Discussion of Comments

I. Maximum Height

A. Single and Stacked Pallets

Eight commenters opposed various parts of the proposal related to the maximum heights for a single pallet and for stacked pallets. Six commenters opposed limiting the height of a single pallet of sacks, parcels, or packages to 77 inches (or letter mail in trays to 12 layers) and asked why the Postal Service proposed a different maximum height for stacked pallets of 84 inches. They expressed concern over the possible loss of trailer cube capacity that might result from the 77-inch limit for drop shipments. Two commenters indicated that because different characteristics of products on pallets affect the stability of a load, the rule should be amended to allow for taller loads based on specific product characteristics; one commenter suggested that the weight limit of 2,200 pounds per pallet or stack of pallets be used as the controlling maximum rather than the total height of pallet loads.

The maximum height of 77 inches for a single pallet is derived from the general acceptance throughout the Postal Service of the Postal-PAK and pallet (with a height of 75 inches), plus allowance for packing material. Pallet loads exceeding a 77-inch height are a problem when loaded onto and unloaded from many smaller trucks and vehicles used to transport mail between postal facilities and when handled within many smaller postal facilities. The type of transportation used to move pallet loads and the facilities through which they are processed vary, depending on the level of pallet sortation and the office of entry. Low dock-door heights and limited ceiling heights within some facilities, as well as low door and internal heights of many Postal Service trailers and vehicles, were factors in establishing this maximum height. By establishing a maximum height of 77 inches for all single pallets, the Postal Service is promoting consistency in preparation standards while ensuring that postal employees can handle pallets safely and efficiently on all transportation and at all facilities, regardless of office of entry or level of sortation. The higher maximum of 84 inches for stacked pallets allows mailers to take advantage of trailer cube capacity for lighter weight pallets and allows the Postal Service to unstack the pallets where necessary to ensure compatibility with Postal Service equipment, transportation, or facilities. The maximum heights of 77 inches for a

single pallet and 84 inches for stacked pallets are adopted in the final rule.

The Postal Service has also determined to limit the number of layers of trays of letter mail to 12, which is equivalent to the maximum height of 77 inches for a single pallet. Mailers will need to monitor their loads carefully to ensure that fuller trays are placed on the bottom and interspersed nearer the top to avoid crushing. As the height and weight of the pallet load increase, so does the likelihood of the lower trays being crushed and causing the entire load to collapse, particularly if the trays are older cardboard managed mail (MM) trays. If a mailing consists of many lessthan-full trays, mailers should consider building loads containing less than the maximum number of layers.

B. Pallet Boxes

A maximum height of 84 inches was proposed for a single pallet box on a pallet, with a possible 60-inch maximum height restriction at some non-BMC facilities. Two commenters suggested that the Postal Service publish a listing of facilities that cannot handle the taller pallet boxes so that software developers can build varying height restrictions into their sortation programs. Ideally, the commenters preferred that all postal facilities be modified to handle pallet boxes that are 84 inches tall (pallet, box, and mail) The Postal Service was in error when it proposed a maximum height of 84 inches for any pallet box because the pallet unloaders being deployed by the Postal Service in bulk mail centers (BMCs) and many processing and distribution centers (P&DCs) can accommodate only pallets with pallet boxes that do not exceed a total height of 77 inches. The Postal Service must cut taller boxes or otherwise alter them to remove the contents manually, resulting in slower service for customers, additional handlings, and inefficient use of newly deployed mechanized equipment. Accordingly, the Postal Service has determined to adopt a 77-inch maximum, which is also consistent with the height of the Postal-PAK and pallet. Because the Postal Service proposed a maximum height of 84 inches and some mailers might have a stock of pallet boxes designed to meet the proposed maximum, the mandatory compliance date will be July 1, 1996, to allow mailers to deplete current stocks of these taller boxes.

II. Pallet Boxes

A. Providing Boxes

One commenter stated that the Postal Service should provide a pallet box "for sack mail shippers that would conform to the specifics outlined in the revisions" to facilitate uniformity and unloading at BMCs. The Postal Service has no plans to purchase additional equipment to provide to sack mailers. The Postal Service is purchasing additional trays and pallets, however, to meet customer demand in preparation for implementation of classification reform.

B. Securing Pallet Boxes

One commenter requested that the proposed requirement that mailers secure boxes to the pallet be optional and indicated that mailers had been entering unsecured boxes on pallets for many years, without any negative comment from the Postal Service. The proposed standard is modified in the final rule to require securing a pallet box to the pallet only if the pallet requires transportation by the Postal Service to move it from the entry office to another postal facility for distribution of the contents and the weight of the mail in the box is insufficient to hold the box in place on the pallet during transportation and processing. This modification is consistent with how the Postal Service prepares and processes mail in its own Postal-PAKs on pallets and ensures that pallets can be loaded and transported safely on Postal Service vehicles and processed as a single unit to the point where the contents are distributed.

C. Construction of Pallet Boxes

No comments were received on the proposal to allow mailers to use pallet boxes constructed of single-, double-, or triple-wall corrugated fiberboard. Single-wall corrugated fiberboard may be used only for light loads (such as lightweight parcels) that do not require transportation beyond the entry office. The Postal Service will monitor mailings presented in pallet boxes to ensure that the box construction maintains its integrity to the point of distribution of the contents.

III. Pallet Load Integrity

Failure of pallets to meet basic DMM standards negates efforts to ensure safe and efficient handling of palletized loads. Accordingly, all pallets presented to the Postal Service for acceptance, whether the pallets are provided by the Postal Service or the mailer, must meet the basic standards in the DMM pertaining to pallet labels, physical