

DOCKET SECTION

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORIES OF
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
(FGFSA/USPS-T4-1-5)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the Florida Gift Fruit Shippers Association: FGFSA/USPS-T4-1-5, filed on September 16, 1997.

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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September 30, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE FGFA**

FGFA/USPS-T4-1

Provide the "standard conversion factors for each operation", which you refer to on page 19 of your testimony.

a) Provide the source and date of development for each.

Response:

See UPS/USPS-T4-1 for the conversion factors.

a. The conversion factors were implemented in 1985-1986 based on a time and motion study completed earlier.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE FGfSA**

FGfSA/USPS-T4-2

In the manual sortation of non-machinable parcels, to what extent are the productivities changed by the use of the Small Parcel and Bundle Sorter (SPBS) and the SPBS Feed System see description of those items in LR-H-10)

Response:

It is difficult to estimate to what extent productivities would be changed by processing non-machinable parcels on the SPBS as opposed to manual sortation. There are several important factors to recognize. Most of the parcels that are not within the machinability dimensions mentioned in section E620.2.5 of the DMM also cannot be processed on the SPBS, so there is not much "candidate volume" to sort on the SPBS. Moreover, even if a non-machinable parcel could be processed on an SPBS, all BMCs do not have SPBS machines and those that do have an SPBS use it primarily for the sorting of bundles as opposed to parcels. The weight, size, and shape of the parcel are also important factors which can have an impact on both mechanized and manual sorting productivities.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE FGFA**

FGFA/USPS-T4-3

To what extent is the Linear Parcel Sortation System currently in use, and what is the expected implementation of the acquisition of additional equipment? When will it be available and in use at all BMC'S?

Response:

The Linear Parcel Sortation System is currently in use at three BMCs. No additional deployments are scheduled at this time.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE FGSA**

FGFSA/USPS-T4-4

On page 20 of your testimony you refer to 'many of the packages are poorly wrapped". To what extent are these poorly wrapped parcels presented to the Postal Service by mailers using DBMC rates?

Response:

I am not aware of any data relating the quality of parcel wrapping to the source of the parcels in November and December, or at any other time, and thus cannot answer this question.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE FGFA**

FGFA/USPS-T4-5

Refer to your testimony at page 21. To what extent is the need to staff manual sorting operations to handle "late surges" to meet service commitments due to the Parcel Post mail? Is the late surge of parcel post mail deferrable to the following day, without creating an inability to meet service commitments for that mail?

Response:

My testimony on page 21 refers to "late surges" in manual operations due to rejects from automated operations. I have not observed significant "late surges" for parcels.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J Moden

Dated: 9/30/97

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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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