

INTERROGATORIES TO UNITED STATES POSTAL SERVICE

TW/USPS-1 In response to interrogatories TW/USPS-T27-7-8, redirected from witness Talmo, the Postal Service indicates that it has no information regarding either industrial engineering based or empirically based productivity rates for manual sack sorting performed at SCF's.

- a. Please confirm that MODS number 235 is used by employees engaged in manual sorting of sacks and outsides at MODS facilities. If not confirmed, please describe how this MODS number is used.
- b. According to witness Bozzo's response to TW/USPS-T13-11b, redirected from witness Van-Ty-Smith, MODS number 235 had TPH equal to 393,787,584 sacks/outsides and a total of 3,606,561 recorded workhours in FY2005. Dividing the two gives approximately 109 sacks/outsides per workhour. Please confirm that this is an empirically based measure of the productivity rate at MODS operation 235.
- c. Are there any other MODS numbers that are designated for employees engaged primarily in manual sorting of sacks and/or outside parcels? If yes, please list them and describe further the particular function associated with each such MODS number.
- d. Is there any MODS number designated for employees at a sawtooth type operation? If yes, what is it?
- e. If the Postal Service knows any reason why the MODS productivity rate at MODS operation 235 might not be suitable for the purpose of estimating the costs associated with manual sack sorting at SCF's, please explain those reasons.

TW/USPS-2 Please provide a copy of the most recent version of the MODS manual. Please indicate also whether a revised version of the manual is expected in the near future, and whether substantial changes have been made since publication of the current version. If there is more than one type of MODS manual, please state what they are and provide copies of each.