

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

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POSTAL RATE AND FEE CHANGES
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS VAN-TY-SMITH TO INTERROGATORIES OF
TIME WARNER, INC.
(TW/USPS-T17-7-10)

The United States Postal Service hereby provides the responses of witness Van-Ty-Smith to the following interrogatories of Time Warner, Inc.: TW/USPS-T17-7-10, filed on February 22, 2000. Interrogatories TW/USPS-T17-5-6 were redirected to witness Ramage.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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March 7, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO
TW INTERROGATORIES**

TW/USPS-T17-5 Please refer to USPS-LR-1-14, which contains a June 1998 version of Handbook F-45, In-Office Cost System, Field Operating Instructions. Included with the manual is a June 1998 Transmittal letter, declaring previous issues of handbook F-45 and update memos obsolete and stating that the new handbook takes effect immediately. Given that June 1998 was a few months before the end of FY98, please answer the following.

- a. At what time did the IOCS data collectors effectively start to use the new CODES software described in LR-1-14?
- b. During which portion of FY98, and for which portion of the tallies in the FY98 IOCS data base, were IOCS data collectors using the updated instructions in LR-f-14?
- c. Generally, what is the typical delay between the times when: (1) IOCS data collection procedures are modified at headquarters; and (2) data collectors in the field have been fully trained in the revised procedures and are following the revised procedures in the collection of live data?

RESPONSE TO TW/USPS-T17-5 .

Redirected to witness Ramage (USPS-T-2).

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TW/USPS-T17-6 Were the instructions followed by IOCS data collectors with regard to responses to Question 19 in FY98 different from the Question 19 instructions they followed in FY96? If yes, please describe in detail all differences.

RESPONSE TO TW/USPS-T17-6

Redirected to witness Ramage (USPS-T-2).

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TW/USPS-TI7-7 Please refer to the IOCS data in file PRC98.sd2 in USPS LR1-12.

- a. Please confirm that the file contains FY98 clerk and mailhandler tally data.
- b. Please confirm that not a single Non-MODS tally has been assigned activity codes 5610, 5620 or 5700.
- c. Please confirm that the FY96 IOCS data used in R97-1 by the Postal Service and the Commission for Non-MODS facilities contained a substantial number of both "not handling" and mixed mail tallies that had been assigned activity codes 5610, 5620 and 5700.
- d. Please confirm that in MODS offices, activity codes 5610, 5620 or 5700 have been assigned only in the following cost pools: MISC, SUPPORT, EEQMT, EXPRESS, INTL, LD480TH, LD48ADM, LD48-SSV, LD49 and REWRAP. If not confirmed, please explain.
- e. Please confirm that the FY96 IOCS data used in R97-1 by the Postal Service and the Commission for MODS offices contained substantial numbers of both "not handling" and mixed mail tallies that had been assigned activity codes 5610, 5620 and 5700 for practically all cost pools, including the various allied and piece distribution operations.
- f. Please explain all changes made by the Postal Service since its R97-1 filing, including computer programming changes and documented or undocumented instructions to IOCS data collectors, that have caused most uses of activity code\$ 5610, 5620 and 5700 to disappear. If documentation of such changes exists on the record in this or previous dockets, Please provide all relevant references. If documentation exists that has not been provided earlier, then please provide it.
- g. If tallies that previously would have been assigned activity codes 5610, 5620 and 3700 [sic] are now being assigned different codes, please explain which alternative codes are used and the circumstances under which they are used.
- h. Does there exist another version of the FY98 IOCS data where activity codes 5610, 5620 and 5700 have been assigned in the same way as in previous dockets? If yes, please provide a copy.
- i. Was there a deliberate decision made to no longer assign activity codes 5610, 5620 or 5700 for Non-MODS tallies or for MODS tallies at allied and piece distribution operations? If yes, please explain all reasons why this decision was made and by whom it was made.
- j. Apart from the apparent change in the assignment of activity codes 5610, 5620 and 3700 from Question 19 responses by IOCS data collectors, have there been

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other changes made in the way that activity codes are assigned to IOCS tallies on the basis of the raw data? If there are other such changes, please document them in detail.

RESPONSE TO TW/USPS-T-17-7.

This question erroneously assumes that changes in either data collection and/or computer programming have caused instances of activity codes 5610, 5620, and 5700 to "disappear." In reality, activity codes 5610, 5620 and 5700 are assigned to the tallies in the PRC98.sd2 file in USPS LR-I-12 as they were in Docket No. R97-1, however, they are now stored in the tally field F9806. The assignment of these codes is otherwise unchanged from Docket No. R97-1.

Please note that the mixed shape activity codes 5610, 5620, and 5700 are not based on collected mixed mail shape data. They are assigned by Program ALB101S1¹ to all tallies with activity code 5750², based on the predominant shape of the piece distribution operation where the employee was observed to be in Question 19

- a. Confirmed.
- b. Not confirmed. See the discussion prior to the response to part a, above.

¹ Program ALB101S1 documentation is contained in USPS-LR-I-12, section VII.A, and the program listing itself is contained on the CD-ROM accompanying USPS-LR-I-12, as described in Appendix H of USPS-LR-I-12. The assignment of 5610, 5620, and 5700 occurs in the SAS data step "data tally101" which immediately follows the comment:

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* 5. Assign shape related activity codes to mixed all ;  
* shapes based on operation codes. ;  
*-----;
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² Those tallies include all tallies with activity codes 5750 in IOCS field F244, as well as those with activity codes 5740 and 5745, which the program recodes as 5750.

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- c. Confirmed that activity codes 5610, 5620, and 5700 were also assigned to tallies taken at non-MODS facilities in Docket No. R97-1.
- d. Not confirmed. See the discussion prior to the response to part a, above.
- e. Confirmed that activity codes 5610, 5620, and 5700 were also assigned to tallies taken at MODS facilities in Docket No. R97-1.
- f. See the discussion prior to the response to part a, above.
- g. See the discussion prior to the response to part a, above.
- h. See the discussion prior to the response to part a, above.
- i. See the discussion prior to the response to part a, above.
- j. See the discussion prior to the response to part a, above.

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TW/USPS-T17-8 Does there exist a version of the aggregated FY98 IOCS data containing the actual responses to Question 19? If yes, please provide it and identify the field(s) in which the Question 19 data are located. If such a file already has been provided on the record, please refer to it.

RESPONSE TO TW/USPS-T17-8

The PRC98.sd2 file in USPS LR-I-12 contains the actual responses to Question 19.

They are located in IOCS fields F128, F9211 and F9212. My responses to TW/USPS-

T-17-2 c & d indicate the sections of the library reference which contain information relevant to these fields.

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TW/USPS-T17-9 Please tabulate the results of Question 19 responses by IOCS data collectors in the base year as instructed below. Please provide the information in the form of an electronic spreadsheet, separately for each MODS, Non-MODS and BMC cost pool, and in terms of number of tallies as well as tally dollars.

- a. For all "not handling" tallies at a given pool, excluding tallies related to breaks, clocking in/out or handling empty equipment, please tabulate the responses to Question 19 in all cases where the data collector responded to this question. Specifically, tabulate the number of tallies and corresponding tally dollars for each response A through U in the first table on page 11-30 in LR-I-14, and in case the choice made was A (manual) provide a further breakdown according to responses a through i listed in the second table on page 11-30 of LR-1-14.
- b. For all "not handling" tallies at a given pool with activity code 6323 (empty equipment) where the data collector also responded to Question 19, please provide a tabulation of those responses similar to that explained in part a of this interrogatory.
- c. For all "mixed mail" tallies representing empty equipment (or unidentified container) handling at a given pool, where the data collector also responded to Question 19, please provide a tabulation of those responses similar to that explained in part a of this interrogatory, but separately for each type of container or item.
- d. For all "mixed mail" tallies representing handling of non-empty containers at a given pool, where the data collector also responded to Question 19, please provide a tabulation of those responses similar to that explained in part a of this interrogatory, but separately for each type of container.

RESPONSE TO TW/USPS-T17-9

(a)-(d) The requested tables in EXCEL format are contained in the diskette filed in USPS-LR-I-222. Please note that the responses to a. and b. are consolidated into the same table.

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TW/USPS-TI7-10 Does your mail processing cost distribution make any use of the activity codes 5610, 5620 or 5700 for some mixed mail and not handling tallies at any of these cost pools: MISC, SUPPORT, EEQMT, EXPRESS, INTL, LD480TH, LD48ADM, LD48-SSV, LD49 and REWRAP? If yes, please explain how you use this information.

RESPONSE TO TW/USPS-TI7-10.

No.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van Ty Smith

Dated: 3/7/00

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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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March 7, 2000