

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MCCRERY
(UPS/USPS-T42-1 and 2)
(July 13, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness

McCrery: UPS/USPS-T42-1 and 2.

Respectfully submitted,

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UPS/USPS-T42-1. Refer to USPS-T-42, page 6, where you state that there are over 5,200 Delivery Barcode Sorters deployed across the Postal Service network.

(a) Refer to the facility classification employed by Witness Van-Ty-Smith, USPS-T-11, page 3, in which she divides facilities into BMCs, MODS offices, and non-MODS offices. Approximately how many of the 5,200 DBCS machines that you refer to are located in each of these three types of facilities?

(b) How many DBCS machines will be located in a typical MODS facility?

(c) What is the minimum number of DBCS machines that will be located in a MODS facility?

(d) What is the maximum number of DBCS machines that will be located in a MODS facility?

(e) For those instances in which a MODS facility is equipped with multiple DBCS machines, discuss in detail how the workload will typically be divided across these machines. Will they operate simultaneously? What sortation activities will be carried out in parallel?

(f) What factors determine the number of DBCS machines that will be installed at a particular MODS facility?

(g) Are decisions ever made to increase the number of DBCS machines installed at a MODS facility? If so, what changes in circumstances will trigger the decision to install additional machines?

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(h) Are decisions ever made to decrease the number of DBCS machines installed at a MODS facility? If so, what changes in circumstances will trigger the decision to remove machines?

UPS/USPS-T42-2. Refer to USPS-T-42, page 21, where you state that periodicals are sometimes sorted manually in order to avoid service failure. Describe in detail the operational conditions that create a risk of this type of service failure and trigger a decision to rely on manual sortation.