

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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Postal Rate and Fee Changes

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF TIME WARNER INC.  
TO UNITED STATES POSTAL SERVICE WITNESS TALMO  
(TW/USPS-T27-1-9)  
(May 23, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatories to United States Postal Service witness Talmo (USPS-T-27).

If witness Talmo is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or by another person capable of providing an answer.

Respectfully submitted,

s/ \_\_\_\_\_  
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**FIRST SET OF INTERROGATORIES TO WITNESS TALMO  
(USPS-T-27)**

TW/USPS-T27-1 Please refer to your model in LR-L-85 of sack and pallet processing at destinating facilities.

- a. Please confirm that your model assumes a sack with flats bundles undergoes the following operations at the destinating facility:
  - (1) unload OWC;
  - (2) move OWC to bundle sort operation;
  - (3) dump sack at bundle sort;
  - (4) handle empty sack; and
  - (5) handle empty OWC.
- b. Please confirm that your model assumes the sack can be transported directly to the bundle sorting operation without first going through a sack sorting operation. If not confirmed, please explain.
- c. Please confirm that your model does not include the time a postal employee would spend reading the sack label in order to determine:
  - (1) whether this is the destinating facility for that particular sack; and
  - (2) which particular bundle sorting operation this particular sack should be dumped at. If not confirmed, please explain and provide documentation to support your belief that reading sack labels is included in your model.
- d. Please confirm that your model does not consider the possibility that sacks might be bedloaded in the truck in which they arrive at the destinating facility.
- e. Please confirm that your model does not include the extra costs that are incurred when bundles break because of having been transported in sacks rather than on pallets.
- f. Please confirm that the operation “dump sack at bundle sort” includes untying the sack so that its contents can be dumped.
- g. Please confirm that your model assumes 45.114 pieces per sack. Please confirm also that for a sack containing many fewer pieces, the per-piece sack related costs you derive in LR-L-85 would be much higher.

TW/USPS-T27-2 Please confirm that the term “OWC” as used in LR-L-85 refers to any container into which sacks have been placed, either by a mailer or by the Postal Service at an upstream facility. Please also explain the origin of

the term and what the letters stand for. Additionally, please list the most commonly used containers in which sacks arrive at a destinating facility and indicate approximately what percent of Periodicals sacks arrive in each type of container. In particular, approximately what percent of the containers that arrive at destinating facilities with Periodicals sacks are likely to be:

- (1) hampers;
- (2) APCs or other wheeled metal containers;
- (3) Pallets with cardboard boxes, e.g., postal paks; or
- (4) other types of containers?

TW/USPS-T27-3 Please assume that a rolling container (e.g., hamper, APC) arrives at an SCF with Periodicals sacks that have been placed in that container at an upstream postal facility. Assume further that the container includes sacks with SCF, 3-digit, 5-digit, carrier routes and carrier route presort. Assume also that some of the 5-digit, carrier routes and carrier route sacks will be transferred to their respective DDUs before being opened, i.e., the SCF is not the destinating facility for all the sacks in the given container.

- a. Please confirm that before the 3-digit/SCF sacks in this container can be dumped at a 3-digit/SCF bundle sorting operation they must be separated from the 5-digit, carrier routes and carrier route sacks that arrived in the same container. Please confirm also that, unless the SCF has a sack sorting machine capable of reading sack labels, performing such a separation involves at least (1) manually reading the sack label and (2) manually placing the sacks that are to be taken to the 3-digit/SCF bundle sorting operation in a separate container. Please explain if not confirmed.
- b. Please confirm that before the 5-digit, carrier routes and carrier route sacks to a particular 5-digit zone can be moved to their respective bundle dumping/sorting operations they must be separated from sacks to other 5-digit zones as well as from the 3-digit/SCF sacks that are in the same container. Please confirm also that, unless the SCF has a sack sorting machine capable of reading sack labels, performing such a separation involves at least (1) manually reading the sack label and (2) manually placing the sacks for that 5-digit zone in one or more separate containers. Please explain if not confirmed.

TW/USPS-T27-4 Please assume that a rolling container (e.g., hamper, APC) arrives at an ADC with Periodicals sacks that have been placed in that container at an upstream postal facility. Assume further that the container includes sacks with ADC, SCF, 3-digit, 5-digit, carrier routes and carrier route presort.

Please confirm that before the ADC sacks in this container can be dumped at an ADC bundle sorting operation they must be separated from the sacks with higher presort level that arrived in the same container. Please confirm also that, unless

the ADC has a sack sorting machine capable of reading sack labels, performing such a separation involves at least (1) manually reading the sack label and (2) manually placing the sacks that are to be taken to the ADC bundle sorting operation in a separate container. Please explain if not confirmed.

TW/USPS-T27-5 Please assume that a BMC is sorting Periodicals sacks that are then sent to different SCF's and ADC's in the BMC service area.

- a. Is it likely that such a BMC sack sort operation would place the 3-digit sacks to the particular SCF in a container separate from the container(s) into which 5-digit, carrier routes and carrier route sacks to the same SCF are sorted? If you believe this is likely, then please provide an approximate estimate of the percent of 3-digit sacks, sorted to the destinating SCF by a BMC, that are segregated at the BMC from sacks with higher presort going to the same SCF.
- b. Is it likely that such a BMC sack sort operation would place the sacks to a particular 5-digit zone within the SCF in a container separate from the container(s) into which other sacks to the same SCF are sorted? If you believe this is likely, then please provide an approximate estimate of the percent of 5-digit sacks, sorted to the destinating SCF by a BMC, that are segregated at the BMC from sacks to other 5-digit zones within the same SCF.

TW/USPS-T27-6 Please assume that an outgoing sack operation at a Periodicals ADC sorts sacks destined to other ADCs. Consider the sacks to a given destinating ADC that is not also the originating ADC.

Is it likely that such an outgoing ADC sack sort operation would place the ADC sacks to the given destinating ADC in a container separate from the container(s) into which SCF, 3-digit, 5-digit, carrier routes and carrier route sacks to the same ADC are sorted? If you believe this is likely, then please provide an approximate estimate of the percent of ADC sacks, sorted to the destinating ADC at the originating ADC, that are segregated at the originating ADC from sacks with higher presort going to the same destinating ADC.

TW/USPS-T27-7 Please provide an estimate, consistent with Postal Service industrial engineering methodology, of the productivity rate (sacks per man-hour) in manual sack sorting operations performed at SCFs. Please provide all relevant source references and documentation.

TW/USPS-T27-8 Please state whether the Postal Service has any empirically derived estimate of the productivity rate (sacks per man-hour) of manual sack sorting operations performed at SCFs. If such an estimate exists, please provide it along with all relevant documentation.

TW/USPS-T27-9 LR-L-85 indicates nine different mail processing productivity rates. It cites the PGL (planning guidelines) as the source for two and Postal Service testimonies in docket No. R2000-1 as sources for the other seven. Please note that the following questions are not about which Postal Service witnesses may have used the same data in the past, but rather about the way in which each productivity rate estimate was originally obtained.

- a. Please state which of the cited productivity rates originate from the application of industrial engineering methodology, and for each such rate explain specifically which movements and actions on the part of postal employees were assumed in order to arrive at the cited rates.
- b. Please state which of the cited productivity rates originate from Postal Service surveys. For each rate that originated from a survey please state the year in which the survey was conducted and provide references and all relevant documentation.