

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 McCRERY
TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T42-1(a))
(July 31, 2006)

The United States Postal Service hereby provides the response of witness McCrery to the above-listed interrogatory of United Parcel Service, filed on July 13, 2006.

The 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

Sheela A. Portonovo

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3012, FAX -6187

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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 DBSC 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.

	DBCS	DIOSS	CIOSS
MODS	92.57%	96.46%	100.00%
Non MODS	7.43%	3.54%	0.00%
BMC	0.00%	0.00%	0.00%

b-h. See witness McCrery's response filed on July 27, 2006.