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

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POSTAL BATE COMPLET OF OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

### Docket No. R2001-1

## RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF UNITED PARCEL SERVICE REDIRECTED FROM WITNESS BOZZO (UPS/USPS-T14-6 (a-b))

The United States Postal Service hereby provides its response to the following

interrogatory of United Parcel Service: UPS/USPS-T14-6 (a-b), filed on November 21,

2001. This interrogatory was redirected to the Postal Service from witness Bozzo.

The 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

Frank R. Heselton

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–4823; Fax –5402 December 5, 2001

# RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM WITNESS BOZZO)

**UPS/USPS-T14-6.** Refer to your testimony, USPS-T-14, page 13, lines 3-4, where you state that, "Furthermore, longer-term capital input decisions necessarily precede the staffing decisions they eventually affect." (a) Indicate the length of time that typically separates a decision to install a piece of equipment such as Small Parcel and Bundle Sorter ("SPBS") or FSM (Flat Sorting Machine)/1000 at a specific Management Operating Data System ("MODS") facility, and the actual installation of the piece of equipment. If the length of the interval varies, provide an upper and lower bound estimate of the length of the interval.

(b) Indicate when within the interval identified in part (a) a plant manager would typically be informed of the decision to install a new piece of equipment. If the point in time when the plant manager is informed of the decision varies, indicate the earliest point in time when he might be informed, and the latest point in time when he might be informed.

#### **RESPONSE:**

a - b. A delivery schedule is developed between the time the Board of

Governors approves the equipment purchase and the issuance of the

contract. Normally this is one to two weeks but may be longer if there is a

lengthy bidding process or extraordinary circumstances such as a capital

spending freeze. Affected plants are informed of the delivery schedule as

soon as the contract is awarded. Deliveries may be completed in as little

as 30 days (a software installation is the classic example), or as much as

three years if a large contract and a lengthy production process are

involved.

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.

Frank R. Heselton

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 December 5, 2001