

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**MOTION OF UNITED PARCEL SERVICE TO CORRECT TRANSCRIPT
(September 6, 2006)**

Pursuant to Presiding Officer's Ruling No. R2006-1/47 (August 15, 2006), UPS hereby moves that the transcript in this case be corrected to add to the record the following interrogatory responses which were designated as written cross-examination by UPS but were not included in the transcript:

Volume 11 (August 17, 2006)

UPS/USPS-T42-1(a).

Volume 13 (August 22, 2006)

UPS/USPS-T37-6 (redirected to witness Coombs from witness Kiefer).

Copies of these interrogatory responses are attached for the convenience of the Commission.

Respectfully submitted,

John E. McKeever
Phillip E. Wilson, Jr.
Laura A. Biancke
Attorneys for United Parcel Service

DLA Piper US LLP
One Liberty Place
1650 Market Street. Suite 4900
Philadelphia, PA 19103-7300
(215) 656-3310
(215) 656-3301 (FAX)

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.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORY OF UPS,
REDIRECTED FROM WITNESS KIEFER (USPS-T-37)**

UPS/USPS-T-37-6

Describe in detail all differences in the processing and delivery of Priority Mail pieces and Parcel Post pieces upon reaching the DDU.

RESPONSE:

Priority Mail that consists of flat-shaped pieces is received at the DDU in the same mail stream as First Class flat-shaped pieces and is handled and delivered with the same urgency as the First Class letter-shaped and flat-shaped pieces.

This mail is received in the dispatch of value and is always disseminated and delivered on the day that it reaches the DDU in order to make the Priority Mail service commitment.

Priority Mail that consists of parcel-shaped pieces is generally received at the unit from the processing facility in isolated All Purpose Containers (APCs). It is immediately processed by the clerks in the DDU, and distributed for delivery to the carrier's case or loading hamper on the day that it is received, in order to make the Priority Mail service commitment. The unique markings of Priority Mail assist the DDU personnel in identifying and processing the pieces for immediate delivery, which has contributed to service level achievements.

Parcel Post pieces are received from the processing facility in APCs or parcel sacks at the DDU and, depending on operational resources, are distributed for delivery by the clerks at the DDU into the carrier's loading hamper.