

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

INTERROGATORIES OF TIME WARNER INC.
TO WITNESS VAN-TY-SMITH (TW/USPS-T17-11-16)
(March 6, 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 Van-Ty-Smith (USPS-T-17). If witness Van-Ty-Smith 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,



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THIRD SET OF INTERROGATORIES TO WITNESS VAN-TY-SMITH (USPS-T-17)

TW/USPS-T17-11 For each mail processing cost pool and for each type of sack represented in the IOCS data base, please provide, in an electronic spreadsheet format, the BY98 processing costs your method attributes to use of the given sack type, at the given pool, by each subclass. Please also specify the portion of the cost attribution for each combination of sack type, cost pool and subclass that is caused by each of the following types of tallies:

- a. Direct tallies of the given sack type at the given pool.
- b. Mixed mail tallies of the given sack type that are distributed on the basis of the direct sack tallies.
- c. Tallies of the given sack type when empty, that are distributed based on the direct sack tallies.
- d. Tallies of mixed mail containers recorded as carrying sacks of the given type, attributed on the basis of direct mail tallies for the given sack type.
- e. Tallies of empty or unidentified containers, whose costs are attributed based on the portion of the corresponding type of containers with mail that relates to these containers carrying sacks of the given type.
- f. Not handling tallies, to the extent that the costs associated with such tallies are distributed over any of the sack related handling costs described above.

TW/USPS-T17-12 Please provide cost information similar to that sought in TW/USPS-T17-11, but for each type of tray, rather than sacks.

TW/USPS-T17-13 Please provide cost information similar to that sought in TW/USPS-T17-11, but for pallets instead of sacks.

TW/USPS-T17-14 Please consider an employee sampled by an IOCS clerk while using a forklift to move a pallet that is loaded with empty letter trays.

- a. Please confirm that under current data collection instructions the IOCS clerk has no way of recording the fact that the observed pallet was used to carry letter trays. If not confirmed, please describe how such information would be recorded and how it would appear in the IOCS data base.

- b. Please confirm that a tally resulting from the type of observation described above would not cause any cost to be associated with letter trays. If not confirmed, please explain.
- c. How would the IOCS clerk record the situation described above? Specifically, would he/she record it as: (1) an empty pallet; (2) a pallet whose content could not be determined; or (3) something else (describe)? Are the current instructions clear as to what choice should be made in this situation?
- d. Assume that instead of being empty, the trays on the pallet contain letter mail, but the IOCS clerk is unable to determine whether all mail on the pallet is identical and concludes that counting the mail would require removing the shrink wrap or banding on the pallet and would be prohibitively time consuming. What type of tally would result in this case? Would it be recorded as a mixed mail pallet? If not, how?

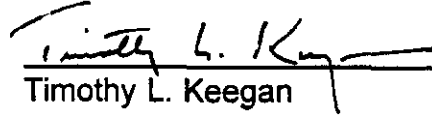
TW/USPS-T17-15 Assume that a postal pak, or "gaylord," arrives at a postal facility and is emptied of its contents, but in the process it becomes necessary to strip the postal pak/gaylord of its cardboard, leaving only the pallet underneath, and that an IOCS clerk intercepts the employee handling the resulting empty pallet. Would this be recorded as an empty pallet or an empty postal pak? Please explain your answer and provide references to any mention of this scenario in the IOCS data collection instructions.

TW/USPS-T17-16 In today's mail processing plants, including BMC's, one frequently sees pallets carrying empty trays, empty sacks, trays with letter or flat mail in them, sacks with mail in them, pallets loaded with other empty pallets, as well of course as pallets loaded with flats bundles, parcels, IPP's, etc.

- a. Has there been any recent study to determine the frequency with which each of the above occurs in different types of facilities? If yes, please identify each such study, summarize the results and provide copies of each relevant study report.
- b. Please identify all uses the Postal Service itself makes of pallets in today's environment, to transport mail as well as other items (e.g., sacks and trays). Indicate whether each type of usage is part of normal operating procedures or whether it occurs only in unusual circumstances. Please also indicate the types of facilities in which each type of usage occurs, any estimates of how frequently it occurs, and provide copies of any relevant operating instructions.

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

March 6, 2000