

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
WITNESS KINGSLEY TO INTERROGATORY OF
ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T10-11)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Association for Postal Commerce: POSTCOM/USPS-T10-11, filed on March 27, 2000.

The 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



Susan M. Duchek

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April 10, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE**

POSTCOM/USPS-T10-11 . Please refer to your response to TW/USPS-T10-1(a) where you provide FY 99 labor rates individually for Casual, PS-04, PS-05, and PS-06 clerks.

- (a) Please provide average Test Year fully-loaded labor rates individually for Casual, PS-04, PS-05, and PS-06 clerks.
- (b) Please provide FY 1999 work hours individually for Casual, PS-04, PS-05, and PS-06 clerks.
- (c) Please provide projected Test Year work hours individually for Casual, PS-04, PS-05, and PS-06 clerks.
- (d) Are Casual clerks qualified to do all work that PS-04 clerks are qualified to do? If not, please describe all work that PS-04 clerks are qualified to do, but Casuals are not qualified to do.

RESPONSE:

- a. I am told that the FY 2001 projected national average labor rates for clerks, fully loaded with service wide costs are:
 - Casual - \$11.49
 - PS-04 - \$27.41
 - PS-05 - \$31.41
 - PS-06 - \$32.93
- b. I am told that FY 99 clerk casual hours were 14,500,267 and clerk hours were 538,170,739, but a breakout of clerk hours by level is not available.
- c. I am told that FY 2001 projected clerk-casual and clerk hours may be found in LR-I-127, Chapter 10, but a breakout of projected clerk hours by level is not available.
- d. Not necessarily. Although a clerk-casual can theoretically be assigned to any job that that a PS-04 clerk can do, the tenure limitations on a casual may make it

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uneconomical to give a casual the training a clerk might receive. For example, it would be unusual to see a casual keying mail in a CFS unit or for the new AFSM-100.

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: 4-10-2000

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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