

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS McCRERY
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-T42-1(b)-(h)-2)
(July 27, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-listed interrogatories of United Parcel Service, filed on July 13, 2006. The response to UPS/USPS-T42-1(a) is forthcoming.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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?

(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?

Response:

a. The response is forthcoming.

b. See VP/USPS-T42-3.

c. One.

d. There is no preset maximum. See VP/USPS-T42-3.

e. Workload consists of a volume of letters that must be sorted in a specific manner, called a sort plan or scheme, in a time interval defined by when the mail is available for sorting, when the DBCS machines become available, and when the volume of mail must be completely sorted according to that sort plan. DBCSs will operate simultaneously to the extent that the workload

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requires multiple machines. Typically, outgoing sorts will run simultaneously on multiple machines, but they may not be the same sort plan. For example, if the facility has exactly two DBCS, each with a different number of sort stackers, then each DBCS would run a different outgoing primary sort plan. Furthermore, one may be operating in a barcode sorting mode (e.g., FIM mail) and the other in an ISS (image capture) mode. Incoming primary and SCF schemes may also require multiple machines, although not as commonly as outgoing primary. Conversely, it would be quite unusual to see the same incoming secondary sort plan running on two different machines. It is important to distinguish between the type of sort plan and the individual plans. For example, in the early morning (e.g., 3 am to 6 am) most or all DBCSs would commonly be running incoming secondary volume (including DPS), but it would be quite unusual to see the same incoming secondary sort plan on two different machines.

- f. Workload and available floor space.
- g. Changes in workload or available floor space can trigger a decision to increase the number of DBCSs in a facility.
- h. Changes in workload or available floor space can trigger a decision to decrease the number of DBCSs in a facility.

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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.

Response:

See response to TW/USPS-T20-9.