

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

AMAZON.COM, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOYCE K. COOMBS (AMZ/USPS-T44-1-6)
(June 27, 2006)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Amazon.com, Inc. hereby submits interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

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AMZ/USPS-T44-1.

- a. In the current operating environment, please explain the various steps involved in receiving BPM, Media Mail and other parcels at DDUs, and distributing them to carriers.
- b. In the current operating environment, please explain the various steps that carriers go through to prepare BPM, Media Mail and other parcels for delivery.
- c. After the Flat Sequencing System (“FSS”) is fully deployed, please explain how BPM, Media Mail and other parcels will be handled at DDUs, and explain any changes that are anticipated with respect to the way that parcels are handled.
- d. Do any DDUs receive parcels already presorted to individual carriers, or must parcels always be sorted to carrier route upon arrival at the DDU?
- e. Do any DDUs have a Small Parcel and Bundle Sorter (“SPBS”), or any other equipment, for sorting parcels to individual carrier route?

AMZ/USPS-T44-2.

- a. With respect to the way that parcels are handled within DDUs, please explain which steps are the most time-consuming (and costly).
- b. Please explain what particular features of parcels, or what types of parcels, require a disproportionate amount of time (and cost) to handle at DDUs.

AMZ/USPS-T44-3.

- a. Mailboxes (curbline, apartment house, and clusterboxes) come in various sizes. Of the major types of mailboxes in common use, which have the most restrictive dimensions with respect to delivery of parcels?
- b. Vis-a-vis delivery of parcels, what are the limiting dimensions of the most restrictive mailboxes?

AMZ/USPS-T44-4.

Please refer to your testimony at page 14, line 6, through page 16, line 10, and explain how the handling of parcels differs from the handling of rigid flats as described there.

AMZ/USPS-T44-5.

- a. When a curbline carrier has a parcel for delivery that is too large to fit within the mailbox, does the carrier dismount and attempt to deliver the parcel to the door, or does the carrier simply leave a notice of attempted delivery in the mailbox? Please explain.
- b. Please explain how carriers on foot routes handle parcels, especially parcels that are too large to fit within the mailbox.
- c. Please explain how carriers on park-and-loop routes handle parcels.

AMZ/USPS-T44-6.

Please describe any changes that the Postal Service contemplates implementing to increase the efficiency, and reduce the cost, of delivering parcels.