

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

AMAZON.COM, INC.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS MARC D. MCCRERY (AMZ/USPS-T42-5-9)
(July 13, 2006)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Amazon.com, Inc. hereby submits interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

William J. Olson
John S. Miles
Jeremiah L. Morgan
WILLIAM J. OLSON, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3860
(703) 356-5070

Counsel for Amazon.com, Inc.

AMZ/USPS-T42-5.

Please refer to your responses to AMZ/USPS-T42-1(b) and AMZ/USPS-T42-2(c), where you state that the Singulate, Scan, Induction Unit (“SSIU”) is and will be one of the primary pieces of equipment used to process machinable BPM and Media Mail at BMCs.

- a. How many separations are the SSIUs capable of achieving?
- b. What is the throughput of the SSIU?
- c. What is the productivity of the SSIU?

AMZ/USPS-T42-6.

Your responses to AMZ/USPS-T42-2(b) and 2(c) appear to state that Automated Package Processing System (“APPS”) machines will not be used to process machineable BPM and Media Mail at BMCs. Please explain why the 14 APPS machines currently deployed to BMCs are not, and will not be, used to process machinable BPM and Media Mail.

AMZ/USPS-T42-7.

Please provide in a format that can be compared both the (i) productivities and (ii) unit cost of sorting small parcels (*e.g.*, BPM and Media Mail parcels) on (a) Parcel Sorter Machines (“PSMs”), (b) SSIUs, (c) Small Parcel and Bundle Sorters (“SPBSs”), and (d) APPSs.

AMZ/USPS-T42-8.

Your response to AMZ/USPS-T42-1(f) states that parcels for certain lower-volume 5-digit destinations are massed together and sent from the BMC to the plant for further separation.

- a. After such parcels arrive at the plant, is the further separation to 5-digit destinations achieved on mechanized sorting equipment, or manually?
- b. Please describe the handling process for parcels at plants.

AMZ/USPS-T42-9.

Please refer to your responses to AMZ/USPS-T42-2(c) and AMZ/USPS-T42-4(d) which appear to state, respectively, that:

- “even under a realigned network,” APPS will **not** be used to sort machinable BPM or Media Mail; [Response to AMZ/USPS-T42-2(b) and (c).]
 - “by centralizing the processing of small parcels [under network realignment] more will be processed on APPS rather than on less productive SPBS or manual operations.” [Response to AMZ/USPS-T42-4(d).]
- a. Please explain why the more productive APPS machine will not be used to sort BPM and Media Mail parcels after the first 76 APPS machines are deployed.
 - b. If the more productive APPS machines will not be used to process BPM and Media Mail parcels, what efficiencies does network realignment offer to parcels in BPM and Media Mail?

- c. Does network realignment envision any automated or mechanized sortation of small parcels to carrier route (*e.g.*, in those 5-digit destinations that receive a higher volume of parcels)?