

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

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA  
REDIRECTED FROM WITNESS KINGSLEY  
(NAA/USPS-T39-6-12)

The United States Postal Service hereby provides the responses to the following interrogatories of Newspaper Association of America redirected from witness Kingsley: NAA/USPS-T39-6-12, filed on November 26, 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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Chief Counsel, Ratemaking

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Joseph K. Moore

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December 10, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE  
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REDIRECTED FROM WITNESS KINGSLEY

**NAA/USPS-T39-6** Please refer to Page 28, lines 7 to 9, of your testimony. On the routes with a large proportion of centralized delivery that use a horizontal flats case, how many in-office handlings of flats are typically required?

**Response:**

Typical handlings are as follows:

- 1 – Case flats.
- 2 – Sweep flats and separate multiple streets that were cased in single separations.
- 3 – Collate in sequenced mailings.
- 4 – Collate in additional walk-sequence-saturated mailings (if necessary).
- 5 – Prepare mail to take out on route (i.e., “strapping out”).

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**NAA/USPS-T39-7** Please describe the physical dimensions, layout, and capacity of vertical flats cases.

**Response:**

Carrier cases come in three types (type "124", "143" and "144"). Vertical flats cases (VFC) are a configuration of existing carrier cases. Each type can have either four, five, or six shelves for VFC and can accommodate between 4.5 feet and 13.5 feet of flats depending on the type/shelve combination. Vertical flats cases are typically used in combinations of two to four cases. Depending on the number and type of cases used, they will require between 39 and 79 square feet of floor space for the group of cases.

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**NAA/USPS-T39-8**

How many separations do vertical flats cases contain?

**Response:**

Each shelf typically has 40 one-inch separations with one or two deliveries per separation. Therefore, a four-shelf will accommodate up to 320 possible delivery points, a five-shelf case up to 400, and a six-shelf up to 480.

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**NAA/USPS-T39-9**

How many separations do horizontal flats cases contain?

**Response:**

Shelves are moveable and arranged according to local needs, but commonly there are 24 separations, arranged four per shelf in a six shelf case.

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**NAA/USPS-T39-10**

How many addresses are served by each separation in a vertical flats case?

**Response:**

One or two addresses per separation. One address per separation is recommended if space is available.

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**NAA/USPS-T39-11**

How many addresses are served by each separation in a horizontal flats case?

**Response:**

The number of addresses per separation in a horizontal flats case is locally determined based on space, delivery points, and the number of streets or block faces. It is unlikely that more than ten percent of the delivery points would be sorted to a single separation.

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**NAA/USPS-T39-12**

Please provide the best information available regarding the average or typical number of delivery points on:

- a. Park and loop routes
- b. Curblin routes

**Response:**

- a. The average number of delivery points for park and loop 1) city routes: 475, 2) highway contract routes: 105, and 3) rural routes: 501.
- b. The average number of delivery points for curblin 1) city routes: 532, 2) highway contract routes: 195, and 3) rural routes: 440. See response to VP/USPS-10 for average number of delivery points for city routes.



## 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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