

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM
WITNESS KINGSLEY
(UPS/USPS-T39-60-65)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T39-60-65, filed on November 29, 2001. These interrogatories were redirected to the Postal Service from witness Kingsley.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM 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.

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

RESPONSE:

a. Not confirmed.

b. The list is over-inclusive. The PCN 910020, for "LSM TRAY CONVEYOR SYSTEM" is not necessarily part of the LSM. It is a tray transport system.

For instance, in the development of depreciation cost by equipment type, this cost is categorized as Tray Transport and Staging, rather than as LSM. See USPS LR-J-54, page 73.

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- c. The minimum configuration would be either the first or second items, the Multi-Position LSM or the Single-Position LSM.**

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A. 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.

(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 [sic] 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.

RESPONSE:

a. Not confirmed.

b. The list is incomplete. The addition of barcode readers to FSMs is recorded under PCN 950000. During the course of the mid-90s all FSM 881s were modified to include barcode readers, so all facilities with FSM 881s would have this equipment. Please note there are other types of equipment

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recorded under PCN 950000. To identify those PCN 950000 records which are for FSM equipment it is necessary to use the purchase contract number.

(This information is not included in the equipment records in file PPAM.xls of USPS LR-J-161 and similar files in USPS LR-J-179.)

- c. No, in addition to PCN, as is the case in part b, the purchase contract number is needed to distinguish between FSM 1000s and other FSMs. In any event, the equipment records contained in USPS LR-J-161 and USPS LR-J-179 can not readily be used to provide the number of FSM 1000s and other FSMs. As indicated in USPS LR-J-161, multiple records may exist for each piece of equipment because of upgrades and retrofits.
- d. The minimum configuration is the first item, with the PCN 920000.

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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?

(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.

RESPONSE:

a. Not confirmed.

b. PCN 960020 is not for OCRs, it is for Remote Bar Code System. Also, the addition of the ISS component to multi-line OCRs is recorded under PCN 950000. As noted in response to part b of UPS/USPS-T39-61, there are other types of equipment recorded under PCN 950000. To identify those PCN 950000 records which are for OCR equipment it is necessary to use the purchase contract number. (This information is not included in the equipment

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records in file PPAM.xls of USPS LR-J-161 and similar files in USPS LR-J-179.) The ISS has been added to all Multi-line OCRs, so most all facilities with an OCR have this equipment.

- c. As true for PCN 950000, PCN 960000 is used to record the ISS component costs (as well as other equipment). To identify those PCN 960000 records which are for OCR equipment it is necessary to use the purchase contract number. (This information is not included in the equipment records in file PPAM.xls of USPS LR-J-161 and similar files in USPS LR-J-179.) PCN 960010 is for the OCRs themselves.
- d. The minimum configuration for OCR is PCN 960010.

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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	Equipment Name
950000	BAR CODE READER
950010	SMALL BAR CODE SORTER (SBCS)
950020	DELIVERY BAR CODE SORTERS (DBCS)

(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.

RESPONSE:

a. Not confirmed.

b. The list is over-inclusive since only some of the equipment records in USPS

LR-J-161 with a PCN 950000 are for equipment used in combination with Bar

Code Sorters.

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- c. The PCN 950000 records associated with Bar Code Sorters include two types of equipment. The first is the OSS component added to the Mail Processing Bar Code Sorters (MPBCS). The Output Sub System (OSS) is described by witness Kingsley, USPS-T-39, at page 5. The second is the DBCS, which is described by witness Kingsley, USPS-T-39, at page 6.
- d. The PCN 950010 records include two types of equipment: the MPBCS and Carrier Sequence Bar Code Sorter (CSBCS). Both of these Bar Code Sorters are discussed by witness Kingsley, USPS-T-39, at page 7.
- e. See the responses to parts c and d.
- f. The minimum configuration as reflected in equipment records by PCN for MPBCS, DBCS and CSBCS is PCN 950010, PCNs 950000 and 950020, and PCN 950010 respectively. For those PCNs which include more than one type of equipment, the purchase contract number is needed to distinguish the records further. (This information is not included in the equipment records in file PPAM.xls of USPS LR-J-161 and similar files in USPS LR-J-179.)

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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.

(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	Equipment Name
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?

(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?

RESPONSE:

a. Not confirmed.

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- b. This list is over-inclusive for two reasons. First, PCN 930050 is not used in SPBS operations. Second, some of the PCN 930000 records are not for SPBS. For this PCN which includes more than one type of equipment, the purchase contract number is needed to distinguish the records further. (This information is not included in the equipment records in file PPAM.xls of USPS LR-J-161 and similar files in USPS LR-J-179.)
- c. PCN 930000 records are present at both BMCs and P&DCs.
- d. SPBS are located at both P&DCs and BMCs. In addition, records for PCN 930040 are present for both P&DCs and BMCs.
- e. PSM are described by witness Kingsley, USPS-T-39, page 21, lines 1-7.
- f. See USPS-T-39, page 22 line 26 through page 23, line 3 for a description of SPBS.
- g. We are not aware of any machine called a Small Parcel/Roll Sorter System. There are a small number of records under this PCN for both BMCs and P&DCs.

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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

RESPONSE:

In FY 2000, PCNs 970040 and 970062 are found only at BMCs. A small number of records for the rest of the PCNs (except PCN 970029 which has no records) were found for P&DCs. Most of the records for these PCNs were for BMCs.

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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