

these mail types will provide the most relief to the BMCs without extending Postal Service pallet-handling resources beyond supportable limits.

The initial proposal to require that all trays on BMC pallets and working pallets must be strapped, regardless of where the pallets are deposited, remains unchanged. Mailers will not be required to strap trays placed on pallets made up to finer levels of sortation. This option will provide an inducement to mailers to prepare pallets to the finest depth of sort, allowing for greater cross-dock opportunities at the BMCs and providing relief for BMC operations heavily affected by unstrapped trays.

The requirement that exists in current regulations to sleeve all trays containing letter-size automation rate mail that does not originate and destinate in the delivery area of the same SCF and that may be processed at a BMC or AMF is extended to include trays containing non-automation rate letter-size mail.

### 3. Height and Weight Restrictions

The maximum weight for any single pallet or any pallets stacked together (pallets and mail) is 2,200 pounds as originally proposed.

Pallet maximum height restrictions are increased to 84 inches for stacked pallets as well as for single pallets with pallet boxes. Pallet loads exceeding 84 inches, however, pose safety concerns and handling problems because of the heights of dock doors and ceilings within postal facilities and the heights of doors and internal spaces within Postal Service trailers and other vehicles. This change is more consistent with current practices of many mailers using pallet boxes and stacking smaller pallets to make optimum use of transportation for drop shipping and is an increase from the initial proposed maximum of 77 inches for all pallets including stacked pallets.

The maximum height for single pallets containing packages or sacks (not placed in pallet boxes) will remain at 77 inches as originally proposed. This height limit should not negatively impact mailers because packages on pallets will usually reach the weight maximum of 2,200 pounds before reaching the height limit.

If the Postal Service identifies any non-BMC postal facilities that cannot accommodate a pallet load as high as 84 inches because of physical limitations (for example, low dock door or ceiling heights or other physical obstructions), mailers participating in the plant-verified drop shipment (PVDS) program will be advised of these limitations when they make appointments to deposit mailings. In any such limited

situation, mailers may be asked to prepare pallets less than 84 inches high until the plants are modified to accept standard pallet loads.

Under the revised rules for packages, parcels, and sacks on pallets, mailers must prepare a required level of pallet when they have 500 pounds of mail for that destination. When smaller loads are desirable, mailers may prepare pallets for any required or optional levels of sortation when they have from 250 to 499 pounds of mail for a destination. The minimum weight used to build pallet loads may vary from 250 to 500 pounds for pallets within a single mailing. The original proposal required pallet preparation at 250 pounds.

Trays of letter-size mail on pallets are prepared based on the number of tiers. The revised rules give mailers the option of preparing a pallet when they have from three to five tiers of 1- or 2-foot managed mail (MM) or extended managed mail (EMM) trays with a mandatory preparation requirement at six tiers. The minimum may vary for pallets within a single mailing.

The maximum load for trays on pallets is 12 tiers, not to exceed 2,200 pounds gross. The original proposal would have required mailers to prepare a pallet when they had three tiers of MM trays or two tiers of EMM trays for a required level of sortation.

When placing trays on pallets, mailers must take extra precautions to place the fullest trays on the bottom and the least full trays on top to avoid crushing the lower trays and causing the entire load to topple.

Mailers are reminded that under the Postal Service's guidelines for the plant-verified drop shipment (PVDS) program, the driver is required to unload mail entered at delivery units. In some instances, this unloading requires breaking down palletized loads because of the physical limitations of a delivery unit such as small or congested offices that cannot accommodate large or stacked pallets.

### 4. Stacking Pallets

The Postal Service is proposing to allow mailers to double-stack or triple-stack pallets up to the maximum allowable height and weight (84 inches/2,200 pounds total for the stacked pallets), provided that such pallets are presented for acceptance at the mailer's plant or a postal facility in a manner that ensures safe and efficient unloading, handling, and transporting. Triple-stacking will allow mailers to make better use of transportation for drop shipments when low-weight pallets are prepared.

When stacking pallets, the mailer must place the heaviest pallet on the bottom and the lightest pallet on the top to prevent crushing or other damage to mail on the bottom. If part of the load is crushed, the entire load is likely to collapse.

Stacked pallets must be top-capped (except for the top pallet) and banded together. The top caps must provide a flat surface for safe and efficient stacking and must be of sufficient quality to maintain the integrity of the load and protect the mailpieces. The Postal Service will closely monitor the preparation of all stacked pallets, particularly those that are triple-stacked, to ensure that they can be handled safely and without damage to the mail on the pallets.

Whenever possible, Mailers are requested to place pallets for the same processing facility together to facilitate moving as much mail as possible directly into cross-dock operations at BMCs for further movement into the distribution network.

### 5. Pallet Boxes

Pallet boxes may be used to hold parcels and sacks. The revised proposal allows mailers to use pallet boxes constructed of single-wall or double-wall corrugated fiberboard, as well as triple-wall corrugated fiberboard, provided that the pallet box and its load maintain their stability and integrity throughout transportation and postal processing. In the original proposal, mailers were required to use pallet boxes constructed of triple-wall corrugated fiberboard.

The height of pallet boxes will not be limited except by the maximum combined pallet, box, and mail load (contents of the box) height of 84 inches or by those non-BMC postal facilities that do not have equipment for handling or unloading full-size pallet boxes (boxes more than 60 inches high).

Boxes must be secured to the pallet to ensure that they can be safely unloaded from vehicles (and reloaded, if necessary) and processed as a single unit to the point where the contents are distributed. The mail must be evenly distributed within the pallet box so that the load does not shift in transit and cause the box to break, topple, or fall off the pallet in transit or during processing.

The flexibility in box construction will provide mailers with the opportunity to use boxes that are compatible with those used in their other manufacturing processes and to minimize costs. However, if the Postal Service notifies a mailer that the mailer's pallet boxes continually fail to