

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 INTERROGATORIES OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS VAN-TY-SMITH
(TW/USPS-T17-14(a, c-d)-15)

The United States Postal Service hereby provides the responses of witness Ramage to the following interrogatories of Time Warner, Inc.: TW/USPS-T17-14(a, c-d)-15, filed on March 6, 2000, and redirected from witness Van-Ty-Smith.

Each 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

K N Hollies
Kenneth N. Hollies

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.

K N Hollies
Kenneth N. Hollies

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March 20, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAMAGE
INTERROGATORIES OF TIME WARNER, INC.,
REDIRECTED FROM WITNESS VAN-TY SMITH**

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?

RESPONSE:

- a. Not confirmed. See the response to part c, below.
- b. Answered by witness Van-Ty-Smith.
- c. The instructions for recording this scenario are contained in the Handbook F-45 (USPS-LR-I-14), pages 12-1 through 12-7. I have been informed that data collectors may treat a pallet loaded with empty letter trays in either of two ways, depending on whether or not the pallet has been shrink-wrapped, banded or otherwise unitized. If the pallet has been unitized, it is recorded as a single item in IOCS Q21, then as an empty pallet in IOCS Q21B, and the presence of letter trays would not be recorded. If the pallet has not been unitized, then it would be recorded as a container or multiple items not in a container in IOCS Q21 and

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- Q21C. The container type would be either "i. Multiple Items Not in a Container" or "j. Other Container", and the percentage of letter trays could be recorded in IOCS Q21D. It is not possible to identify all such instances on the IOCS data base because the data collector may not always indicate the presence of the pallet itself in IOCS Q21D. In either case, this scenario results in activity code "6523", moving empty equipment, being assigned in program ALB040C0. See USPS-LR-I-12, Appendix B, pages 5.0, 7.3, 7.5 and 8.0.**
- d. This would not be recorded as empty equipment, otherwise my response to part c applies. This type of tally would result in an activity code of either "5745", Mixed Mail (handling container or multiple items) or of "5740", Mixed Mail (handling single item) in program ALB040C0. See USPS-LR-I-12, Appendix B, page 8.0.**

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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.

RESPONSE:

If the sampled employee is handling a pallet, then the it would be recorded as an empty pallet in IOCS question 21B. This would be the case even if the pallet has been created by stripping down a postal pak so that only an empty pallet remains. This specific scenario is not mentioned in the IOCS data collector instructions, but I have verified with the Statistical Programs Service Centers that this is how the data collector would record such a pallet.

DECLARATION

I, Mark F. Ramage, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Mark F. Ramage

Date: March 20, 2000