** No. Metered mail is also included in single piece collection mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-11** Does all of the stamped mail get processed through the Advanced Facer Cancellation System (AFCS), as described on page 2, lines 19-22, of your testimony?

**Response:** No. The vast majority of letters and cards do get processed on the AFCS. Flats are cancelled on a flats canceller. Thick, rigid, and "hand-stamp only" pieces are hand cancelled. Also see response to USP/USPS-T-39-14.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-12** Refer to page 2, section A of your testimony ("Letter and Card Mail Processing"), in which you describe mail processing operation "010." On page 2, lines 17 through 18, you state that, "This operation is where letters, flats, and parcels are separated for subsequent handling." Does the discussion on page 2, lines 15 through 24, of your testimony apply to sections B and C of your testimony, where you discuss flats and parcel processing?

**Response:**

Yes, though only for First-Class flats and parcels. Other classes of mail (except for Express Mail and Priority Mail), regardless of shape, do not go through the "010" operation.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-13** *Is the Advanced Facer Cancellation System part of the allied operations? If so, explain why it is not discussed in section D of your testimony, titled "Allied Operations." If not, explain the distinction between the allied operations described in section D of your testimony (page 26, lines 20-21) and the facing and canceling described in section A of your testimony (page 2, lines 19-24).*

**Response:**

Yes. The AFCS is specific to letter/card processing and mailflows while allied is generally not shape specific. Therefore, Section A seemed a more appropriate place within my testimony to discuss the AFCS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-14** Do all letters, flats, and parcels -- even those that are eventually sorted in the manual operations -- first get processed through the Advanced Facer Cancellation System?

**Response:**

No. Given the description of AFCS on page 2, lines 22 through 23, of my testimony, flats and parcels would not fit through the AFCS for processing.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-15** Refer to page 3, line 17 through page 4, line 7, of your testimony. Are all rejects from the Advanced Facer Cancellation System subsequently processed in manual operations? If not, how are rejects processed?

**Response:** All rejects from the Advanced Facer Canceller System are faced and reoriented to run a second time through the AFCS. Letters sometimes stick together when run through initially. Rejects from the second run are then sent to a downstream operation such as the outgoing OCR/ISS or manual operation depending upon if the piece is machinable or lacks postage.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-16** Refer to your testimony at page 14, footnote 15, where you state that, "An opening unit is the operational area within a processing facility where sacks and containers of mail are opened and prepared for distribution." Does all incoming mail go through an opening unit operation, including collection mail and all mail incoming from a BMC? If not, describe all types of mail that go through an opening unit operation.

**Response:**

Yes, of one kind or another at a mail processing facility or delivery unit.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-17** *Does all collection mail arriving at MODS facilities come from local post offices?*

**Response:** Collection mail comes from local post offices and retail units or drop boxes at the plant.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-18** Describe the types of mail arriving at a MODS facility that are first processed on a Bar Code Sorter (BCS) and hence are counted as part of BCS First Handling Pieces.

**Response:**

Any machineable letter could have its first distribution handling on a BCS and receive FHP credit. If the BCS is in BCS mode, the letter would have to have a barcode.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-19** How is First Handling Pieces measured for the mail streams that arrive at a MODS facility and are first processed on a Bar Code Sorter?

**Response:**

Mail coming directly from the AFCS is counted for FHP on the BCS using the AFCS machine count. Almost all other FHP counts are derived from scale transactions using a pounds-to-pieces conversion factor. On a few occasions, the piece count is obtained from the mailing statement and entered in MODS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-20** Describe the types of mail that are processed in the Bar Code Sorter ("BCS") operation but do not get counted as First Handling Pieces in the BCS operation.

**Response:**

Any mail that has already been sorted within that facility would not get an FHP credit.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-21** Indicate the MODS operations in which the mail streams that are processed in the Bar Code Sorter ("BCS") operation but do not get counted as First Handling Pieces ("FHP") in the BCS operation might get counted as FHP?

**Response:**

They would have been sorted in a prior BCS operation or on a MLOCR.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-22** Describe the types of mail arriving at a MODS facility that are first processed on a Bar Code Sorter/Delivery Bar Code Sorter (BCS/DBCS) and hence are counted as part of BCS/DBCS First Handling Pieces.

**Response:**

See UPS/USPS-T-39-18. Within the BCS family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-23** How is First Handling Pieces measured for the mail streams arriving at a MODS facility that are first processed on a Bar Code Sorter/Delivery Bar Code Sorter?

**Response:**

See UPS/USPS-T-39-19. Within the BCS family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-24** Describe the types of mail that are processed in the Bar Code Sorter/Delivery Bar Code Sorter ("BCS/DBCS") operation but do not get counted as First Handling Pieces in the BCS/DBCS operation.

**Response:**

See UPS/USPS-T-39-20. Within the BCS family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-25** Indicate the MODS operations in which the mail streams that are processed in the Bar Code Sorter/Delivery Bar Code Sorter (BCS/DBCS) operation but do not get counted as First Handling Pieces (FHP) in the BCS/DBCS operation might get counted as FHP?

**Response:**

See UPS/USPS-T-39-21. Within the BCS family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-26** Describe the types of mail arriving at a MODS facility that are first processed on a Flat Sorting Machine ("FSM") and hence are counted as part of FSM First Handling Pieces.

**Response:**

Any machinable flat mail could be sorted first on an FSM and receive FHP credit.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-27** *How is First Handling Pieces measured for the mail arriving at a MODS facility that are first processed on a Flat Sorting Machine ("FSM")?*

**Response:**

Almost all FHP counts are derived from scale transactions using pounds-to-pieces conversion factors. On occasion, the piece count is obtained from the mailing statement and entered in MODS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-28** Describe the types of mail that are processed in the Flat Sorting Machine ("FSM") operation but do not get counted as First Handling Pieces in the FSM operation.

**Response:**

Any mail that has already been sorted within the facility would not get an FHP credit.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-29** Indicate the MODS operations in which the mail that is processed in the Flat Sorting Machine ("FSM") operation but does not get counted as First Handling Pieces ("FHP") in the FSM operation might get counted as FHP?

**Response:**

It would have received FHP credit in a prior FSM operation within the facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-30** Describe the types of mail arriving at a MODS facility that are first processed on a FSM 1000 and hence are counted as part of FSM 1000 First Handling Pieces.

**Response:**

Any flats that are machinable on the FSM-1000 could be first distributed and receive FHP credit on the FSM-1000. However, if the flats were machinable on the FSM-881 or AFSM 100, it is more likely that they would be first distributed and receive FHP credit on those machines.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-31** How is First Handling Pieces ("FHP") measured for the mail arriving at a MODS facility that is first processed on a Flat Sorting Machine/1000 ("FSM/1000") and hence is counted as part of FSM/1000 FHP?

**Response:**

See UPS/USPS-T-39-27. Within the FSM family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-32** Describe the types of mail that are processed in the FSM/1000 operation but do not get counted as First Handling Pieces ("FHP") in the FSM/1000 operation.

**Response:**

See UPS/USPS-T-39-28. Within the FSM family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-33** Indicate the MODS operations in which the mail that is processed in the FSM/1000 operation but does not get counted as First Handling Pieces ("FHP") in the FSM/1000 operation might get counted as FHP?

**Response:**

See UPS/USPS-T-39-29. Within the FSM family, the machine type is immaterial for FHP.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-34** Describe the types of mail arriving at a MODS facility that are first processed on an Optical Character Reader (OCR) and hence are counted as part of OCR First Handling Pieces.

**Response:**

I assume you are referring to a MLOCR or DIOSS in OCR or ISS mode. Any machinable letter mail could be first processed on this equipment. The majority of this mail would not have a barcode.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-35** How is First Handling Pieces ("FHP") measured for the mail arriving at a MODS facility that is first processed on an Optical Character Reader (OCR) and hence is counted as part of OCR FHP?

**Response:**

Mail coming directly from the AFCS is counted for FHP on the OCR using the AFCS machine count. Almost all other FHP counts are derived from scale transactions using a pounds-to-pieces conversion factor. On a few occasions, the piece count is obtained from the mailing statement and entered in MODS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-36** Describe the types of mail that are processed in the Optical Character Reader ("OCR") operation but do not get counted as First Handling Pieces in the OCR operation.

**Response:**

Mail that was rejected by another distribution operation, generally due to a non-read of the barcode, could be distributed on an OCR but would not receive FHP credit. Also, mail distributed on an OCR could get a second handling on an OCR if an appropriate BCS operation is not available.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-37** Indicate the MODS operations in which the mail that is *processed in the Optical Character Reader ("OCR") operation but does not get counted as First Handling Pieces ("FHP") in the OCR operation might get counted as FHP?*

**Response:**

Any prior BCS or OCR operation within the facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-38** Describe the types of mail arriving at a MODS facility that are first processed on a Small Parcel and Bundle Sorter (SPBS) and hence are counted as part of SPBS First Handling Pieces.

**Response:**

Only Priority mail gets FHP credit on the SPBS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-39** How is First Handling Pieces measured for the mail arriving at a MODS facility that is first processed on a Small Parcel and Bundle Sorter (SPBS) and hence is counted as part of SPBS First Handling Pieces?

**Response:**

The SBPS machine count of pieces fed is entered in MODS to record FHP for Priority mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-40** Describe the types of mail that are processed in the Small Parcel and Bundle Sorter ("SPBS") operation but do not get counted as First Handling Pieces in the SPBS operation.

**Response:**

Small parcels, bundles or irregular parcel post that are not Priority Mail do not get FHP credit on the SPBS. For FHP purposes, the SPBS is not considered a distribution operation for anything but Priority Mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-41** Indicate the MODS operations in which the mail that is processed in the Small Parcel and Bundle Sorter ("SPBS") operation but does not get counted as First Handling Pieces ("FHP") in the SPBS operation might get counted as FHP?

**Response:**

These pieces do not receive FHP credit unless they are Priority Mail which could receive FHP credit in a prior SPBS or flat sorting machine operation.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-42** Describe the types of mail arriving at a MODS facility that are first processed on a Letter Sorting Machine (LSM) and hence are counted as part of LSM First Handling Pieces.

**Response:** None. LSMs are no longer in operation. See page 4, lines 14-16 of my testimony.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-43** How is First Handing (sic) Pieces measured for the mail arriving at a MODS facility that is first processed on a Letter Sorting Machine (LSM)?

**Response:** See response to UPS/USPS-T-39-42.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-44** Describe the types of mail that are processed in the Letter Sorting Machine ("LSM") operation but do not get counted as First Handling Pieces in the LSM operation.

**Response:** See response to UPS/USPS-T-39-42.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-45** Indicate the MODS operations in which the mail that is processed in the Letter Sorting Machine ("LSM") operation but does not get counted as First Handling Pieces ("FHP") in the LSM operation might get counted as FHP?

**Response:** See response to UPS/USPS-T-39-42.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
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**UPS/USPS-T-39-46** Describe the types of mail arriving at a MODS facility that are first processed in the Manual Flats operation and hence are counted as part of Manual Flats First Handling Pieces.

**Response:**

Any flats that are sent to the Manual Flats operations without being previously distributed in another distribution operation within the same facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-47** How is First Handling Pieces measured for the mail arriving at a MODS facility that are first processed in the Manual Flats operation?

**Response:**

Almost all FHP counts are derived from scale transactions using a pounds-to-pieces conversion factor. On a few occasions, the piece count is obtained from the mailing statement and entered in MODS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-48** Describe the types of mail that are processed in the Manual Flats operation but do not get counted as First Handling Pieces in that operation.

**Response:**

Flats that were previously processed in another distribution operation, including machinable flats that were rejected by a flat sorting machine operation.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-49** Indicate the MODS operations in which the mail that is processed in the Manual Flats operation but does not get counted as First Handling Pieces ("FHP") in that operation might get counted as FHP?

**Response:**

Any other flats distribution operation within the same facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-50** Describe the types of mail arriving at a MODS facility that are first processed in the Manual Letters operation and hence are counted as part of Manual Letters First Handling Pieces.

**Response:**

Any letters sent to the manual letter operations without being previously distributed in another distribution operation within the same facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-51** How is First Handling Pieces ("FHP") measured for the mail arriving at a MODS facility that is first processed in the Manual Letters operation?

**Response:**

See UPS/USPS-T-39-47.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-52** Describe the types of mail that are processed in the Manual Letters operation but do not get counted as First Handling Pieces in that operation.

**Response:**

Letters that were previously distributed in another letter distribution operation, including machinable letters that were rejected by a letter sorting machine.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-53** Indicate the MODS operations in which the mail that is processed in the Manual Letters operation but does not get counted as First Handling Pieces ("FHP") in that operation might get counted as FHP?

**Response:**

Any other letter distribution operation within the same facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-54** Describe the types of mail arriving at a MODS facility that are first processed in the Manual Priority operation and hence are counted as part of Manual Priority First Handling Pieces.

**Response:**

Any Priority mail could be first distributed and receive FHP credit in a Manual Priority operation.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-55** How is First Handling Pieces ("FHP") measured for each type of mail arriving at a MODS facility that is first processed in the Manual Priority operation and hence is counted as part of Manual Priority FHP?

**Response:**

FHP counts for Priority mail are derived from scale transactions, from the mailing statement, or from container conversion factors.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T-39-56** Describe the types of mail that are processed in the Manual Priority operation but do not get counted as First Handling Pieces in that operation.

**Response:**

Any Priority mail that has already been distributed by another distribution operation within the same facility, including rejects from the SPBS or flat sorting machines.

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**UPS/USPS-T-39-57** Indicate the MODS operations in which the mail that is processed in the Manual Priority operation but does not get counted as First Handling Pieces ("FHP") in that operation might get counted as FHP.

**Response:**

It could have been distributed in any SPBS or flat sorting operation

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**UPS/USPS-T-39-58** Explain the differences between a BMC and an Auxiliary Service Facility (ASF) and what determines whether a parcel is processed at a BMC or an ASF.

**Response:**

ASFs are Processing and Distribution Centers (P&DCs) that process all classes of mail. Therefore, the designation "ASF" is more of a label to represent that some P&DCs serve as an "auxiliary" or "subsidiary" operation to BMCs.

Each ASF has a "parent" BMC. For example, the "parent" BMC for the Salt Lake City ASF is Denver. Therefore, the service areas for the Salt Lake City ASF and the Denver BMC overlap, with the Salt Lake City ASF service area consisting of a small portion of the Denver BMC service area. So, each BMC has a dedicated service area that is only served by the BMC, but may also have some ZIP Code ranges within its service area also served by a "child" ASF. ASFs were added to assist BMCs that had large service areas or covered considerable distances (such as, Denver BMC).

BMCs and ASFs play a similar role in the processing of Package Services and Standard Mail. Both BMCs and ASFs process parcels as well as sacks and pallets of Standard and BPM Mail for specific ZIP Code ranges. Customers dropship mail into both BMCs and ASFs based, again, on these ZIP Code ranges. BMCs use large-scale parcel and sack/tray sorting equipment, while ASFs typically use smaller systems or possibly manual sortation, for parcel, sack,

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and tray distribution. Both BMCs and ASFs typically use Small Parcel and Bundle Sorters (SPBSs) to sort flat bundles from sacks or pallets. See DMM L601 and L602.

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**UPS/USPS-T-39-59** When was the first Auxiliary Service Facility ("ASF") introduced into the postal network?

**Response:**

The plants began assuming the responsibilities of an ASF network facility in late 1975.

**DECLARATION**

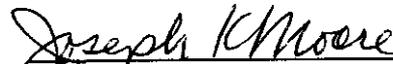
I, Linda A. Kingsley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

*Linda A. Kingsley*  
LINDA A. KINGSLEY

Dated: 11/15/01

## 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.

  
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Joseph K. Moore

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
November 15, 2001