

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

COMPLAINT OF TIME WARNER INC ET AL.
CONCERNING PERIODICALS RATES

Docket No. C2004-1

UNITED STATES POSTAL SERVICE
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
TIME WARNER ET AL. WITNESS STRALBERG
(USPS/TW ET AL.-T2-27)

Pursuant to rules 25 through 27 of the Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatory and request for production of documents to Time Warner Inc. et al. witness Stralberg:
USPS/TW et al.-T2-27.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

/s/ _____
David H. Rubin

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July 6, 2004

USPS/TW et al.-T2-27 In your response to USPS/TW et al.-T2-7(a) you state, "Some years ago when I was able to compare productivity rates in many different facilities, it appeared that the small facilities were achieving higher productivity rates, especially in manual operations. I used to conclude that this discrepancy had more to do with stability and morale of the workforce in more rural locations than with volume and such."

(a) Please confirm that when a clerk performs a manual sortation at a small facility, such as a delivery unit, he or she must be trained on the "scheme" for the ZIP Code(s) within that delivery unit. In other words, the clerk must be able to look at the address for a given mail piece and know which carrier is responsible for delivering that mail piece. If not confirmed, please explain.

(b) Please confirm that as the Postal Service has automated letter and flat operations over the last decade the number of employees with scheme skills in larger plants has decreased, as operations that formerly required scheme knowledge (e.g., LSMs, FSM881s, etc.) were no longer required. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

/s/
David H. Rubin

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