

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

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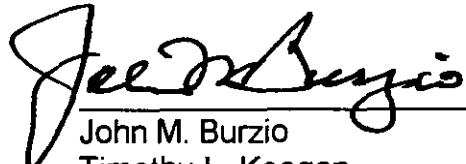
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS
RAMAGE (TW/USPS-T2-1-3)
(March 23, 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 Ramage (USPS-T-2). If witness Ramage 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,


John M. Burzio
Timothy L. Keegan

Counsel for
Time Warner Inc.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
tel/(202) 965-4555
fax/(202) 965-4432

**INTERROGATORIES OF TIME WARNER INC.
TO WITNESS RAMAGE (USPS-T-2)**

TW/USPS-T2-1 Please refer to your answer to TW/USPS-T17-14a, in which you did not confirm, referring to TW/USPS-T17-14c, and your answer to TW/USPS-T17-14c, in which you state:

“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. ”

You also state in that answer:

“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 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 Q21 D. 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.”

- a. The preamble to TW/USPS-T17-14 referred to a loaded pallet being moved by a fork lift. Is it normal that loaded pallets are moved by forklift before the load has been “unitized”? If yes, then please identify the conditions under which such a move would not represent a safety problem.
- b. There appears to be no specific mention on pages 12-1 through 12-7 in Handbook F-45 of the two ways to record a pallet that you say you have been informed of. Please state who informed you of this.
- c. If specific written documentation of the two ways to record a pallet exists, please state where and provide a copy unless the document already is part of the record in this docket. Also, please describe how and using which material this policy is normally explained to IOCS field personnel.

TW/USPS-T2-2 Please refer to your answers to TW/USPS-T17-14a, c and d and to TW/USPS-T17-15. Please answer the following and explain each answer, if possible with specific references to written IOCS documentation. If any of your answers cannot be supported by existing written documentation, please specify your sources, their qualifications and the reasoning on which each answer is based.

- a. Assume that a pallet with Periodicals bundles has been brought into an opening unit where the bundles will be distributed. Assume further that an employee is intercepted by an IOCS data collector while in the process of

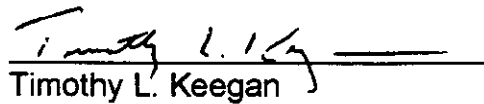
- removing the shrinkwrap material used to "unitize" the pallet. How would this pallet and its contents be recorded?
- b. Assume that a pallet with trays of letter mail has been brought into an opening unit where the bundles will be distributed. Assume further that an employee is intercepted by an IOCS data collector while in the process of removing the shrinkwrap material used to "unitize" the pallet. How would this pallet and its contents be recorded?
 - c. Assume that a pallet with Periodicals bundles has been brought into an opening unit where the bundles will be distributed. Assume further that the shrinkwrap material used to "unitize" the pallet has been removed and that an employee sampled by an IOCS clerk is in the process of distributing the bundles. How would this pallet and its contents be recorded?
 - d. Assume that a pallet with trays of letter mail has been brought into an opening unit where the trays will be distributed. Assume further that the shrinkwrap material used to "unitize" the pallet has been removed and that an employee sampled by an IOCS clerk is in the process of distributing the trays. How would this pallet and its contents be recorded?
 - e. Assume that a pallet has been loaded with empty letter trays and an employee is in the process of applying shrinkwrap material to secure the load when he is intercepted by an IOCS clerk. How would this pallet and its contents be recorded? Please answer this question also in the case that the load placed on the pallet consists of parcels, and the case when it consists of bundles of flat mail.
 - f. Assume a pallet loaded with bundles of presorted flats has been placed in a pallet dumper, the shrinkwrap used to secure the pallet has been partly removed, and the employee operating the "dumper" is intercepted by the IOCS clerk while he/she begins to dump a portion of the pallet contents onto a belt. Please explain how this pallet and its contents will be recorded. Please answer this question also in the cases where the pallet load, instead of flats bundles, consists of: (1) sacks with mail in them; (2) empty sacks; (3) trays with letter mail; (4) empty trays; or (5) parcels.
 - g. Please answer the question in part f of this interrogatory also when the reference is to a postal pak, rather than to a pallet.
 - h. Please answer the question in part f of this interrogatory also when the reference is to a hamper, rather than to a pallet.

TW/USPS-T2-3 Please refer to your answers to TW/USPS-T17-14a, c and d, to TW/USPS-T17-15 and to TW/USPS-T2-1-2. Please confirm each of the following or, if not confirmed, please explain.

- a. When an employee observed by an IOCS clerk is handling an empty pallet, he/she will always be recorded as handling an empty pallet.
- b. If an employee were observed handling the same pallet when loaded with mail or with empty items he could, depending on the circumstances, be recorded as handling either a pallet, or "multiple items not in a container," or a postal pak.
- c. All volume variable costs associated with tallies showing handling of empty pallets will be distributed to subclasses, under the current USPS methodology, based on the direct costs from direct tallies showing the handling of pallets.
- d. No volume variable costs associated with tallies showing handling of empty pallets will be distributed to subclasses, under the current USPS methodology, based on the direct costs from direct tallies showing the handling of "multiple items not in a container" or of postal paks.

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 23, 2000