

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 UNITED STATES POSTAL SERVICE WITNESS  
KINGSLEY (TW/USPS-T10-1-4)  
(March 10, 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 Kingsley (USPS-T-10). If witness Kingsley 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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**FIRST INTERROGATORIES OF TIME WARNER INC. TO WITNESS  
KINGSLEY (USPS-T-10)**

TW/USPS-T10-1 In your answer to PostCom/USPS-10-2a you state:

*"Barcoded flats allow use of a lower paid clerk in comparison with the clerk required for keying non-barcoded flats on the FSM-1000 and non-barcoded OCR rejects on the FSM-881."*

Please elaborate on how this works in practice. In particular:

- a. What are the two pay-levels to which your statement refers, and what is the hourly differential between them?
- b. Can the feeding of barcoded flats on an FSM-1000 also be done by the lower paid clerks?
- c. Will a given clerk be paid at a different scale depending on whether he/she is keying flats at an FSM or simply feeding flats in BCR/OCR mode? Or will a given clerk be paid at the same level regardless?
- d. How do the two FSM clerk pay levels to which you refer compare with the pay levels for: (1) manual flat sorting, without required scheme knowledge; (2) manual flat sorting, with scheme knowledge; (3) OCR clerks; and (4) BCR clerks?
- e. Can an FSM-881 clerk being paid at the lower level, who normally is used only for sortation in BCR/OCR mode, be asked to work on keying non-barcoded flats without violating any work rules? If yes, will he be paid extra?
- f. Assume that a facility has an FSM crew of lower paid workers on Tour 1 who on a given night sorts barcoded flats until 4 am, at which point all the flats available for sorting are flats that must be keyed. Assume this is the only FSM crew available. What do instructions require be done to those flats, if they are time sensitive and if they are not? And what will be done with the workers who have become idle because they are not supposed to be keying flats?

TW/USPS-T10-2

- a. In FY98, what percentages of FSM-881 clerk hours were paid at respectively the higher and lower pay scale? Please provide similar information for FY97 and FY99, and the projected percentage for TY2001.

- b. What was the average wage rate for FSM-881 clerks in FY98? Please provide similar information for FY97, FY99, and the projected rate for TY2001.
- c. In FY98, what percentages of FSM-1000 clerk hours were paid at respectively the higher and lower pay scale? Please provide similar information for FY99, and the projected percentage for TY2001.
- d. What was the average wage rate for FSM-1000 clerks in FY98? Please provide similar information for FY99 and the projected rate for TY2001.
- e. What does the Postal Service expect will be the typical pay-level for workers on AFSM-100 machines?
- f. What is the projected AFSM-100 wage rate in TY2001?

TW/USPS-T10-3 Please describe as fully as possible the Postal Service's general strategy and current plans for managing the transition from flats being mostly sorted manually or by FSM keying, to them being mostly just fed into machines in BCR/OCR sorting modes, by clerks who are paid less. In particular:

- a. Has there been or will there be a program or programs to reduce the pay for existing FSM workers to reflect the reduced use of keying in FSM sortation? If yes, please elaborate.
- b. Has there been or will there be a program or programs to replace existing FSM workers with lower paid workers to reflect the reduced use of keying in FSM sortation? If yes, please elaborate. Particularly: what is being done and will be done with the higher paid workers who no longer are needed to sustain FSM productivity?
- c. What is the Postal Service doing, and what does it plan to do, to counter the obvious incentives at this time for FSM workers and their unions to sort more mail manually, or to use keying on FSM's, in order to protect jobs?

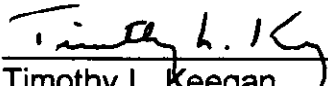
TW/USPS-T10-4 Please confirm that on a current FSM-1000 machine barcodes can be read on pieces fed at the first three keying stations but not at the fourth one, because of its location relative to the barcode reader. Additionally:

- a. Are there any plans to modify the FSM-1000 layout so as to enable barcoded mail to be fed at all four stations? If yes, please describe those plans and when they are expected to be realized.

- b. Are the current plans for FSM-1000 machines to use only the higher paid workers who are expected to also be able to key flats, or to use at least some lower paid workers on the FSM-1000's as well?

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.

  
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Timothy L. Keegan

March 10, 2000