

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS COOMBS
TO INTERROGATORIES OF AMAZON.COM (AMZ/USPS-T44-1 – 6)
(July 11, 2006)

The United States Postal Service hereby provides the response of witness
Coombs to the following interrogatories of Amazon.com, filed on June 27, 2006:

AMZ/USPS-T44-1 – 6.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 11, 2006

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AMZ/USPS-T44-1.

- a. In the current operating environment, please explain the various steps involved in receiving BPM, Media Mail and other parcels at DDUs, and distributing them to carriers.
- b. In the current operating environment, please explain the various steps that carriers go through to prepare BPM, Media Mail and other parcels for delivery.
- c. After the Flat Sequencing System ("FSS") is fully deployed, please explain how BPM, Media Mail and other parcels will be handled at DDUs, and explain any changes that are anticipated with respect to the way that parcels are handled.
- d. Do any DDUs receive parcels already presorted to individual carriers, or must parcels always be sorted to carrier route upon arrival at the DDU?
- e. Do any DDUs have a Small Parcel and Bundle Sorter ("SPBS"), or any other equipment, for sorting parcels to individual carrier route?

RESPONSE:

- a. Parcel-shaped mail is generally received at the DDU in All Purpose Containers (APCs) or in sacks from the mail processing facility. The parcel-shaped pieces are distributed by the clerk at the DDU to the carrier's case or parcel hamper for delivery.
- b. Carriers receive parcel-shaped pieces at their case or in their hamper. If the piece is small enough to fit in the carrier's satchel or cart, the carrier will usually place the piece, in the proper delivery order, with the residual mail bundle for distribution. If the piece is too large for the satchel or the cart, the carrier will sequence the parcels during the loading process at the vehicle so that they are easily accessible for delivery at the correct delivery point.
- c. The data from the Flat Sequencing System (FSS) test has not yet been analyzed so no information is available.

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- d. Carriers sometimes receive parcel-shaped pieces in sacks from the mail processing facility that are already sorted by carrier route and are distributed by the clerk directly to the carrier's hamper.

- e. I am not aware of any DDU that has a Small Parcel and Bundle Sorter at the unit unless the DDU is located in the same building as the mail processing operation. Even in that case, the DDU is located in a distinct part of the facility away from the mail processing operations. DDUs do not have parcel sorting equipment for distributing parcels by individual carrier route.

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AMZ/USPS-T44-2.

- a. With respect to the way that parcels are handled within DDUs, please explain which steps are the most time-consuming (and costly).
- b. Please explain what particular features of parcels, or what types of parcels, require a disproportionate amount of time (and cost) to handle at DDUs.

RESPONSE:

- a. I am not aware of any time and motion studies that have been conducted that would identify the most time-consuming or costly steps in the parcel distribution operation.
- b. To my knowledge, no study has been conducted that collects data that would provide this information.

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AMZ/USPS-T44-3.

- a. Mailboxes (curbline, apartment house, and clusterboxes) come in various sizes. Of the major types of mailboxes in common use, which have the most restrictive dimensions with respect to delivery of parcels?
- b. Vis-a-vis delivery of parcels, what are the limiting dimensions of the most restrictive mailboxes?

RESPONSE:

- a. No study has been conducted that defines the answer to this question. However, generally speaking, apartment house mail receptacles and older door slots have the smallest and most restrictive mail dimensions.
- b. The smaller the mail receptacle, the more limiting the receptacle becomes for mail delivery in general. Smaller door slots and top-loading wall mounted receptacles have very limiting dimensions. The actual dimensions specified for door slots are 1 ½ inches tall and 7 inches long. For vertical and horizontal central mail receptacles, the dimensions are 4-7/8" x 5-7/8" x 14-7/8".

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AMZ/USPS-T44-4.

Please refer to your testimony at page 14, line 6, through page 16, line 10, and explain how the handling of parcels differs from the handling of rigid flats as described there.

RESPONSE:

The handling of parcel-shaped pieces is generally a much more comprehensible process. A carrier can deduce from the size and shape of a parcel, and from their experience, whether to include the item for delivery with the letter and flat-shaped pieces or whether the item must be delivered separately in the parcel stream. The delivery of rigid pieces is sometimes not that transparent. For example, the rigid item looks as if it will easily fit in an apartment mail receptacle. When the carrier attempts to place it in the receptacle, the item is slightly too wide or slightly too long to fit because of the location of the rigid portion of the item, perhaps depending on whatever else is being delivered on that day.

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AMZ/USPS-T44-5.

- a. When a curblin carrier has a parcel for delivery that is too large to fit within the mailbox, does the carrier dismount and attempt to deliver the parcel to the door, or does the carrier simply leave a notice of attempted delivery in the mailbox? Please explain.
- b. Please explain how carriers on foot routes handle parcels, especially parcels that are too large to fit within the mailbox.
- c. Please explain how carriers on park-and-loop routes handle parcels.

RESPONSE:

- a. The carrier is required to dismount and attempt the delivery of parcels on a curblin route when someone is available to receive delivery. A PS Form 3849 is left if no one is available to receive the parcel.
- b. On foot routes, carriers will carry parcels in their satchel or cart and deliver those parcels along with the rest of the mail when they get to the delivery point if the parcel is of the size and weight to fit in the satchel or cart. For parcels that are too large or too heavy to carry in a satchel or cart, carriers assigned to Parcel Post or Combination Routes will deliver the parcel for these foot routes.
- c. On park and loop routes, carriers will carry parcels that are of the size and weight to fit in the satchel or cart and deliver those parcels along with the rest of the mail when they reach the delivery point. For parcels that are too large or heavy to carry in a satchel or cart, two techniques could be used. If the carrier knows that the customer is usually home, the carrier will begin the loop at the point of the parcel delivery rather than the normal park point, or the carrier will bypass the stop until the loop is complete and then drive to the delivery point with both the mail and the parcel.

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AMZ/USPS-T44-6.

Please describe any changes that the Postal Service contemplates implementing to increase the efficiency, and reduce the cost, of delivering parcels.

RESPONSE:

The Postal Service is constantly working on methods that reduce costs and improve service to its customers. I am aware of no current initiatives that are specifically designed to reduce the costs of delivering parcels.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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