

remain intact or that the loads in any way do not meet the basic pallet integrity standards (for example, the load on pallet is not secure or completely contained, has toppled, is leaning, or exceeds the maximum weight or height restrictions), the mailer will be required to meet the Postal Service preparation standards developed by Postal Service Engineering, including the use of triple-wall corrugated fiberboard boxes.

6. Top-Capping

Under the new proposal, mailers are required to top-cap only stacked pallets (the bottom pallet if pallets are presented to the Postal Service double-stacked; the bottom and middle pallets if pallets are presented triple-stacked). Mailers may determine the best method for ensuring pallet integrity and will have the opportunity to use manufacturing materials that already come into their plants as top-capping material. Mailers must not use flimsy paper obtained from ends of paper rolls or similar material as top caps because this material, used alone, can cause stack failure.

The Postal Service's original proposal required top caps meeting strict Postal Service Engineering construction standards on all pallets other than on full-size pallet boxes. Mailers will be required to meet these strict standards only after they are informed by the Postal Service that their methods do not ensure the integrity of mail on pallets that they prepare.

7. Pallet Strapping

The original proposal to require mailers to strap or band (the terms are used interchangeably) all pallets is also

relaxed. Depending on the characteristics of a mail load, strapping might not be the most effective method of ensuring load integrity throughout transportation and processing.

Loads can compress themselves during storage in a mailer's plant or while in transit, causing strapping to become loose. In those instances, stretchwrap can be more effective in securing loads on a single pallet.

Mailers are required to strap all stacked pallets together with at least two straps. The strap must be plastic or metal at least 1/2 inch wide. The minimum breaking strength for plastic strapping must be at least 800 pounds and for metal strapping at least 1,200 pounds. These minimums ensure that the strapping does not break and cause injuries to postal employees handling pallets.

8. Pallets Not Prepared to Finest Level of Sort

The Postal Service recognizes that some mailers have difficulty preparing mailings on pallets to the proposed required levels of sortation and that these mailers will need an opportunity to make necessary changes to their systems and to work with their customers to generate mailings in a manner that is more compatible with placing the mailings onto the required levels of pallets.

To accommodate these needs, the Postal Service will allow mailers to place mailings onto pallets that are not prepared to the required finest levels of sortation for a period not to exceed 6 months from the effective date of the final rule implementing this proposed rule.

Regardless of the level of sortation and whether postal or mailer-provided pallets are used, all pallets must meet all other DMM standards for preparation and labeling based on the class and type of mail.

During this 6-month transition, mailers will be required, at a minimum, to sort individual mailings (a mailing represented by a single mailing statement) to a destination BMC (state distribution center (SDC) for second-class mail) when there are 500 pounds or more of mail (or six tiers of trays) within a single mailing to that BMC/SDC if mailings are presented to destination entry offices under the PVDS program.

Remaining mail may be sacked or bedloaded or placed onto residual or working pallets properly labeled to the origin BMC/SDC or plant (see section 10, Pallet Sortation). Mailers will be required to comply with all DMM standards after the 6-month phase-in.

9. Placement of Automation and Non-Automation Rate Letter-Size Mailings in Trays on Pallets

Mailers may place trays from letter-size automation rate mailings onto pallets together with trays from letter-size non-automation rate mailings prepared to any level of sortation except the optional 5-digit level. This placement will allow mailers to achieve finer levels of sortation using fewer pallets.

10. Pallet Sortation

The proposed required and optional sortations, which are consistent with national distribution network policy changes, are shown in the following chart.

Class and category	Sortation
2C/3C letter-size mail (in trays/sacks on pallets)	Required: SCF, BMC ¹ (3C)/SDC(2C). Optional: 5D, ADC, working pallet. ²
2C/3C/4C flats, irregular parcels, and outside parcels	Required: 5D, SCF. Optional: 3D, ADC, BMC ¹ (3C/4C)/SDC(2C), working pallet. ²
3C/4C machinable parcels	Required: 5D, BMC. ¹ Optional: working. ²

¹ Or ASF for third-class and fourth-class DBMC discounts, as applicable.

² Origin BMC(3C/4C)/SDC(2C) or plant pallet for residual mail. Labeled to BMC/SDC or plant serving post office where mailings are entered (accepted) into mailstream. May be prepared after all required and optional levels of pallets are prepared. Limited to 10 percent of total pallets in any mailing or job. When insufficient volume to prepare finer levels of required pallets for a mailing or job, working pallets for non-PVDS mailings may be prepared in excess of 10 percent limit (all possible optional BMC/SDC pallets must be prepared first, where applicable).

The proposed option to prepare area distribution center (ADC) pallets for mail other than machinable parcels will improve processing opportunities.

Current DMM standards preclude mailers from placing onto pallets SDC, state, and mixed-states packages of second-, third-, and fourth-class mail and trays of residual mail from

automation-rate mailings. SDC, state, and mixed-states packages are generally placed into sacks.

These sacks, like trays of residual mail, may not be placed onto an authorized level of pallet and are generally bedloaded, placed loose in a vehicle on top of authorized pallets, or placed onto unauthorized or "courtesy

pallets" for transport to an entry postal facility.

Because of these restrictions, some mailers cannot create 100 percent palletized mailstreams and these mailers might have to retain sacking operations for a small portion of their mail, while preparing the balance as packages placed directly onto pallets.