

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 ADVO (ADVO/USPS-T44-1 - 3, 6 - 8)  
(July 26, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of Advo, filed on July 12, 2006: Advo/USPS-T44-1 - 3, 6 - 8. Questions 4 and 5 have been redirected to witness McCrery (T-42).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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July 26, 2006

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF ADVO INC.**

**ADVO/USPS-T44-1.**

With respect to the plans for FSS and its potential for route restructuring, has the USPS considered any new flat containers or any new carrier containers or vehicles?

**RESPONSE:**

The data from the testing of FSS has not been analyzed, and no information is currently available. However, it is generally believed that FSS will require some equipment modifications.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF ADVO INC.**

**ADVO/USPS-T44-2.**

On page 8, you state that: "The FSS mail bundles will be picked up in the FSS staging area and taken directly to the street just as DPS letters are currently handled."

- a. With respect to FSS mail bundles, will the FSS or allied labor actually bundle and somehow tie out FSS processed mail? Please explain.
- b. Will the staging area at the DDU generally be on the dock or just inside the dock door? Or will there be some other area generally designated to be the staging area? Please explain.

**RESPONSE:**

a., b. The data from the testing of FSS has not been analyzed, and no information is currently available. This decision will be determined when the data is fully analyzed.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
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**ADVO/USPS-T44-3.**

Please identify the types of containers that carriers generally use to move mail from their cases to their vehicles and explain why they are used. If this varies by type or shape of mail, please explain. If carriers use containers within containers (e.g., trays within hampers), please also explain those arrangements.

**RESPONSE:**

Carriers generally use canvas hampers (or modified hampers) to move their mail from their case to the vehicle. Within the hamper, the carrier will generally have “trayed” residual letters and flats and DPS letters. Saturation flat-shaped piece bundles and parcels are also in the hamper.

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INTERROGATORIES OF ADVO INC.**

**ADVO/USPS-T44-6.**

On page 8, you state:

“It is currently projected that the majority of all Standard Mail flat-shaped pieces will be processed using FSS once it is implemented, with the possible exception of saturation flats. Periodicals and First Class Mail flat-shaped pieces will also be processed utilizing FSS, but they will be impacted to a lesser degree because of service standards, particularly for First-Class Mail.”

Please explain this statement—i.e., to what degree do you believe that Standard Mail flat-shaped pieces will be impacted by FSS?

**RESPONSE:**

As I have stated previously, the data from testing FSS has not been analyzed and the information is not available. However, it is generally believed that the majority of all Standard Mail flat-shaped pieces will eventually be processed with FSS. Periodicals and First Class Mail flat-shaped pieces have different service standards. It is generally believed that FSS will be utilized for these flat-shaped pieces as well as long as the operational window and service standards permit.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF ADVO INC.**

**ADVO/USPS-T44-7.**

Once FSS is implemented,

- a. At what processing point will Standard mail flats be combined with First Class/Periodicals/Package Service flats? Please explain fully.
- b. At what point will the processing of Standard mail flats at the plan be halted in the event that some of those flats need to be deferred as a result of a carrier supervisor decision? Please explain fully.

**RESPONSE:**

The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF ADVO INC.**

**ADVO/USPS-T44-8.**

On pages 8 and 9, you explain that FSS will save considerable amount of in-office time but may impact street time. If the USPS has quantified the extent of the impact on in-office and/or street time, please provide that information. If it has not quantified the extent of that impact, please explain why.

**RESPONSE:**

The Postal Service has not yet quantified the impact because the data from the FSS test has not been analyzed and the information is not currently available.

## 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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