

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

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY TO INTERROGATORIES OF  
TIME WARNER, INC. -- ERRATA  
(TW/USPS-T10-1, 6)

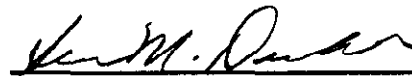
The United States Postal Service hereby provides revised pages to the responses of witness Kingsley to the following interrogatories of Time Warner, Inc.: TW/USPS-T10-1 and 6. The unrevised response to number 1 was filed on March 24, 2000. The revised response changes one number in subpart (d)(2), in which "PS-06" is corrected to read "PS-05." The other two pages are unchanged. The original response to number 6 was filed on April 5, 2000. There is, in fact, no change to that response, but a better quality copy has been substituted for the attachment, causing the one-page original attachment to become a two-page, larger print, attachment.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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April 10, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF TIME WARNER INC.**

incoming secondary mail to carrier routes due to scheme knowledge

requirements, they would be PS-06. I am told that the FY 99 labor rates, fully loaded with service wide costs, are \$10.77, \$25.47, \$29.47, and \$30.97 for Casual, PS-04, PS-05, and PS-06, respectively.

- b. Yes, the answer applied to barcoded flats on both the FSM 881 and the FSM 1000.
- c. Pay depends on the pay level (e.g. Casual, PS-04, PS-05, or PS-06) of the clerk assigned. A higher level clerk can perform lower level work.
- d. (1) Manual flat clerk without scheme knowledge is a PS-05.  
(2) Manual flat clerk with scheme knowledge is a PS-05.  
(3) OCR (FSM or MLOCR) clerk is a PS-04.  
(4) BCR (FSM or BCS) clerk is a PS-04.
- e. No. The Casual or PS-04 clerk would not have the skills necessary to key non-barcoded flats. If the clerk was trained and had passed the qualification test, they would be paid as a PS-05 or PS-6, depending on the training as described in "a" above.
- f. In your hypothetical situation, a couple different scenarios could occur. The PS-04 FSM crew may be scheduled to leave at 4 am if the barcoded volume available to work is to be completed by this time on a regular basis. A PS-04 clerk can also work on any automation equipment and might be assigned to a DPS operation, since DPS generally runs later into the morning than incoming secondary. If the flats are already sorted to 5-digits, are time sensitive, and this is the only FSM crew, the mail could either be worked by manual scheme

### APPENDIX F : SPBSFS 37 BUY SITE SPECIFIC SAVINGS

FIRST COLUMN SHOWS WHETHER FINAL AREA RESPONSES ARE REFLECTED.  
 COLUMNS B-G ARE FROM SPBS-46 & SPBS-54 BUY DARS. FIELD UPDATES ARE NOTED IN COL. D & RELATED FOOTNOTES.  
 COLUMNS H,M & N SHOW FIELD RESPONSES TO AREA 9/22/98 SAVINGS OFFER, REVISED 10/1/98  
 COLUMNS I & J REFLECT FIELD INPUT TO 9/2/98 SAVINGS SURVEY  
 COLUMN O REPORTS WHETHER COLUMN L FIGURES PROVIDE AN ECONOMICAL MACHINE.  
 COLUMNS P-S SHOW AREA PROCESSING OF FIELD RESPONSES. HIGHEST SAVINGS WILL BACKFILL THE THE 230-SPBS BUY. SEE NOTE 7.  
 COLUMN T SHOWS SAVINGS FOR UNASSIGNED MACHINES

F	B	C	D	E	F	G	H	I	J	K	L=I+K	M	N	O	P	Q	R	S	T
FINAL	SPBS BUY #	SPBS BUY	SPBSFS DEPLOY SITE/MACH#	AREA	# INDUCT STA.	daily total SPBS RUN.HRS	Daily sack SPBS RUN.HRS	SACK RUN ANNUAL SAVINGS	Daily NON-SACK SPBS RUN.HRS	NON-SACK RUN ANNUAL SAVINGS	TOTAL ANNUAL SAVINGS	YES/NO AREA/SPBS SAVED/7	YES/NO SPACE AVAILABLE 7	ECONOMICAL MACHINE 7 (R)	PROJECT BUDGETED SAVINGS	#	CONTRIBUTES TO 37-DAR (7)	CONTRIBUTES TO 37-DAR (7) BUDGETED	CONTRIBUTES TO 37-DAR (7) NOT-BUDGETED
X	5	46			6	20	2	572	18.0	15,444	16,016	YES	YES	YES 20%+	16016	1	16016		
X	72	54			6	20	5	1,430	15.0	12,870	14,300	YES	NU P&D	YES 20%+	14300	2	14300		
X	6	46			6	20	5	1,430	15.0	12,870	14,300	YES	NU P&D	YES 20%+	14300	3	14300		
X	59	54			6	20.0	6.0	1,716	14.0	12,012	13,728	YES	YES	YES 20%+	13728	4	13728		
X	1	46			6	18.0	4.0	1,144	14.0	12,012	13,156	YES	YES	YES 20%+	13156	5	13156		
X	25	46			6	18.0	4.0	1,144	14.0	12,012	13,156	YES	YES	YES 20%+	13156	6	13156		
X	4	46			6	20	6	2,266	12.0	10,296	12,564	YES	YES	YES 20%+	12564	7	12564		
X	21	46			6	14	1	266	13.0	11,154	11,440	YES	TBD	YES 20%+	11440	8	11440		
X	7	46			6	16.0	5.0	1,430	11.0	9,438	10,868	YES	YES	YES 20%+	10868	9	10868		
X	51	54			6	14.0	2.1	601	11.9	10,201	10,801	YES	YES	YES 20%+	10801	10	10801		
X	48	54			6	13.9	2.0	572	11.9	10,211	10,783	YES	YES	YES 20%+	10783	11	10783		
X	13	46			4	20	2	266	18.0	10,296	10,562	YES	YES	YES 20%+	10562	12	10562		
X	2	46			6	13.0	1.0	266	12.0	10,296	10,562	YES	YES	YES 20%+	10562	13	10562		
X	80	54			4	20.0	2.0	266	18.0	10,296	10,562	YES	YES	YES 20%+	10562	14	10562		
X	75	54			6	13.7	4.0	1,144	9.7	8,350	9,494	YES	YES	YES 20%+	9494	15	9494		
X	93	54			6	13.7	4.0	1,144	9.7	8,330	9,474	YES	YES	YES 20%+	9474	16	9474		
X	34	46			6	15.0	6.0	1,716	9.0	7,722	9,438	YES	YES	YES 20%+	9438	17	9438		
X	60	54			6	12.8	3.0	658	9.8	8,420	9,278	YES	YES	YES 20%+	9278	18	9278		
X	61	54			6	12.8	3.0	658	9.8	8,420	9,278	YES	YES	YES 20%+	9278	19	9278		
X	78	54			4	20.0	6.0	666	14.0	8,006	8,666	YES	YES	YES 20%+	8666	20	8666		
X	29	46			6	13.0	4.0	1,144	9.0	7,722	8,666	YES	YES	YES 20%+	8666	21	8666		
X	#	46			6	12.91	4.0	1,144	8.9	7,648	8,792	YES	YES	YES 20%+	8792	22	8792		
X	82	54			4	17	2	266	14.7	8,381	8,667	YES	TBD	YES 20%+	8667	23	8667		
X	41	48			6	11.0	1.5	428	9.5	8,151	8,580	YES	YES	YES 20%+	8580	24	8580		
X	92	54			6	12	3	658	9.0	7,705	8,563	YES	YES	YES 20%+	8563	25	8563		
X	78	54			4	18.4	5.0	715	13.4	7,641	8,356	YES	YES	YES 20%+	8356	26	8356		
X	66	54			4	16.8	3.0	429	13.8	7,886	8,315	YES	YES	YES 20%+	8315	27	8315		
X	60	54			6	11	2	572	8.91	7,837	8,209	YES	YES	YES 20%+	8209	28	8209		
X	83	54			4	18.0	5.0	715	13.0	7,436	8,151	YES	YES	YES 20%+	8151	29	8151		
X	3	46			6	12	4	1,144	8.0	6,864	8,008	YES	YES	YES 20%+	8008	30	8008		
X	10	46			6	10.0	1.0	266	8.0	7,722	8,008	YES	YES	YES 20%+	8008	31	8008		
X	17	46			6	20	16	4,576	4.0	3,432	8,008	YES	YES	YES 20%+	8008	32	8008		
X	79	54			4	20.0	9.0	1,287	11.0	6,292	7,579	YES	YES	YES 20%+	7579	33	7579		
X	71	54			6	14	7.9	2,250	6.1	5,281	7,512	YES	YES	YES 20%+	7512	34	7512		
X	74	54			4	16.8	5.0	715	11.8	6,746	7,461	YES	YES	YES 20%+	7461	35	7461		
X	35	46			6	12	5	1,430	7.0	6,006	7,436	YES	YES	YES 20%+	7436	36	7436		
X	91	54			4	12.9	0.5	72	12.4	7,086	7,156	YES	YES	YES 20%+	7156	37	7156		
X	73	54			6	9.0	1.0	266	8.0	6,864	7,150	YES	YES	YES 20%+	7150	38	7150		
X	14	46			4	13.0	1.0	143	12.0	6,864	7,007	YES	YES	YES 20%+	7007	39	7007		
X	30	46			4	13.0	1.0	143	12.0	6,864	7,007	YES	YES	YES 20%+	7007	40	7007		
X	68	54			6	10.7	4.0	1,144	8.7	5,782	6,906	YES	YES	YES 20%+	6906	41	6906		
X	8	46			6	10.0	3.0	658	7.0	6,006	6,864	YES	YES	YES 20%+	6864	42	6864		
X	90	54			4	12.4	1.0	143	11.4	6,545	6,688	YES	YES	YES 20%+	6688	43	6688		
X	37	46			4	12.0	0.5	72	11.5	6,578	6,650	YES	YES	YES 20%+	6650	44	6650		
X	11	46			5	11.0	5.0	1,430	8.0	5,148	6,578	YES	YES	YES 20%+	6578	45	6578	6578	
X	12	46			6	9.0	2.0	572	7.0	6,006	6,578	YES	YES	YES 20%+	6578	46	6578	6578	
X	69	54			6	12.1	6.7	1,916	5.4	4,654	6,570	YES	YES	YES 20%+	6570	47	6570	6570	
X	49	54			6	11.4	5.8	1,858	5.8	4,798	6,457	YES	YES	YES 20%+	6457	48	6457	6457	
X	87	54			6	10.8	5.0	1,430	5.8	4,937	6,367	YES	YES	YES 20%+	6367	49	6367	6367	
X	56	54			4	20	12	1,716	8.0	4,576	6,292	YES	TBD	YES 20%+	6292	50	6292	6292	

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X	28	48	6	10.0	4.0	1,144	6.0	5,148	6,292	YES	YES	YES 20%+	6292	61	6292
X	26	48	6	8	1	1,288	7.0	6,008	6,292	YES	YES	YES 20%+	6292	62	6292
X	53	54	6	13.2	9.0	2,574	4.2	3,633	6,207	YES	YES	YES 20%+	6207	63	6207
X	81	54	4	13.2	3.3	472	9.9	8,689	6,161	YES	YES	YES 20%+	6161	64	6161
X	15	46	4	11.0	0.5	72	10.5	6,008	6,078	YES	YES	YES 20%+	6078	65	6078
X	18	46	6	8.0	4.5	1,429	8.5	5,577	6,008	YES	YES	YES 20%+	6008	66	6008
X	42	46	4	12.0	2.0	266	10.0	5,720	6,006	YES	YES	YES 20%+	6006	67	6006
X	52	54	6	13.6	10.0	2,660	3.6	3,128	6,966	YES	YES	YES 20%+	5966	68	5966
X	66	54	6	7.9	1.5	429	6.4	5,527	5,958	YES	YES	YES 20%+	5958	69	5958
X	96	54	4	11	2.1	143	9.8	6,497	6,640	YES	YES	YES 20%+	6640	70	6640
X	23	46	4	12.0	3.0	429	9.0	5,148	5,577	YES	YES	YES 20%+	5577	81	5577
X	55	54	4	20.0	14.0	2,002	6.0	3,432	5,434	YES	YES	YES 20%+	5434	82	5434
X	47	54	6	18.9	18.9	5,405	0.0	0	5,405	YES	YES	YES 20%+	5405	83	5405
X	24	46	4	12	4	515	8.4	4,866	5,320	YES	YES	YES 20%+	5320	84	5320
X	18	46	4	12.0	4.0	572	6.0	4,576	5,148	YES	YES	YES 20%+	5148	85	5148
X	32	46	4	9.0	0.5	72	8.5	4,862	4,934	YES	YES	MARGINAL 10-20%	4934	86	4934
X	64	54	6	17.2	17.2	4,919	0.0	0	4,919	YES	YES	MARGINAL 10-20%	4919	87	4919
X	84	54	4	11.8	4.8	688	7.0	4,019	4,705	YES	YES	MARGINAL 10-20%	4705	88	4705
X	27	46	5	8.0	4.0	1,144	4.0	3,432	4,576	YES	YES	MARGINAL 10-20%	4576	89	4576
X	36	46	4	9.0	2.0	266	7.0	4,004	4,290	YES	YES	MARGINAL 10-20%	4290	70	4290
X	67	54	4	16.1	12.0	1,716	4.1	2,331	4,047	YES	TBD	MARGINAL 10-20%	4047	71	4047
X	38	46	4	10.0	4.0	572	6.0	3,432	4,004	YES	YES	MARGINAL 10-20%	4004	72	4004
	58	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	74	5749
	63	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	75	5749
	77	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	76	5749
	66	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	77	5749
	57	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	78	5749
	62	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	79	5749
	85	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	80	5749
	40	46	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	81	5749
	89	54	6	12.9	9.3	2,660	3.6	3,089	5,749			YES 20%+	5749	82	5749

NOTES:

2 - RUNTIME CHANGED FROM 6.0 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR	3 - RUNTIME CHANGED FROM 7.0 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR
4 - ALREADY INSTALLED AS OF 9/98	5 - SPBS WAS UPGRADED FROM DAR QUANTITIES
6 - RUNTIME CHANGED FROM 3 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR	7 - 44 MACHINES WILL BACKFILL THE 230-DAR SCHEDULE. PER JOB, LUCHINS 8/14/98 SCHEDULE: 230 230-DAR & ISC-AUTHORIZED MACHINES 146 ISC/OTHER COMPLETED INSTALLS 46 ISC/OTHER PENDING INSTALLS 44
8 - RUNTIME CHANGED FROM 9.0 HR FIGURE (APPARENTLY) RECEIVED FROM SPBS-46 BUY DAR	9, 10 - BK HRS WERE ADJUSTED FROM ZERO (0) TO FUND SPBS1 SAVINGS FOR 2ND SPBS WITH INTERM SPBS1
11 - DEFAULT VALUE, TO SITES WITH SPBS SITES REPLACING INTERM SPBS1S OR MANAGEMENT ACCEPTS SPBS1S	12 - RUNTIME CHANGED FROM SPBS-DAR COMMITMENT TO CORRESPONDING FACILITY-DAR COMMITMENT
1 - DAR SAVINGS FOR FS for unassigned SPBS from the SPBS-46 & 54 buys will be offered at 12.9 run-tradoff (302 op days) = 2660 hrs/yr, @ state. From SPBS1 DAR, BK HRS WERE CALCD FROM AVG SAVINGS ASSIGNED BITES THIS DAR.	

TOTAL	157,825	51,737	209,562
COUNT	28	9	
AVG	5637	5749	

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DECLARATION

I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley  
Date: 4-10-00

## 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.

  
\_\_\_\_\_  
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