

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MOTION FOR LATE ACCEPTANCE OF
AND RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-16-17)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS-16-17, filed on August 20, 1997. Each interrogatory is stated verbatim and is followed by the response.

The Postal Service moves that these response be accepted out of time. It was recently brought to our attention that these responses had not been filed; we therefore cannot identify a specific cause of the delay, which we regret. Inasmuch, however, as the questions were directed to the Postal Service institutionally, and the asking party did not inquire about their status until quite recently, no party should have been prejudiced by the unfortunate delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 28, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-16. Please refer to your responses to UPS/USPS-T15-5 and UPS/USPS-T15-6 (redirected from witness Patelunas).

- (a) How and to what extent has the use of postal packs affected the costs associated with moving empty equipment?
- (b) To what extent are postal packs used for sacks and trays?

Response:

a. Although we have not studied the extent of which postal packs have affected the costs associated with moving empty equipment, transportation costs have been impacted since postal packs, like other types of empty equipment, are periodically repositioned back to heavy origin locations.

b. Postal packs are commonly used to transport sacks and trays since these items are processed on the sack sorters and are sorted into postal packs. However, we are unable to provide an estimate of what extent postal packs are used for sacks and trays.

Also, not all of the trays that are processed at the BMC are processed on the sack sorter.

RESPONSE OF UNITED STATES POSTAL SERVICE
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UPS/USPS-17. Please refer to your response to UPS/USPS-T15-7 (redirected from witness Patelunas), where you state, "Cost savings are expected from IMHS as a result of increased containerized loads. IMHS consists primarily of mechanized pallet loaders and unloaders, transport equipment, and other equipment (e.g. forklifts) applicable to the movement of pallets and containerized loads."

- (a) Please explain what "containerized" means, i.e., what type(s) of containers are used?
- (b) Please provide a list of the type(s) of transport equipment included in IMHS.
- (c) In addition to forklifts, please provide a list of the "other equipment" included in IMHS.

Response:

- a. The term "containerized" refers to the preparation of mail volumes into containers, that are conducive to loading/unloading and/or moving large volumes of mail, in lieu of handling the volumes individually. For instance, sacks can be unloaded from trucks more efficiently when they are containerized in postal packs instead of bed loaded on a truck, since each sack does not have to be unloaded individually. Generally, these containers are pallet based and come in various sizes and configurations. The most commonly used containers are: pallets, pallet boxes, gaylords, Westpaks, and postal packs.
- b. The primary pieces of transport equipment used in IMHS are forklifts. Manual pallet jacks are also used in some facilities -- specifically, smaller plants -- to move pallets.
- c. In addition to forklifts, IMHS also consists of automatic container loaders and/or unloaders for sacks and/or parcels. Also, as mentioned in the response to UPS/USPS-T15-7, IMHS is a mail handling program. With that in mind, there have also been other system enhancements to support the program. For instance, as part of IMHS, sack sorters at the BMCs received a modification that permits them to read barcoded container labels.

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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