

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 THE NATIONAL NEWSPAPER ASSOCIATION  
(NNA/USPS-T42-1-4)  
(July 28, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-listed interrogatories of the National Newspaper Association, filed on July 14, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**NNA/USPS-T42-1** Please refer to your testimony on p. 19 where you state:  
"More commonly, small volumes of flats for a particular destination are processed manually when the volume is insufficient to justify the fixed costs of setting-up and sweeping a scheme for such a small volume. "

- a. Do operations guidelines or procedures set minimum volume standards for the use of UFSM 1000s? If so, please provide a copy. If not, please explain why.
- b. If your response to part a. is no, do plant managers have sole discretion in the decision to use the UFSM 1000 or to move mail to manual sorting?
- c. Are you aware of circumstances where manual sorting is opted for in plants for purposes of occupying workers who otherwise have no work to do? If your response is yes, are these practices approved by the Postal Service?

**Response:**

- (a) There are no management instructions containing guidelines or procedures for the use of UFSM 1000s in regards to minimum volume standards. In practice, sites need a minimum volume of approximately 5,000 pieces per hour to consider operating in the automation mode. From my experience, it should be noted that site-specific circumstances may necessitate the use of UFSM 1000 equipment with a fewer number of pieces (e.g., lack of manual cases, manual distribution clerks, in particular, scheme qualified clerks, etc.).
- (b) Supervisors of the flat sorting operation can make the decision to utilize the UFSM 1000 to sort mail when it is feasible to do so. Plant managers, however, have the ultimate responsibility for the overall plant operation.
- (c) No, I am not aware of any circumstances where manual sorting is opted for in plants in order to keep workers occupied.

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**NNA/USPS T42-2** Please refer to the description of the elimination of "skin sacks" described in LR-L-49.

- a. Please confirm that on May 11, 2006, the Postal Service required periodicals sacks to contain 24 pieces or more.
- b. If you confirm, please state whether the Postal Service permits any exceptions to this rule, and if so, under what circumstances.
- c. Do you believe that by the test year, skin sacks will have been eliminated? If your response is no, please state what percentage you believe will have been eliminated and explain why the percentage is less than 100.

**Response:**

a – b. Confirmed. At this time, no exceptions have been allowed except for those identified in the Federal Register final rule. These include mailings where we currently allow mailers to balance bundles for a presort destination within sacks to avoid preparation of very heavy sacks, provided the volume to the presort destination meets the required minimum. Use of exceptional dispatch and the option to prepared bundles outside of sacks are also allowed (see NNA/USPS-T42-3).

c. Yes, they should be eliminated, with the exceptions mentioned in subpart (b).

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**NNA/USPS T42-3.** Please confirm that the Postal Service announced in 2005 that periodicals mailers would be permitted to enter unsacked bundles at Destination Facilities and provide copies of all public announcements and guidance to destination units relevant to this guidance.

**Response:**

Not confirmed. The entry of unsacked bundles of Periodicals mail was limited to entry at a Destination Delivery Unit, not all "Destination Facilities". The changes to the standards were published in Postal Bulletin 22138, September 30, 2004, pages 10-11. The article specifically directs postal employees with questions about the preparation option to contact their district manager of business mail entry. An article about the preparation option was published in Mailers Companion in the September/October 2004 issue. It can be found at <http://www.usps.com/mailerscompanion/welcome.htm>.

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**NNA/USPS T42-4.** If you confirmed NNA/USPS T42-4,

- a. Please describe the practices you believe mailers have followed in entering unsacked bundles and, in particular, whether this practice occurs in both Periodicals subclasses;
- b. Please confirm that in some circumstances, bundles may not be placed in any container at all, but may be carried manually to a carrier or other postal worker for casing. If you do not confirm, please explain your response fully.
- c. In circumstances where an unsacked bundle is entered at a destination facility and is deposited in a container designated by the Postal Service, please describe the containers that you would expect to be used and explain how they are used.
- d. Please describe the status of the development of the practice of entering unsacked bundles. For example, do you believe it is in early stages, well-developed or nearly matured within the postal system. Please fully explain your response.

**Response:**

- a. I have heard that mailers are depositing unsacked bundles with the driver unloading then placing the bundles at a location or into a container specified by the local delivery unit. Yes, the practice occurs in both subclasses.
- b. Confirmed. Based on equipment availability and the physical characteristics of the building, it is possible that the bundles might be unloaded directly onto the dock and then walked inside by a postal employee for distribution to carriers or a manual distribution case.
- c. Likely equipment would be hampers, general purpose mail containers, and utility carts, dependant on volume. The container will then be moved to an operation in which the bundles will be distributed to the carrier cases.
- d. I believe it is in the early stages, with potential to expand as more mailers participate.