

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

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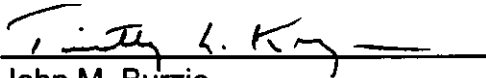
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF TIME WARNER INC.
TO WITNESS EGGLESTON (TW/USPS-T26-1-2)
(February 15, 2000)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Eggleston (USPS-T-26). If witness Eggleston is unable to respond to any interrogatory, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,


John M. Burzio
Timothy L. Keegan

Counsel for
Time Warner Inc.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
tel/(202) 965-4555
fax/(202) 965-4432

FIRST SET OF INTERROGATORIES TO WITNESS EGGLESTON (USPS-T-26)

TW/USPS-T26-1 Please refer to page 3 of Attachment A to your testimony, containing a table titled "Productivities, Conversion Factors and Variabilities for Direct Labor Operations." Refer to the line called "manually dump sacks at non-BMC" showing a productivity rate of 110.9. Next to this number is a reference to footnote 3 which says: "Proxy based on Planning Guidelines (PGLs)."

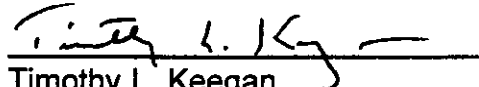
- a. Please confirm that in the electronic version the 110.9 figure is derived as $99.4/0.896$, where 99.4 represents sacks per manhour and 0.896 is a volume variability figure. If not confirmed, please explain.
- b. What are the "Planning Guidelines," by whom are they used and for what types of purpose?
- c. How were the "Planning Guidelines" developed? How and how often are they updated?
- d. Please provide a current copy of the "Planning Guidelines." If such a copy already has been provided in this or an earlier docket, please provide references.
- e. How was the 99.4 productivity figure calculated? Please provide all information available to the Postal Service regarding the origin of this and all other productivity estimates in the "Planning Guidelines."
- f. Did the 99.4 sacks per hour figure originate from an MTM (Methods Time Measurement) standard?
- g. Which of the following does the 99.4 sacks per manhour figure include: (1) breaks and personal needs; (2) clocking in/out; (3) other "not handling" time; or (4) empty equipment handling? If any of the above are included, please explain how.
- h. Which of the following activities are included in the productivity rate for dumping of sacks at non-BMC's referred to above: (1) getting the sack from a belt, slide or container; (2) eye-focus and reading the sack label; (3) untying the sack; or (4) straightening the sack and storing it for recycling after it has been emptied?

TW/USPS-T26-2 Please refer to page 3 of Attachment A to your testimony, containing a table titled "Productivities, Conversion Factors and Variabilities for Direct Labor Operations." Please refer to the line called "Sack shake out" which shows a productivity rate of 71.8 sacks per manhour.

- a. Does this refer to the mechanized sack shake out operation performed at BMC's? If no, what does it refer to?
- b. If the manual productivity rate for emptying sacks, referred to on the next line, is faster than the mechanized method, then why does the Postal Service continue to use the mechanized method? Please explain fully.
- c. The footnote next to the 71.8 productivity figure refers to an R97-1 testimony. Please explain how the 71.8 figure was originally derived.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.



Timothy L. Keegan

February 15, 2000