

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 INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T10-12-13)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Association for Postal Commerce: POSTCOM/USPS-T10-12-13, filed on April 17, 2000.

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



Susan M. Duchek

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May 1, 2000

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

POSTCOM/USPS-T10-12 Please refer to your response to Postcom/USPS-T10-11, where you state, "a breakout of clerk hours by level is not available."

(a) Please provide the number of PS-4 clerks that currently work for the Postal Service. If not available, please provide the number of PS-4 clerks that worked at the Postal Service for the most recent time period where data are available.

(b) Please provide the number of PS-5 clerks that currently work for the Postal Service. If not available, please provide the number of PS-5 clerks that worked at the Postal Service for the most recent time period where data are available.

(c) Please provide the number of PS-6 clerks that currently work for the Postal Service. If not available, please provide the number of PS-6 clerks that worked at the Postal Service for the most recent time period where data are available.

Response:

(a) As of April 7, 2000, (the latest data available), the number of PS-4 clerks is 52,540.

(b) As of April 7, 2000, (the latest data available), the number of PS-5 clerks is 214,487.

(c) As of April 7, 2000, (the latest data available), the number of PS-6 clerks is 45,172.

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

POSTCOM/USPS-T10-13 Please refer to your response to Postcom/USPS-T10-11, where you state, "Although a clerk-casual can theoretically be assigned to any job that a PS-04 can do, the tenure limitations on a casual may make it uneconomical to give a casual the training a clerk might receive."

(a) Do casuals perform any activities that PS-4s are not qualified to do, but PS-5s and PS-6s are qualified to do. If so, please provide a list of all such activities.

Response:

The short tenure of the casual appointment does not make it cost effective to train and qualify casuals on operations for which career employees are not qualified.

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: 5-1-2000

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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