

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
TIME WARNER, INC.
(TW/USPS-T0-1)

The United States Postal Service hereby provides its response to the following
interrogatory of Time Warner, Inc.: TW/USPS-1, filed on February 7, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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February 22, 2000

**Response of the United States Postal Service
to Interrogatory of Time Warner Inc.**

TW/USPS-1. Please refer to Table I-2B, which provides FY98 manhours per MODS code, organized per LDC.

- a. Please confirm that MODS also provides measures of mail volumes, as pieces handled (TPH) and pieces fed (TPF) at the MODS operations under LDC 11, 12, 13 and 14. If not fully confirmed, please specify which volume measures are produced in MODS for each of the MODS codes listed under those LDC codes.**
- b. Please provide the available measures of FY98 MODS volumes for each MODS code under LDC's 11, 12, 13 and 14. Please provide the results in spreadsheet form, if possible.**
- c. Please provide MODS FY99 measures of mail volumes and manhours for each MODS code under LDC's 11, 12, 13 and 14.**
- d. Are MODS data for mail volumes and manhours for the operations referred to above available for any portion of FY2000? If yes, provide that information for the accounting periods for which it is available. If not, when is such information likely to be available.**

TW/USPS-1 Response.

It is assumed that the question refers to Table I-2B of USPS-T-17.

- a. Confirmed. Please note that TPF are normally not recorded for manual operations.**
- b. FY98 MODS TPH and TPF data for the referenced operation numbers will be provided in LR-I-190.**
- c. FY99 MODS TPH, TPF and workhour data for the referenced operation numbers will be provided in LR-I-190.**

**Response of the United States Postal Service
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- d. Yes, MODS data are available for a portion of FY2000. As of this writing, accounting period (AP) 5 is the most recent full period available. FY2000 TPH, TPF and workhour data through AP5 will be provided in LR-I-190.

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.



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