

**BEFORE THE
POSTAL RATE COMMISSION**

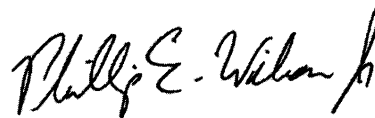
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
(UPS/USPS-T39- 60 through 65)
(November 29, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatories directed to United States Postal Service witness Kingsley: UPS/USPS-T39-60 through 65.

Respectfully submitted,



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

UPS/USPS-T39-60. Refer to library reference USPS-LR-J-161, file “equipment.xls,” which maps Property Code Numbers (“PCN”s) to equipment name.

The following questions pertain to letter sorting equipment found in that file.

(a) Confirm that the following represents a comprehensive list of all types of equipment that are used, either in isolation or in combination with others, for sorting mail in the Letter Sorting Machine (“LSM”) Management Operating Data System (“MODS”) operation.

PCN	Equipment Name
910000	LETTER SORTING MACHINE, MULTI POS
910010	LETTER SORTING MACHINE, SINGLE
910020	LSM TRAY CONVEYOR SYSTEM
910030	LSM – ZIP MAIL TRANSLATOR
910034	LSM – ELECTRONIC SORT PROCESSOR
910091	LSM – EXPANDED ZIP RETROFIT
910092	LSM - EZR MAINTENANCE TERMINAL
910093	LSM MISC MODIFICATION COST
910094	LSM – VACUUM SYSTEM

(b) If you cannot confirm in part (a), is the list above over-inclusive or incomplete?

(i) If over-inclusive, explain which pieces of equipment are not used in the LSM MODS operation.

(ii) If incomplete, list and describe other equipment that can be used to sort mail in the LSM MODS operation. Provide an electronic spreadsheet indicating which of the facilities listed in library reference USPS-LR-J-56, file “reg9300-labels.xls,” have such equipment.

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

(c) Using the PCNs listed above, provide the minimum configuration necessary for a plant to process letters in the LSM MODS operation.

UPS/USPS-T39-61. Refer to library reference USPS-LR-J-161, file "equipment.xls," which maps Property Code Numbers ("PCN"s) to equipment name. The following questions pertain to flat sorting equipment found in that file.

(a) Confirm that the following represents a comprehensive list of all types of equipment that are used, either in isolation or in combination with others, for sorting mail in the Flat Sorter Machine ("FSM") Management Operating Data System ("MODS") operation.

PCN	Equipment Name
920000	FLAT SORTER MACHINE
920010	FLAT SORTER BIN UNIT
920020	FLAT SORTER CULL UNIT
920030	FLAT SORTER EXTRACTOR UNIT
920040	FLAT SORTER FEED UNIT

(b) If you cannot confirm part (a), is the list above over-inclusive or incomplete?

(i) If over-inclusive, explain which pieces of equipment are not used in the FSM MODS operation.

(ii) If incomplete, list and describe other equipment that can be used to sort mail in the FSM MODS operation. Provide an electronic spreadsheet indicating which of the facilities listed in library reference USPS-LR-J-56, file "reg9300.xls," have this other equipment.

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

(c) Is it possible to use the PCNs shown above to distinguish between FSM1000s and other flat sorting machines?

(i) If so, which PCNs indicate the presence of FSM1000s and which indicate the presence of other flat sorting machines in a facility?

(ii) If not, provide a more detailed equipment list that can be used to identify the number of FMS1000s and the number of FMS machines are located at each of the facilities listed in library reference USPS-LR-J-56 file "reg9300.xls."

(d) Using the PCNs listed above, provide the minimum configuration necessary for a plant to process flats in the FSM MODS operation.

UPS/USPS-T39-62. Refer to library reference USPS-LR-J-161, file "equipment.xls," which maps Property Code Numbers ("PCN"s) to equipment name. The following questions pertain to Optical Character Reader ("OCR") equipment found in that file.

(a) Confirm that the following represents a comprehensive list of all types of equipment that are used, either in isolation or in combination with others, for sorting mail in the OCR Management Operating Data System ("MODS") operation.

PCN	Equipment Name
960000	READER, OPTICAL CHARACTER
960010	READER, OPTICAL CHARACTER (OCR/CS)
960020	REMOTE BAR CODING IMAGE PROCESS SYS

(b) If you cannot confirm in part (a), is the list above over-inclusive or incomplete?

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

(i) If over-inclusive, explain which pieces of equipment are not used in the OCR MODS operation.

(ii) If incomplete, list and describe other equipment that can be used to sort mail in the OCR MODS operation. Provide an electronic spreadsheet indicating which of the facilities listed in library reference USPS-LR-J-56, file "reg9300.xls," have such equipment.

(c) Explain the difference between PCN 960000 (Optical Character Reader) and PCN 960010 (Optical Character Reader (OCR/CS)).

(d) Using the PCNs listed above, provide the minimum configuration necessary for a plant to process flats in the Flats Sorting Machine ("FSM") MODS operation.

UPS/USPS-T39-63. Refer to library reference USPS-LR-J-161, file "equipment.xls," which maps Property Code Numbers ("PCN"s) to equipment name. The following questions pertain to Bar Code sorting equipment found in that file.

(a) Confirm that the following represents a comprehensive list of all types of equipment that are used, either in isolation or in combination with others, for sorting mail in the Bar Code Sorter ("BCS") Management Operating Data System ("MODS") operation.

PCN	<i>Equipment Name</i>
950000	BAR CODE READER
950010	SMALL BAR CODE SORTER (SBCS)
950020	DELIVERY BAR CODE SORTERS (DBCS)

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

(b) If you cannot confirm in part (a), is the list above over-inclusive or incomplete?

(i) If over-inclusive, which pieces of equipment are not used in the BCS MODS operation.

(ii) If incomplete, list and describe other equipment that can be used to sort mail in the BCS MODS operation. Provide an electronic spreadsheet indicating which of the facilities listed in reference UPS-LR-J-056, file "reg9300.xls," have such equipment.

(c) Describe in detail the capabilities and use of PCN 950000 (Bar Code Reader), including how it is used, what it is used for, and what type or types of mail the machine processes.

(d) Describe in detail the capabilities and use of PCN 950010 (Small Bar Code Sorter), including how it is used, what it is used for, and what type or types of mail the machine processes.

(e) Distinguish between the capabilities and uses of PCN 950000 and 950010 (Bar Code Reader and Small Bar Code Sorter, respectively).

(f) Using the PCNs listed above, provide the minimum configuration necessary for a plant to process mail in the BCS MODS operation.

UPS/USPS-T39-64. Refer to library reference USPS-LR-J-161, file "equipment.xls," which maps Property Code Numbers ("PCN"s) to equipment name. The following questions pertain to parcel sorting equipment found in that file.

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

(a) Confirm that the following represents a comprehensive list of all types of equipment that are used, either in isolation or in combination with others, for sorting mail in the Small Parcel/Bundle Sorter (“SPBS”) Management Operating Data System (“MODS”) operation.

PCN	<i>Equipment Name</i>
930000	PARCEL SORTING MACHINE
930040	SMALL PARCEL/BUNDLE SORTER SYSTEM
930050	SMALL PARCEL/ROLL SORTER SYSTEM

(b) If you cannot confirm in part (a), is the list above over-inclusive or incomplete?

(i) If over-inclusive, which pieces of equipment are not used in the SPBS MODS operation?

(ii) If incomplete, list and describe other equipment that can be used to sort mail in the SPBS MODS operation. Provide an electronic spreadsheet indicating which of the facilities listed in library reference USPS-LR-J-56, file “reg9300.xls,” have such equipment.

(c) Is the Parcel Sorting Machine (PCN 930000) present at a Bulk Mail Center (BMC), a Processing and Distribution Center (P&DC), or both?

(d) Is the Small Parcel/Bundle Sorter System (PCN 930040) present at a BMC, a P&DC, or both?

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

(e) Describe in detail the capabilities and use of a Parcel Sorting Machine (PCN 930000), including how it is used, what it is used for, and what type or types of mail the machine processes. Is PCN 930000 used at a BMC, a P&DC, or both?

(f) Describe in detail the capabilities and use of a Small Parcel/Bundle Sorter System (PCN 930040), including how it is used, what it is used for, and what type or types of mail the machine processes. Is PCN 930040 used at a BMC, a P&DC, or both?

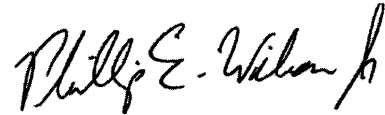
(g) Describe in detail the capabilities and use of a Small Parcel/Roll Sorter System (PCN 930050), including how it is used, what it is used for, and what type or types of mail the machine processes. Is PCN 930050 used at a BMC, a P&DC, or both?

UPS/USPS-T39-65. Refer to library reference USPS-LR-J-161, file "equipment.xls," which maps Property Code Numbers ("PCN"s) to equipment name. For each of the following pieces of equipment listed in that file, explain whether each is found only at a Bulk Mail Center ("BMC"), only at a Processing and Distribution Center ("P&DC"), or both.

PCN	Equipment Name
970010	BMC INBOUND-OUTBOUND TOW CONVEYOR
970020	BMC PARCEL SORTING INDUCTION UNIT
970022	BMC PARCEL SORTING MACHINE
970029	BMC PARCEL SORTING MACH MOD COST
970030	BMC PROCESS CONTROL SYSTEM
970040	BMC SACK SHAKEOUT MACHINE
970050	BMC SACK SORTER AND LOADER
970060	BMC TOWVEYOR - INTERNAL TOW CONV
970062	BMC TOWVEYOR - WEARBAR LUBRICATOR

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: November 29, 2001
Philadelphia, PA

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