

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.
(PB/USPS-T29-1-16)
(June 15, 2005)

The United States Postal Service hereby files the responses of witness McCrery to the above-listed interrogatories of Pitney Bowes, Inc., which were filed on May 25, 2005.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 15, 2005

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO
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PB/USPS-T29-1. Please refer to page 11, lines 1-6 of your testimony and confirm that the Postal Service continues to want to shape First-Class Mail letters into a more efficient mail stream. If you do not confirm, please explain.

RESPONSE:

Confirmed.

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PB/USPS-T29-2. Please refer to page 11, lines 3-6 of your testimony where you state that “[b]eyond the various enhancements and new programs (e.g. PARS) previously discussed, there are only limited opportunities to increase efficiencies within letter mail processing operations through the application of proven technologies” and confirm that the “enhancements and new programs previously discussed” refer primarily to piece distribution operations. If you do not confirm, please explain.

RESPONSE:

Confirmed.

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PB/USPS-T29-3. Please refer to page 26, lines 28-30 of your testimony that states “[i]n the plants, trays are sorted manually, with the assistance of the tray handling equipment described above, or by TMS.” Please discuss the proportion of First-Class Mail letter tray sortations/handlings that are manual and unassisted with the “tray handling equipment described above,” that are manual and assisted with the “tray handling equipment described above,” and that use TMS. Please provide any supporting studies, data and reports.

RESPONSE:

There are no data systems that collect national tray volumes sorted by Low Cost Tray Sorters, through Tray Management Systems, by robotics, or manually.

Therefore, I have no basis on which to calculate exact or estimated proportions.

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PB/USPS-T29-4. Please refer to page 27, lines 25-26 of your testimony that states “[t]he automation of distribution operations places a premium on consistency and dependability in the allied operations that provide mail for piece distribution.” Please discuss with specificity if, as piece distribution operations have become increasingly automated and a smaller percentage of total mail processing costs, allied, package handling, and container handling mail processing operations have become increasingly important and a larger percentage of total mail processing costs.

RESPONSE:

I am told that allied operations (LDC 17) as a percentage of total mail processing hours (LDCs 11–14, 17, 18, 49 and 79 at MODS offices) are 32%, 31%, 33% and 36% for Base Years 1996, 1998, 2000 and 2004, respectively. The sub-functions within the various LDCs, including LDC 17, are provided in Library References K-55, J-55, I-106, and H-146 for the corresponding Base Years. Within each Library Reference, the appropriate table is Table I-2 except for H-146 where the table is not numbered, but may be found on page I-8.

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PB/USPS-T29-5. Please confirm that mailers or presort bureaus prepare certain “pallet separations” (i.e., pallets of letter trays that destinate to different local/non-local postal facilities) for First-Class Mail letters. If you confirm, please describe with specificity the value of the “pallet separations” performed by mailers or presort bureaus to the Postal Service, including a discussion of how pallet separations reduce or avoid Postal Service transportation and mail processing costs. If you do not confirm, please explain. Please confirm that the Postal Service works with mailers and presort bureaus to design “pallet separations.”

RESPONSE:

From my knowledge, it can be confirmed that some mailers and presort bureaus prepare letter trays on “pallet separations”. When trays are placed on pallets by the mailer for specific facilities/destinations, the process of sorting the trays at the origin plant can be avoided. Instead of moving the unsorted trays to a staging area, then sorting the trays using one of the methods listed in response to PB/USPS-T29-3, then moving the sorted containers to the SWYB and/or dock for dispatch; the pallets/containers prepared for specific facilities/destinations can be directed to SWYB and/or to the platform for pallet sorting and placement on outbound transportation bypassing one tray breakdown operation. Common pallet separations prepared by the mailer for First-Class Mail letters trays would be all trays transported through the local Air Mail Facility, individual destination AADCs that are transported directly out of the origin plant or through a HASP, residual

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trays transported through the HASP but requiring distribution at the HASP, and a container for the local plant. In some cases, the containers for specific facilities/destinations prepared by mailers are transported directly out of the mailer facility bypassing the pallet sort/cross-dock operation on the platform at the local plant, which in some cases may also result in the savings of one transportation leg. From my knowledge, it can be confirmed that the Postal Service works with mailers and presort bureaus to design the appropriate pallet separations based on the origin.

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PB/USPS-T29-6. If mailers or presort bureaus prepare certain “pallet separations” (i.e., pallets of letter trays that destinate to different local/non-local postal facilities) for First-Class Mail letters, please provide the following data for the letters placed on pallet separations and entered at different postal facilities than they would have been without the pallet separations (e.g., entered at local AMF versus the local P&DC).

- (a) The characteristics of the mail pieces (i.e., shape, presort level, automation, containerization, and any other relevant characteristics);
- (b) The volume of First-Class Mail single-piece letters;
- (c) The volume of First-Class Mail Bulk Metered Mail letters;
- (d) The volume of First-Class Mail nonautomation presort letters;
- (e) The volume of First-Class Mail MAADC automation letters;
- (f) The volume of First-Class Mail AADC automation letters;
- (g) The volume of First-Class Mail 3-Digit automation letters;
- (h) The volume of First-Class Mail 5-Digit automation letters;
- (i) The average number of local transportation legs avoided due to pallet separations;
- (j) The average number of platform handlings avoided due to pallet separations;
- (k) The average number of pallet breakdown activities avoided due to pallet separations; and
- (l) The average number of tray handlings avoided due to pallet separations.

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RESPONSE:

(a – h) It is my understanding that the Postal Service does not have this type of data.

(i - l) See the response to PB/USPS-T29-5.

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PB/USPS-T29-7. If mailers or presort bureaus prepare certain “pallet separations” (i.e., pallets of letter trays that destinate to different local/non-local postal facilities) for First-Class Mail letters, please provide the following data and for the letters placed on pallet separations and entered at the same postal facility they otherwise would have been entered at but the pallets and trays are now processed more efficiently (e.g., crossdock pallet in lieu of pallet breakdown and tray sortation).

- (a) The characteristics of the mail pieces (i.e., shape, presort level, automation, containerization, and any other relevant characteristics);
- (b) The volume of First-Class Mail single-piece letters;
- (c) The volume of First-Class Mail Bulk Metered Mail letters;
- (d) The volume of First-Class Mail nonautomation presort letters;
- (e) The volume of First-Class Mail MAADC automation letters;
- (f) The volume of First-Class Mail AADC automation letters;
- (g) The volume of First-Class Mail 3-Digit automation letters;
- (h) The volume of First-Class Mail 5-Digit automation letters;
- (i) The average number of local transportation legs avoided due to pallet separations;
- (j) The average number of platform handlings avoided due to pallet separations;

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- (k) The average number of pallet breakdown activities avoided due to pallet separations; and
- (l) The average number of tray handlings avoided due to pallet separations.

RESPONSE:

(a – h) It is my understanding that the Postal Service does not have this type of data.

(i - l) See the response to PB/USPS-T29-5.

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PB/USPS-T29-8. Please refer to the following generalized description of the flow of First-Class Mail single-piece letters through the Postal Service from entry to delivery.

Generalized Description of the Flow of First-Class Mail Single-Piece Letters
1. Mail collection and entry. <ul style="list-style-type: none">a. Single-piece letters are picked up by carriers, deposited in collection boxes, or dropped off at Postal Service facilities and placed in letter trays or hampers.b. Trays are loaded onto rolling stock.c. Hampers and rolling stock are staged at delivery unit.d. Hampers and rolling stock are moved and loaded onto postal vans.e. Hampers and rolling stock are transported to local plant.f. Hampers and rolling stock are unloaded off postal vans onto platform.
2. Rough cull operation. <ul style="list-style-type: none">a. Hampers and rolling stock are moved to rough cull operation.b. Rough cull operation performed (preliminary manual sortation of the mail by shape).
3. Advanced Facer Cancellor System ("AFCS") operation. <ul style="list-style-type: none">a. Trays and hampers are moved to AFCS.b. Trays and hampers are dumped on AFCS.c. Empty trays and hampers disposed.d. AFCS operation performed that faces, cancels, and culls letters into prebarcoded, OCR-readable, all other (including script) mail, and rejects.e. All other (including script) mail goes through an AFCS Input Sub System ("ISS") that captures and lifts images for the Remote Bar Coding System ("RBCS").f. Letters are swept into trays.g. Trays are loaded onto rolling stock.
4. Rolling stock is moved to staging area.
5. Outgoing Processing (outgoing RBCS, outgoing primary, and outgoing secondary schemes sort originating mail (after one or two passes) to automated distribution centers ("AADC") under the Managed Mail Program ("MMP"), SCF/3-digit, and

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to 5-digit (the local service area)).

- a. Prebarcoded letters.
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to outgoing processing operation.
 - iii. Letters are loaded onto the delivery bar code sorter ("DBCS") or mail processing bar code sorter ("MPBCS") ledge.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- b. OCR-readable letters.
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to outgoing processing operation.
 - iii. Letters are loaded onto multiline optical character reader ("MLOCR") ledge.
 - iv. Letters are inducted, sorted, and applied with a POSTNET barcode.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- c. All other (including script) letters.
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to outgoing processing operation.
 - iii. Letters are loaded onto retrofitted DBCS or MPBCS (with Output Sub System ("OSS") capability).
 - iv. Letters are inducted, sorted, and applied with a POSTNET barcode.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.

6. Rolling stock is moved to staging area.

7. Scan-Where-You-Band ("SWYB") Operation (bands and sleeves originating trays and assigns transportation)

- a. Set up operation.
- b. Rolling stock is moved to SWYB operation.
- c. Trays are sleeved.
- d. Trays are loaded onto conveyor.
- e. Trays are strapped.

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<ul style="list-style-type: none">f. Surface or air transportation is assigned and destinating and routing ("D&R") labels applied.g. Trays are loaded onto rolling stock.
8. Rolling stock (originating trays) is moved to staging area.
9. Rolling stock (originating trays) is moved and loaded onto postal vans or trucks.
10. Rolling stock is transported to local Air Mail Center ("AMC"), Hub and Spoke facility ("HASP"), or destinating AADC. <ul style="list-style-type: none">a. AMC.<ul style="list-style-type: none">i. Originating AMC.<ul style="list-style-type: none">1. Rolling stock is unloaded and staged.2. Trays are sorted into air mail containers.3. Air mail containers are loaded into outbound plane.4. Empty rolling stock is disposed.ii. Destinating AMC.<ul style="list-style-type: none">1. Air mail containers are unloaded off inbound plane and staged.2. Trays are sorted into rolling stock at destinating AMC.3. Rolling stock is moved to staging area.4. Rolling stock is moved and loaded onto postal vans or trucks.5. Rolling stock is transported to destinating plant.b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail).<ul style="list-style-type: none">i. Rolling stock is unloaded and staged.ii. Rolling stock is loaded into outbound truck.iii. Rolling stock is transported to destinating plant.
11. Rolling stock is unloaded and staged at destinating plant.
12. Tray Processing Operation or Opening Unit. <ul style="list-style-type: none">a. Tray Processing Operation (e.g., Tray Management System ("TMS")).<ul style="list-style-type: none">i. Rolling stock is moved to tray processing operation.ii. Trays are inducted and sorted.iii. Tray strapping and sleeves are removed.b. Opening Unit (e.g., bullpen operation).<ul style="list-style-type: none">i. Rolling stock is moved to bullpen.ii. Tray strapping and sleeves are removed.iii. Trays are sorted into rolling stock.
13. Incoming Processing. <ul style="list-style-type: none">a. Incoming RBCS and Incoming MMP (achieves 3-digit or 5-digit after one sort).

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- i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS or MPBCS.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- b. Incoming SCF/primary (achieves 5-digit after one sort).
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS or MPBCS.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- c. Incoming Secondaries (achieves delivery point sequence ("DPS") after two or three passes).
 - i. Set up piece distribution operation (e.g. load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS, MPBCS, or carrier sequence bar code sorter ("CSBCS").
 - iv. Letters are inducted and sorted on first pass.
 - v. Letters are swept into trays.
 - vi. Trays are moved for second pass.
 - vii. Letters are loaded onto DBCS, MPBCS, or CSBCS.
 - viii. Letters are inducted and sorted on second pass.
 - ix. Letters are swept into trays.
 - x. Trays are loaded onto rolling stock.

14. Rolling stock is moved to staging area.

15. Rolling stock is loaded onto postal van.

16. Rolling stock is transported to delivery unit.

17. Delivery Unit.

- a. Rolling stock is unloaded.
- b. Trays are sorted to carrier.
- c. Empty rolling stock is disposed.
- d. Trays are moved to platform by carrier.
- e. Trays are loaded into long-life vehicles.
- f. Letters are delivered.

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g. Empty trays are disposed.

(a) Please confirm that the generalized description is a representative, albeit simplified (e.g., does not discuss manual letter sorting operations or all the possible mail flow permutations), characterization of the flow of First-Class Mail single-piece letters through the Postal Service. If you do not confirm, please explain and produce, at a comparable level of detail, an amended generalized description that is representative of the flow of First-Class Mail single-piece letters.

(b) Please produce, at a comparable level of detail, an amended generalized description that is a representative characterization of the flow of First-Class Mail Bulk Metered Mail through the Postal Service from entry to delivery.

(c) Please produce, at a comparable level of detail, an amended generalized description that is a representative characterization of the flow of First-Class Mail Nonautomation Presort Letters through the Postal Service from entry to delivery.

(d) Please produce, at a comparable level of detail, an amended generalized description that is a representative characterization of the flow of First-Class Mail MAADC Automation Letters through the Postal Service from entry to delivery.

(e) Please produce, at a comparable level of detail, an amended generalized description that is a representative characterization of the flow of First-Class Mail AADC Automation Letters through the Postal Service from entry to delivery.

(f) Please produce, at a comparable level of detail, an amended generalized description that is a representative characterization of the flow of First-Class Mail 3-Digit Automation Letters through the Postal Service from entry to delivery.

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(g) Please produce, at a comparable level of detail, an amended generalized description that is a representative characterization of the flow of First-Class Mail 5-Digit Automation Letters through the Postal Service from entry to delivery.

RESPONSE:

(a) Generally, confirmed. Certain steps indicated in the flow(s) may be skipped due to the level of processing/handling required. For example, turnaround mail that originates and destines in the same local area will bypass the SWYB, dispatch to AMC/HASP operations, etc. In addition, certain zones are only processed up to the 5-digit level in the plant and then dispatched to the delivery unit. The final sort to the carrier is performed at the delivery unit manually.

In step 3 part (b), trays of FCM not requiring a cancellation are sent directly to the MLOCR/DIOSS machines for barcoding. Recent equipment enhancements on existing AFCS machines are changing the mail flow in part (d) as OCR technology is being deployed, which allows mail pieces to be resolved up to the 5-digit level. The new sorts on the AFCS-OCR are: FIM barcoded, outgoing, and local. The FIM barcoded mail is directed to BCS machines, while the outgoing and local mail is flowed to OSS enabled BCS machines. In part (e), it should be noted that at facilities operating in "lift-all" mode, images are lifted on all pieces except FIM barcoded mail.

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In step 5 part (b), OCR-readable letters may be directed to Delivery Barcode Sorter Input/Output Sub System (DIOSS) machines in addition to MLOCRs.

In step 7 part (d), sleeving of trays can occur prior to the SWYB operation in a separate banding operation. In part (f) “destinating and routing” is changed to “Dispatch and Routing.” Also, refer to PB/USPS-T29-10 for a description of other dispatch and transportation assignment operations.

In step 12 (a) parts ii and iii, the flow should be reordered and reworded to indicate:

- ii. Sleeves and straps are removed from trays.
- iii. Trays are inducted into TMS to be weighed, sorted, transported, and staged.

The CSBCS flow is separate and distinct from the incoming secondary operation described in step 13 part (c). This is corrected in the flows provided in response to parts (b – g) that follow.

Finally, as qualified in the question, the flow does not cover manual processing.

The flows provided in response to parts (b – g) that follow will be of a comparable level of detail and will also not cover manual processing.

(b)

Generalized Description of the Flow of Bulk Metered Mail
1) Mail collection and entry. <ul style="list-style-type: none">a. Bundles and trays of bulk metered mail are picked up by carriers/collection drivers, or dropped off at Postal

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	<p>Service facilities and placed in letter trays or hampers.</p> <ul style="list-style-type: none">b. Trays are loaded onto rolling stock.c. Hampers and rolling stock are staged at delivery unit.d. Hampers and rolling stock are moved and loaded onto postal vans.e. Hampers and rolling stock are transported to local plant.f. Hampers and rolling stock are unloaded off postal vans onto platform.g. Hampers moved to mail prep operation.
2)	Bundles of Metered mail culled from collection mail, faced and prepared (bands removed) in letter trays.
3)	Trays are directed to MLOCR/DIOSS machines for barcoding.
4)	Rolling stock is moved to staging area.
5)	<p>Outgoing Processing (outgoing RBCS, outgoing primary, and outgoing secondary schemes sort originating mail (after one or two passes) to automated distribution centers (“AADC”) under the Managed Mail Program (“MMP”), SCF/3-digit, 5-digit (the local service area)/Firm holdout).</p> <ul style="list-style-type: none">a. MLOCR/DIOSS (non-barcoded letters).<ul style="list-style-type: none">i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).ii. Rolling stock is moved to outgoing processing operation.iii. Letters are loaded onto multiline optical character reader (“MLOCR”)/DIOSS ledge.iv. Letters are inducted, sorted, and applied with a POSTNET barcode.v. Letters are swept into trays.vi. Trays are loaded onto rolling stock.b. OSS. If still non barcoded after MLOCR/DIOSS processing, letters have their images processed through the Remote Computer Reader (RCR) or Remote Encoding Center (REC) and mail pieces are sent to the OSS enabled machines.<ul style="list-style-type: none">i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).ii. Rolling stock is moved to outgoing processing operation.iii. Letters are loaded onto retrofitted DBCS or MPBCS (with Output Sub System (“OSS”) capability).iv. Letters are inducted, sorted, and applied with a POSTNET barcode.

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<ul style="list-style-type: none">v. Letters are swept into trays.vi. Trays are loaded onto rolling stock.
<ul style="list-style-type: none">6) Rolling stock (originating trays) is moved to staging area.7) Scan-Where-You-Band (“SWYB”) Operation (bands and sleeves originating trays and assigns transportation)<ul style="list-style-type: none">a. Set up operation.b. Rolling stock is moved to SWYB operation.c. Trays are sleeved.d. Trays are loaded onto conveyor.e. Trays are strapped.f. Surface or air transportation is assigned and Dispatch and Routing (“D&R”) labels applied.8) Trays are sorted by mode of transportation.9) Trays are loaded onto rolling stock.
10) Rolling stock (originating trays) is moved and loaded onto postal vans or trucks.
<ul style="list-style-type: none">11) Rolling stock is transported to local Air Mail Center (“AMC”), Hub and Spoke facility (“HASP”), or destinating AADC.<ul style="list-style-type: none">a. AMC.<ul style="list-style-type: none">i. Originating AMC.<ul style="list-style-type: none">1. Rolling stock is unloaded and staged.2. Trays are sorted into air mail containers.3. Air mail containers are loaded into outbound plane.4. Empty rolling stock is disposed.ii. Destinating AMC.<ul style="list-style-type: none">1. Air mail containers are unloaded off inbound plane and staged.2. Trays are sorted into rolling stock at destinating AMC.3. Rolling stock is moved to staging area.4. Rolling stock is moved and loaded onto postal vans or trucks.5. Rolling stock is transported to destinating plant.b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail).<ul style="list-style-type: none">i. Rolling stock is unloaded and staged.ii. Rolling stock is loaded into outbound truck.iii. Rolling stock is transported to destinating plant.
12) Rolling stock is unloaded and staged at destinating plant.
<ul style="list-style-type: none">13) Tray Processing Operation or Opening Unit.<ul style="list-style-type: none">a. Tray Processing Operation (e.g., Tray Management System (“TMS”).<ul style="list-style-type: none">i. Rolling stock is moved to tray processing

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- operation.
- ii. Tray strapping and sleeves are removed.
- iii. Trays are inducted and sorted.
- b. Opening Unit (e.g., bullpen operation).
 - i. Rolling stock is moved to bullpen.
 - ii. Tray strapping and sleeves are removed.
 - iii. Trays are sorted into rolling stock.

14) Incoming Processing.

- a. Incoming MMP (achieves 3-digit or 5-digit/Firm holdout/Carrier sort level after one sort).
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS or MPBCS.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- b. Incoming SCF/primary (achieves 5-digit/Firm holdout/Carrier sort level after one sort).
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS or MPBCS.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- c. Incoming Secondaries (achieves Firm holdout/Carrier sort level/delivery point sequence ("DPS") after one or two passes respectively).
 - i. Set up piece distribution operation (e.g. load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS, MPBCS.
 - iv. Letters are inducted and sorted on first pass.
 - v. Letters are swept into trays.
 - For DPS processing
 - vi. Trays are moved for second pass.
 - vii. Letters are loaded onto DBCS, MPBCS.
 - viii. Letters are inducted and sorted on second pass.
 - ix. Letters are swept into trays.

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x. Trays are loaded onto rolling stock.
15) Rolling stock is moved to staging area.
16) Rolling stock is loaded onto postal van.
17) Rolling stock is transported to delivery unit.
18) Delivery Unit (CSBCS Sites). <ul style="list-style-type: none"> a. Rolling stock is unloaded. b. Trays are moved to CSBCS.
19) CSBCS processing (achieves DPS from Carrier sort level after three passes if DPS sort is not performed on the DBCS/MPBCS) <ul style="list-style-type: none"> a. Set up piece distribution operation (e.g. load scheme, and retrieve/stage empty trays). b. Rolling stock is moved to CSBCS c. Letters are loaded onto CSBCS d. Letters are inducted and sorted on first pass. e. Letters are swept into trays. f. Trays are moved for second pass. g. Letters are loaded onto CSBCS h. Letters are inducted and sorted on second pass. i. Letters are swept into trays. j. Trays are moved for third pass. k. Letters are loaded onto CSBCS l. Letters are inducted and sorted on third pass. m. Letters are swept into trays. n. Trays are loaded onto rolling stock.
20) Delivery Unit <ul style="list-style-type: none"> a. Rolling stock is unloaded b. Trays are sorted to carrier. c. Empty rolling stock is disposed. d. Trays are moved to platform by carrier. e. Trays are loaded into long-life vehicles. f. Letters are delivered. g. Empty trays are disposed.

(c)

Generalized Description of the Nonautomation Presort Letter Mail.
1. Mail acceptance and entry. <ul style="list-style-type: none"> a. Nonautomation Presort letter mail is received through acceptance units (e.g. BMEU or Detached Mail Units (DMUs)) b. Mail is verified and accepted. c. Mail accepted at DMU is transported to local plant.
2. Tray Sorting - Trays are sorted manually or using tray sorters for dispatch to AMC, HASP or destinating AADC, and MAADC trays are isolated for outgoing processing.

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3. Mail accepted at DMU is transported to local plant.

4. Outgoing RBCS (MAADC nonautomation trays are processed for barcoding and sort on an outgoing Primary sort program for sort down to an AADC/SCF/Firm holdout level).

a. MLOCR/DIOSS (non-barcoded letters).

- i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
- ii. Rolling stock is moved to outgoing processing operation.
- iii. Letters are loaded onto Multi-Line Optical Character Reader ("MLOCR")/Delivery Barcode Sorter Input Output Sub System ("DIOSS") ledge.
- iv. Letters are inducted, sorted, and applied with a POSTNET barcode.
- v. Letters are swept into trays.
- vi. Rolling stock is unloaded and staged at destinating plant.

b. OSS If still non barcoded after MLOCR/DIOSS processing, letters have their images processed through the Remote Computer Reader (RCR) or Remote Encoding Center (REC) and mail pieces are sent to the OSS enabled machines.

- i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
- ii. Rolling stock is moved to outgoing processing operation.
- iii. Letters are loaded onto retrofitted DBCS or MPBCS (with Output Sub System ("OSS") capability).
- iv. Letters are inducted, sorted, and applied with a POSTNET barcode.
- v. Letters are swept into trays.
- vi. Trays are loaded onto rolling stock.

5. Scan-Where-You-Band ("SWYB") Operation (bands and sleeves originating trays and assigns transportation)

- a. Set up operation.
- b. Rolling stock is moved to SWYB operation.
- c. Trays are sleeved.
- d. Trays are loaded onto conveyor.
- e. Trays are strapped.
- f. Surface or air transportation is assigned and Dispatch and Routing ("D&R") labels applied.

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<p>g. Trays are sorted by D&R tag information to AMC, HASP or destinating AADCs.</p>
<p>6. Rolling stock (originating trays) is moved and loaded onto postal vans or trucks.</p>
<p>7. Rolling stock is transported to local Air Mail Center (“AMC”), Hub and Spoke facility (“HASP”), or destinating AADC.</p> <p>a. AMC.</p> <p>i. Originating AMC.</p> <ol style="list-style-type: none"> 1. Rolling stock is unloaded and staged. 2. Trays are sorted into air mail containers. 3. Air mail containers are loaded into outbound plane. 4. Empty rolling stock is disposed. <p>ii. Destinating AMC.</p> <ol style="list-style-type: none"> 1. Air mail containers are unloaded off inbound plane and staged. 2. Trays are sorted into rolling stock at destinating AMC. 3. Rolling stock is moved to staging area. 4. Rolling stock is moved and loaded onto postal vans or trucks. 5. Rolling stock is transported to destinating plant. <p>b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail).</p> <ol style="list-style-type: none"> i. Rolling stock is unloaded and staged. ii. Rolling stock is loaded into outbound truck. iii. Rolling stock is transported to destinating plant.
<p>8. Tray Processing Operation or Opening Unit.</p> <p>a. Tray Processing Operation (e.g., Tray Management System (“TMS”).</p> <ol style="list-style-type: none"> i. Rolling stock is moved to tray processing operation. ii. Tray strapping and sleeves are removed. iii. Trays are inducted and sorted. <p>b. Opening Unit (e.g., bullpen operation).</p> <ol style="list-style-type: none"> i. Rolling stock is moved to bullpen. ii. Tray strapping and sleeves are removed. iii. Trays are sorted into rolling stock.
<p>9. Incoming RBCS (Depending upon the Presort level, the tray is sorted at the appropriate level of processing for sortation down to the Incoming Secondary level.</p> <p>AADC: Incoming MMP 3D & 5D: Incoming Primary</p>

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- a. MLOCR/DIOSS (non-barcoded letters).
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to outgoing processing operation.
 - iii. Letters are loaded onto Multi-Line Optical Character Reader ("MLOCR")/Delivery Barcode Sorter Input Output Sub System ("DIOSS") ledge.
 - iv. Letters are inducted, sorted, and applied with a POSTNET barcode.
 - v. Letters are swept into trays.
 - vi. Rolling stock is unloaded and staged at destinating plant.
- b. OSS If still non barcoded after MLOCR/DIOSS processing, letters have their images processed through the Remote Computer Reader (RCR) or Remote Encoding Center (REC) and mail pieces are sent to the OSS enabled machines.
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to outgoing processing operation.
 - iii. Letters are loaded onto retrofitted DBCS or MPBCS (with Output Sub System ("OSS") capability).
 - iv. Letters are inducted, sorted, and applied with a POSTNET barcode.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.

10. Incoming Secondaries (achieves Carrier route/delivery point sequence ("DPS") after one or two passes respectively).

- a. Rolling stock is moved to incoming processing operation.
- b. Letters are loaded onto DBCS, MPBCS.
- c. Letters are inducted and sorted on first pass.
- d. Letters are swept into trays.

For DPS processing.

- e. Trays are moved for second pass.
- f. Letters are loaded onto DBCS, MPBCS.
- g. Letters are inducted and sorted on second pass.
- h. Letters are swept into trays.

11. Rolling stock is transported to delivery unit.

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<p>12. Delivery Unit (CSBCS sites).</p> <ul style="list-style-type: none"> a. Rolling stock is unloaded. b. Trays are moved to CSBCS.
<p>13. CSBCS processing (achieves DPS from Carrier sort level after three passes if DPS sort is not performed on the DBCS/MPBCS)</p> <ul style="list-style-type: none"> a. Set up piece distribution operation (e.g. load scheme, and retrieve/stage empty trays). b. Rolling stock is moved to CSBCS c. Letters are loaded onto CSBCS d. Letters are inducted and sorted on first pass. e. Letters are swept into trays. f. Trays are moved for second pass. g. Letters are loaded onto CSBCS h. Letters are inducted and sorted on second pass. i. Letters are swept into trays. j. Trays are moved for third pass. k. Letters are loaded onto CSBCS l. Letters are inducted and sorted on third pass. m. Letters are swept into trays. n. Trays are loaded onto rolling stock.
<p>14. Delivery Unit</p> <ul style="list-style-type: none"> a. Rolling stock is unloaded b. Trays are sorted to carrier. c. Empty rolling stock is disposed. d. Trays are moved to platform by carrier. e. Trays are loaded into long-life vehicles. f. Letters are delivered. g. Empty trays are disposed.

(d)

<p>Generalized Description of the Flow of MAADC Automation letters.</p>
<p>1. Mail acceptance and entry.</p> <ul style="list-style-type: none"> a. Mixed AADC Automation letter mail is received through acceptance units (e.g. BMEU or Detached Mail Units (DMUs)) b. Mail is verified and accepted. c. Mail accepted at DMU is transported to local plant.
<p>2. Tray Sorting</p> <p>MAADC trays are sorted from the direct trays and directed to the DBCS/MPBCS machines for outgoing processing.</p>
<p>3. Outgoing Processing (outgoing primary, and outgoing secondary schemes sort originating mail (after one or two passes) to automated distribution centers ("AADC") under the Managed Mail Program ("MMP"), SCF/3-digit, 5-digit (the local</p>

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service area) and firm holdouts).

Barcoded letters.

- a. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
- b. Rolling stock is moved to outgoing processing operation.
- c. Letters are loaded onto the delivery bar code sorter ("DBCS") or mail processing bar code sorter ("MPBCS") ledge.
- d. Letters are inducted and sorted.
- e. Letters are swept into trays.
- f. Trays are loaded onto rolling stock.

4. Rolling stock is moved to staging area.

5. Scan-Where-You-Band ("SWYB") Operation (bands and sleeves originating trays and assigns transportation)

- a. Set up operation.
- b. Rolling stock is moved to SWYB operation.
- c. Trays are sleeved.
- d. Trays are loaded onto conveyor.
- e. Trays are strapped.
- f. Surface or air transportation is assigned and Dispatch and routing ("D&R") labels applied.
- g. Trays are loaded onto rolling stock.

6. Rolling stock (originating trays) is moved to staging area.

7. Rolling stock (originating trays) is moved and loaded onto postal vans or trucks.

8. Rolling stock is transported to local Air Mail Center ("AMC"), Hub and Spoke facility ("HASP"), or destinating AADC.

- a. AMC.
 - i. Originating AMC.
 1. Rolling stock is unloaded and staged.
 2. Trays are sorted into air mail containers.
 3. Air mail containers are loaded into outbound plane.
 4. Empty rolling stock is disposed.
 - ii. Destinating AMC.
 1. Air mail containers are unloaded off inbound plane and staged.
 2. Trays are sorted into rolling stock at destinating AMC.
 3. Rolling stock is moved to staging area.
 4. Rolling stock is moved and loaded onto postal vans or trucks.
 5. Rolling stock is transported to destinating plant.

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<p>b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail).</p> <ul style="list-style-type: none">i. Rolling stock is unloaded and staged.ii. Rolling stock is loaded into outbound truck.iii. Rolling stock is transported to destinating plant.
<p>9. Rolling stock is unloaded and staged at Destinating plant.</p>
<p>10. Tray Processing Operation or Opening Unit.</p> <ul style="list-style-type: none">a. Tray Processing Operation (e.g., Tray Management System ("TMS")).<ul style="list-style-type: none">i. Rolling stock is moved to tray processing operation.ii. Tray strapping and sleeves are removed.iii. Trays are inducted and sorted.b. Opening Unit (e.g., bullpen operation).<ul style="list-style-type: none">i. Rolling stock is moved to bullpen.ii. Tray strapping and sleeves are removed.iii. Trays are sorted into rolling stock.
<p>11. Incoming Processing.</p> <ul style="list-style-type: none">a. Incoming MMP (achieves 3-digit/5-digit/Firm holdout after one sort).<ul style="list-style-type: none">i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).ii. Rolling stock is moved to incoming processing operation.iii. Letters are loaded onto DBCS or MPBCS.iv. Letters are inducted and sorted.v. Letters are swept into trays.vi. Trays are loaded onto rolling stock.b. Incoming SCF/primary (achieves 5-digit/Firm holdout/carrier sort level after one sort).<ul style="list-style-type: none">i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).ii. Rolling stock is moved to incoming processing operation.iii. Letters are loaded onto DBCS or MPBCS.iv. Letters are inducted and sorted.v. Letters are swept into trays.vi. Trays are loaded onto rolling stock.c. Incoming Secondaries (achieves Firm holdout/Carrier route/delivery point sequence ("DPS") after one or two passes).<ul style="list-style-type: none">i. Set up piece distribution operation (e.g. load scheme, print tray labels, and retrieve/stage

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<ul style="list-style-type: none">empty trays).ii. Rolling stock is moved to incoming processing operation.iii. Letters are loaded onto DBCS, MPBCS.iv. Letters are inducted and sorted on first pass.v. Letters are swept into trays.For DPS processing.vi. Trays are moved for second pass.vii. Letters are loaded onto DBCS, MPBCS.viii. Letters are inducted and sorted on second pass.ix. Letters are swept into trays.x. Trays are loaded onto rolling stock.
12. Rolling stock is moved to staging area.
13. Rolling stock is loaded onto postal van.
14. Rolling stock is transported to delivery unit.
15. Delivery Unit (CSBCS sites). <ul style="list-style-type: none">a. Rolling stock is unloaded.b. Trays are moved to CSBCS.
16. CSBCS processing (achieves DPS from Carrier sort level after three passes if DPS sort is not performed on the DBCS/MPBCS) <ul style="list-style-type: none">a. Set up piece distribution operation (e.g. load scheme, and retrieve/stage empty trays).b. Rolling stock is moved to CSBCSc. Letters are loaded onto CSBCSd. Letters are inducted and sorted on first pass.e. Letters are swept into trays.f. Trays are moved for second pass.g. Letters are loaded onto CSBCSh. Letters are inducted and sorted on second pass.i. Letters are swept into trays.j. Trays are moved for third pass.k. Letters are loaded onto CSBCSl. Letters are inducted and sorted on third pass.m. Letters are swept into trays.n. Trays are loaded onto rolling stock.
17. Delivery Unit <ul style="list-style-type: none">a. Rolling stock is unloadedb. Trays are sorted to carrier.c. Empty rolling stock is disposed.d. Trays are moved to platform by carrier.e. Trays are loaded into long-life vehicles.f. Letters are delivered.g. Empty trays are disposed.

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(e)

Generalized Description of the Flow of AADC Automation letters.
<ol style="list-style-type: none"> 1. Mail acceptance and entry. <ol style="list-style-type: none"> a. AADC Automation letter mail is received through acceptance units (e.g. BMEU or Detached Mail Units (DMUs)) b. Mail is verified and accepted. c. Mail accepted at DMU is transported to local plant.
<ol style="list-style-type: none"> 2. Tray Sorting - Trays are sorted manually or using tray sorters for dispatch to AMC, HASP or destinating AADC.
<ol style="list-style-type: none"> 3. Scan-Where-You-Band ("SWYB") Operation (assigns transportation). <ol style="list-style-type: none"> a. Set up operation. b. Rolling stock is moved to SWYB operation. c. Tray labels are scanned. d. Surface or air transportation is assigned and Dispatch and routing ("D&R") labels applied. e. Trays are sorted by D&R tag information to AMC, HASP or destinating AADCs.
<ol style="list-style-type: none"> 4. Rolling stock is transported to local Air Mail Center ("AMC"), Hub and Spoke facility ("HASP"), or destinating AADC. <ol style="list-style-type: none"> a. AMC. <ol style="list-style-type: none"> i. Originating AMC. <ol style="list-style-type: none"> 1. Rolling stock is unloaded and staged. 2. Trays are sorted into air mail containers. 3. Air mail containers are loaded into outbound plane. 4. Empty rolling stock is disposed. ii. Destinating AMC. <ol style="list-style-type: none"> 1. Air mail containers are unloaded off inbound plane and staged. 2. Trays are sorted into rolling stock at destinating AMC. 3. Rolling stock is moved to staging area. 4. Rolling stock is moved and loaded onto postal vans or trucks. 5. Rolling stock is transported to destinating plant. b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail). <ol style="list-style-type: none"> i. Rolling stock is unloaded and staged. ii. Rolling stock is loaded into outbound truck.
<ol style="list-style-type: none"> 5. Rolling stock is unloaded and staged at Destinating plant.
<ol style="list-style-type: none"> 6. Tray Processing Operation or Opening Unit. <ol style="list-style-type: none"> a. Tray Processing Operation (e.g., Tray Management

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System ("TMS").

- i. Rolling stock is moved to tray processing operation.
- ii. Tray strapping and sleeves are removed.
- iii. Trays are inducted and sorted.
- b. Opening Unit (e.g., bullpen operation).
 - i. Rolling stock is moved to bullpen.
 - ii. Tray strapping and sleeves are removed.
 - iii. Trays are sorted into rolling stock.

7. Incoming Processing.

- a. Incoming MMP (achieves 3-digit/5-digit/Firm holdout level after one sort).
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS or MPBCS.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- b. Incoming SCF/Primary (achieves 5-digit/Firm holdout/Carrier sort level after one sort).
 - i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS or MPBCS.
 - iv. Letters are inducted and sorted.
 - v. Letters are swept into trays.
 - vi. Trays are loaded onto rolling stock.
- c. Incoming Secondaries (achieves Carrier route/delivery point sequence ("DPS") after one or two passes respectively).
 - i. Set up piece distribution operation (e.g. load scheme, print tray labels, and retrieve/stage empty trays).
 - ii. Rolling stock is moved to incoming processing operation.
 - iii. Letters are loaded onto DBCS, MPBCS.
 - iv. Letters are inducted and sorted on first pass.
 - v. Letters are swept into trays.
 - For DPS.
 - vi. Trays are moved for second pass.
 - vii. Letters are loaded onto DBCS, MPBCS.

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<ul style="list-style-type: none"> viii. Letters are inducted and sorted on second pass. ix. Letters are swept into trays. x. Trays are loaded onto rolling stock.
8. Rolling stock is moved to staging area.
9. Rolling stock is loaded onto postal van.
10. Rolling stock is transported to delivery unit.
11. Delivery Unit (CSBCS sites). <ul style="list-style-type: none"> a. Rolling stock is unloaded. b. Trays are moved to CSBCS.
12. CSBCS processing (achieves DPS from Carrier sort level after three passes if DPS sort is not performed on the DBCS/MPBCS) <ul style="list-style-type: none"> a. Set up piece distribution operation (e.g. load scheme, and retrieve/stage empty trays). b. Rolling stock is moved to CSBCS c. Letters are loaded onto CSBCS d. Letters are inducted and sorted on first pass. e. Letters are swept into trays. f. Trays are moved for second pass. g. Letters are loaded onto CSBCS h. Letters are inducted and sorted on second pass. i. Letters are swept into trays. j. Trays are moved for third pass. k. Letters are loaded onto CSBCS l. Letters are inducted and sorted on third pass. m. Letters are swept into trays. n. Trays are loaded onto rolling stock.
13. Delivery Unit. <ul style="list-style-type: none"> a. Rolling stock is unloaded b. Trays are sorted to carrier. c. Empty rolling stock is disposed. d. Trays are moved to platform by carrier. e. Trays are loaded into long-life vehicles. f. Letters are delivered. g. Empty trays are disposed.

(f)

Generalized Description of the Flow of 3-Digit Automation letters.
1. Mail acceptance and entry. <ul style="list-style-type: none"> a. 3-Digit Automation letter mail is received through acceptance units (e.g. BMEU or Detached Mail Units (DMUs)). b. Mail is verified and accepted. c. Mail accepted at DMU is transported to local plant.
2. Tray Sorting - Trays are sorted manually or using tray sorters for dispatch to AMC, HASP or destinating AADC.

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3. Scan-Where-You-Band ("SWYB") Operation (assigns transportation).
- a. Set up operation.
 - b. Rolling stock is moved to SWYB operation.
 - c. Tray labels are scanned.
 - d. Surface or air transportation is assigned and Dispatch and routing ("D&R") labels applied.
 - e. Trays are sorted by D&R tag information to AMC, HASP or destinating AADCs.

4. Rolling stock is transported to local Air Mail Center ("AMC"), Hub and Spoke facility ("HASP"), or destinating AADC.
- a. AMC.
 - i. Originating AMC.
 - 1. Rolling stock is unloaded and staged.
 - 2. Trays are sorted into air mail containers.
 - 3. Air mail containers are loaded into outbound plane.
 - 4. Empty rolling stock is disposed.
 - ii. Destinating AMC.
 - 1. Air mail containers are unloaded off inbound plane and staged.
 - 2. Trays are sorted into rolling stock at destinating AMC.
 - 3. Rolling stock is moved to staging area.
 - 4. Rolling stock is moved and loaded onto postal vans or trucks.
 - 5. Rolling stock is transported to destinating plant.
 - b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail).
 - i. Rolling stock is unloaded and staged.
 - ii. Rolling stock is loaded into outbound truck.

5. Rolling stock is unloaded and staged at Destinating plant.

6. Tray Processing Operation or Opening Unit.
- a. Tray Processing Operation (e.g., Tray Management System ("TMS")).
 - i. Rolling stock is moved to tray processing operation.
 - ii. Tray strapping and sleeves are removed.
 - iii. Trays are inducted and sorted.
 - b. Opening Unit (e.g., bullpen operation).
 - i. Rolling stock is moved to bullpen.
 - ii. Tray strapping and sleeves are removed.
 - iii. Trays are sorted into rolling stock.

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| <p>7. Incoming Processing.</p> <ul style="list-style-type: none">a. Incoming SCF/Primary (achieves 5-digit/ Carrier route level after one sort).<ul style="list-style-type: none">i. Set up piece distribution operation (e.g., load scheme, print tray labels, and retrieve/stage empty trays).ii. Rolling stock is moved to incoming processing operation.iii. Letters are loaded onto DBCS or MPBCS.iv. Letters are inducted and sorted.v. Letters are swept into trays.vi. Trays are loaded onto rolling stock.b. Incoming Secondaries (achieves Carrier route/delivery point sequence (“DPS”) after one or two passes respectively).<ul style="list-style-type: none">i. Set up piece distribution operation (e.g. load scheme, print tray labels, and retrieve/stage empty trays).ii. Rolling stock is moved to incoming processing operation.iii. Letters are loaded onto DBCS, MPBCS.iv. Letters are inducted and sorted on first pass.v. Letters are swept into trays.For DPS.<ul style="list-style-type: none">vi. Trays are moved for second pass.vii. Letters are loaded onto DBCS, MPBCS.viii. Letters are inducted and sorted on second pass.ix. Letters are swept into trays.x. Trays are loaded onto rolling stock. |
| <p>8. Rolling stock is moved to staging area.</p> |
| <p>9. Rolling stock is loaded onto postal van.</p> |
| <p>10. Rolling stock is transported to delivery unit.</p> |
| <p>11. Delivery Unit (CSBCS sites).</p> <ul style="list-style-type: none">a. Rolling stock is unloaded.b. Trays are moved to CSBCS. |
| <p>12. CSBCS processing (achieves DPS from Carrier sort level after three passes if DPS sort is not performed on the DBCS/MPBCS)</p> <ul style="list-style-type: none">a. Set up piece distribution operation (e.g. load scheme, and retrieve/stage empty trays).b. Rolling stock is moved to CSBCSc. Letters are loaded onto CSBCSd. Letters are inducted and sorted on first pass.e. Letters are swept into trays.f. Trays are moved for second pass.g. Letters are loaded onto CSBCS |

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<ul style="list-style-type: none">h. Letters are inducted and sorted on second pass.i. Letters are swept into trays.j. Trays are moved for third pass.k. Letters are loaded onto CSBCSl. Letters are inducted and sorted on third pass.m. Letters are swept into trays.n. Trays are loaded onto rolling stock.
<p>13. Delivery Unit</p> <ul style="list-style-type: none">a. Rolling stock is unloadedb. Trays are sorted to carrier.c. Empty rolling stock is disposed.d. Trays are moved to platform by carrier.e. Trays are loaded into long-life vehicles.f. Letters are delivered.g. Empty trays are disposed.

(g)

<p>Generalized Description of the Flow of 5-Digit Automation letters.</p>
<p>1. Mail acceptance and entry.</p> <ul style="list-style-type: none">a. 5-Digit Automation letter mail is received through acceptance units (e.g. BMEU or Detached Mail Units (DMUs))b. Mail is verified and accepted.c. Mail accepted at DMU is transported to local plant.
<p>2. Tray Sorting - Trays are sorted manually or using tray sorters for dispatch to AMC, HASP or destinating AADC.</p>
<p>3. Scan-Where-You-Band ("SWYB") Operation (assigns transportation).</p> <ul style="list-style-type: none">a. Set up operation.b. Rolling stock is moved to SWYB operation.c. Tray labels are scanned.d. Surface or air transportation is assigned and Dispatch and routing ("D&R") labels applied.e. Trays are sorted by D&R tag information to AMC, HASP or destinating AADCs.
<p>4. Rolling stock is transported to local Air Mail Center ("AMC"), Hub and Spoke facility ("HASP"), or destinating AADC.</p> <ul style="list-style-type: none">a. AMC.<ul style="list-style-type: none">i. Originating AMC.<ul style="list-style-type: none">1. Rolling stock is unloaded and staged.2. Trays are sorted into air mail containers.3. Air mail containers are loaded into outbound plane.4. Empty rolling stock is disposed.

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<ul style="list-style-type: none">ii. Destinating AMC.<ul style="list-style-type: none">1. Air mail containers are unloaded off inbound plane and staged.2. Trays are sorted into rolling stock at destinating AMC.3. Rolling stock is moved to staging area.4. Rolling stock is moved and loaded onto postal vans or trucks.5. Rolling stock is transported to destinating plant.b. HASP (consolidation and transfer points that do not perform originating or destinating distribution operations on mail).<ul style="list-style-type: none">i. Rolling stock is unloaded and staged.ii. Rolling stock is loaded into outbound truck.iii. Rolling stock is transported to destinating plant.
<ul style="list-style-type: none">5. Tray Processing Operation or Opening Unit.<ul style="list-style-type: none">a. Tray Processing Operation (e.g., Tray Management System ("TMS")).<ul style="list-style-type: none">i. Rolling stock is moved to tray processing operation.ii. Tray strapping and sleeves are removed.iii. Trays are inducted and sorted.b. Opening Unit (e.g., bullpen operation).<ul style="list-style-type: none">i. Rolling stock is moved to bullpen.ii. Tray strapping and sleeves are removed.iii. Trays are sorted into rolling stock.
<ul style="list-style-type: none">6. Incoming Processing.<p>Incoming Secondaries (achieves Carrier route/delivery point sequence ("DPS") after one or two passes respectively).</p><ul style="list-style-type: none">a. Set up piece distribution operation (e.g. load scheme, print tray labels, and retrieve/stage empty trays).b. Rolling stock is moved to incoming processing operation.c. Letters are loaded onto DBCS, MPBCS.d. Letters are inducted and sorted on first pass.e. Letters are swept into trays.For DPS.<ul style="list-style-type: none">f. Trays are moved for second pass.g. Letters are loaded onto DBCS, MPBCS.h. Letters are inducted and sorted on second pass.i. Letters are swept into trays.j. Trays are loaded onto rolling stock.

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7. Rolling stock is moved to staging area.
8. Rolling stock is loaded onto postal van.
9. Rolling stock is transported to delivery unit.
10. Delivery Unit (CSBCS sites). a. Rolling stock is unloaded. b. Trays are moved to CSBCS.
11. CSBCS processing (achieves DPS from Carrier sort level after three passes if DPS sort is not performed on the DBCS/MPBCS) a. Set up piece distribution operation (e.g. load scheme, and retrieve/stage empty trays). b. Rolling stock is moved to CSBCS c. Letters are loaded onto CSBCS d. Letters are inducted and sorted on first pass. e. Letters are swept into trays. f. Trays are moved for second pass. g. Letters are loaded onto CSBCS h. Letters are inducted and sorted on second pass. i. Letters are swept into trays. j. Trays are moved for third pass. k. Letters are loaded onto CSBCS l. Letters are inducted and sorted on third pass. m. Letters are swept into trays. n. Trays are loaded onto rolling stock.
12. Delivery Unit a. Rolling stock is unloaded b. Trays are sorted to carrier. c. Empty rolling stock is disposed. d. Trays are moved to platform by carrier. e. Trays are loaded into long-life vehicles. f. Letters are delivered. g. Empty trays are disposed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCrery TO
INTERROGATORIES OF PITNEY BOWES, INC.**

PB/USPS-T29-9. Please describe with specificity the operations where the Postal Service removes strapping and sleeves from trays containing First-Class Mail letters. Include, but do not limit your description to, a discussion of the craft, number, and grade of employees, clocked-in MODS operation, and utilized mail transport equipment (“MTE”).

RESPONSE:

Opening unit operations 110-111 (Preferential) and 115-116 (Standard) include the work hours used for the separation of originating (outgoing) mails, excluding collection and presort operations. Operations 180-181 (Preferential) and 185-186 (Standard) include the workhours used for the separation of destinating (incoming) mails. All of these operations are used for the initial separation of letter trays, flat trays, flat bundles, newspaper bundles, sacks, parcels, and IPP/SPRs into MTE. The workload may require the dumping of sacks prior to separation, setting up the work area, moving containers of working mail into the unit, removing strapping and sleeves from trays, and staging worked containers.

To a lesser extent, strapping and sleeves may also be removed from FCM letter trays in the pouching operations. These operations, 120-121 (outgoing) and 122-123 (incoming), are used for the separation of all mail types into sacks or pouches and the dumping of sacks or containers onto a conveyor or fixed table. The working mail may arrive in containers and be worked directly out of these containers into sacks or pouches. The work content also includes setting up the work area, moving containers of working mail into the unit, removing strapping and sleeves from trays, the removal of worked sacks/pouches from racks onto MTE, and the staging of worked containers.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO
INTERROGATORIES OF PITNEY BOWES, INC.**

Both Opening Units and Pouching are staffed by Mail Handlers, Level 4, and Mail processing Clerks, Level 5. All varieties of MHE may be used.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.

PB/USPS-T29-10. Please describe with specificity the operations where the Postal Service straps and sleeves trays containing First-Class Mail letters. Include, but do not limit your description to, a discussion of the craft, number, and grade of employees, clocked-in MODS operation, and utilized mail transport equipment ("MTE").

RESPONSE:

Operations 002 (Preferential) and 003 (Standard) are for activities related to the handling of presort mail. The activities include traying, sleeving, strapping, and separation for the next handling operation which is generally 118, 208, 209, distribution or dispatch. If these activities occur as part of the next handling operation, the workhours are charged to that subsequent operation.

Operation 118 is used for ACDCS scanning of trays destined for air transport. The activities also include the preparation of manifests, application of routing labels, the loading and unloading of trays, clearing jams, changing printer applicator tape, changing strapping tape (standalone systems), or any other task related to operating ACDCS equipment.

Operation 208 is for loading, scanning, labeling, and unloading of trays, sacks, pouches, and outsides utilizing Scan-Where-You-Band (SWYB) and Semi-Automatic Scan-Where-You-Band (SASWYB) equipment. Activities include collecting MTE for use in the operation, staging and transporting containers to the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.

next handling operation, clearing jams, refilling label supply, and, provided the work is actually performed within the unit, manually sleeving and strapping trays as needed.

Operation 209 is for loading, scanning, labeling, and unloading of trays utilizing Automatic Airline Assignment (AAA) or Automatic Tray Sleeving (ATS) equipment. Activities include collecting MTE for use in the operation, staging and transporting containers to the next handling operation, clearing jams, refilling label supply, changing strapping tape, or any other task related to operating AAA or ATS equipment.

These operations are staffed by Mail Handlers, Level 4, and Mail Processing Clerks, Level 5. They tend to use the taller pieces of MHE, like an APC.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO
INTERROGATORIES OF PITNEY BOWES, INC.**

PB/USPS-T29-11. Please describe with specificity Scan-Where-You-Band (“SWYB”) operations. Include, but do not limit your description to, a discussion of the craft, number, and grade of employees, clocked-in MODS operation, and utilized mail transport equipment (“MTE”).

RESPONSE:

See my response to PB/USPS-T29-10 above.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO
INTERROGATORIES OF PITNEY BOWES, INC.**

PB/USPS-T29-12. Please describe with specificity opening units and bullpen operations that handle First-Class Mail. Include, but do not limit your description to, a discussion of the mail processing function, craft, number, and grade of employees, clocked-in MODS operation, and utilized mail transport equipment ("MTE").

RESPONSE:

See my response to PB/USPS-T29-9 above.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.

PB/USPS-T29-13. Please confirm that “pallet separations” (i.e., pallets of First-Class Mail letter trays that destinate to different local/non-local postal facilities) prepared by mailers at the request of the Postal Service allow the Postal Service to either transport the pallets directly to the final local facility (e.g., local plant, air mail center, hub and spoke facility, or mail consolidation center), typically avoiding platform and other mail processing operations at an intermediate local facility, or crossdock the mail at an intermediate local facility, typically avoiding entering, staging, and breaking down the pallet, sorting the trays into rolling stock, and staging and loading the rolling stock at the intermediate local facility. If you do not confirm, please explain.

RESPONSE:

Confirmed. However, it is worth noting that the preparation of these separations is not always at the request of the Postal Service. In many cases, the separations are part of an agreement that provides later acceptance times. The mailer desires later acceptance times, which in most cases, can only be granted when the mailer prepares these “pallet separations” allowing time-consuming operational steps to be bypassed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.

PB/USPS-T29-14. Please confirm that a higher proportion of 5-digit automation letters than of MAADC automation letters are prepared on “pallet separations” (i.e., pallets of First-Class Mail letter trays prepared by mailers at the request of the Postal Service that destinate to different local/non-local postal facilities). If you do not confirm, please explain.

RESPONSE:

As noted in response to PB/USPS-T29-6, parts a – h, it is my understanding that the Postal Service does not have any data on which a confirmation of this statement could be based. Depending on separations prepared by the mailer, a Mixed AADC letter tray could be prepared on a pallet separation for the plant responsible for outgoing processing, while a 5-digit automation letter tray could be placed one of several pallet separations (e.g. HASP, AMC, destinating AADC etc.).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.

PB/USPS-T29-15. Please confirm that, for presorted First-Class Mail letters, opening unit activities include, among others, breaking down rolling stock or pallets, sorting trays to rolling stock, and removing tray sleeves and strapping. If you do not confirm, please explain, discuss the opening unit activities, and discuss the operations for presorted First-Class Mail letters where the Postal Service breaks down rolling stock and pallets, sorts trays to rolling stock, and removes tray sleeves and strapping.

RESPONSE:

Confirmed, but see also my discussion of Pouching and Presort in PB/USPS-T29-9 and PB/USPS-T29-10, respectively, above.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY TO INTERROGATORIES OF PITNEY BOWES, INC.

PB/USPS-T29-16. Please refer to USPS witness Eggleston's response to CSA/USPS-T26-24 in Docket No. R2000-1, Tr. 13/5128-29 where she states that "[t]he IOCS handling tallies record the mail actually being handled by the employees recorded as working a given mail processing operations (cost pool), rather than the mail expected to be handled in a given operation."

(a) Please confirm that the Postal Service does infrequently handle letter-shaped mail in non-letter operations. If you do not confirm, please explain.

(b) Please confirm that Postal Service clerks and mail handlers do infrequently work in operations that are different than the operation into which they are clocked. If you do not confirm, please explain.

(c) Please confirm that either of these possibilities could result in a non-zero cost for First-Class Mail letters in a non-letter cost pool. If you do not confirm, please explain.

RESPONSE:

(a) Confirmed

(b) Confirmed

(c) Confirmed

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.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.

Washington, D.C. 20260-1137

June 15, 2005