

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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
TIME WARNER, INC. WITNESS STRALBERG
(USPS/TW-T1-1-8)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Time Warner, Inc. witness Stralberg: USPS/TW-T1-1-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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June 2, 2000

USPS/TW-T1-1. On page 28 of your testimony, lines 1-2, you say that “some of the mail unloaded may be ‘direct’ containers, including pallets, that simply need to be cross-docked and staged for loading onto outbound trucks. This activity takes little time.” [emphasis added]

- a) What is the basis for this conclusion? Please cite all studies you have conducted or reviewed regarding the costs of cross-docking ‘direct’ containers.
- b) What is your understanding with respect to the average length of travel for cross-docked direct containers as compared to the average length of travel for containers being moved to opening units and sorting operations?
- c) Have you ever observed the staging of cross-docked containers inside the plant due to insufficient dock space?
- d) Has dock space at plants increased in proportion to cross-docked ‘direct’ containers?
- e) Has the staging of cross-docked direct containers added to the congestion of the dock area?
- f) What impact have the additional forklifts needed to move cross-docked pallets had on the level of congestion on the dock?

USPS/TW-T1-2. On page 28 of your testimony, lines 13-16, you say that “What defines the time constraints, however, and requires initial bursts of

activity to get the mail unloaded and started on its processing, and later more burst of activity to meet dispatch schedules, is the 'working mail' that is separated from the direct mail in the opening units."

- a) Is it your contention that there would be no exigency to unload or load a truck that would only contain 'direct' containers of mail?
- b) Please reconcile your conclusion that working mail alone creates the bursts of activity on the platform with the testimony of witness Degen (USPS-T-16) at page 50, lines 11-12 where he describes the limited unloading and loading time required to keep the trucks on schedule.

USPS/TW-T1-3. If a forklift picks up a pallet and moves it from point A to point B, then returns to point A with nothing on its forks, what proportion of the time would that forklift driver be observed not-handling mail?

USPS/TW-T1-4. If a platform worker is waiting for a truck, what portion of that waiting time would we expect to observe him/her handling mail?

USPS/TW-T1-5. On page 29 of your testimony, lines 14-16, you say that "As illustrated above, 'allied' operations in MODS facilities incur very large 'not-handling' costs, in spite of being much less automated than the piece distribution operations they support."

- a) Please indicate the approximate amount of time that you believe workers clocked into platform operations should be observed not handling mail.
- b) What does being less automated than piece distribution operations have to do with the expected amount of not-handling time in platform and other allied operations?
- c) Do you mean to imply that allied operations have the same essential nature as piece sortation operations, except that they are less automated? If your answer is yes, please indicate the piece distribution counterpart to waiting for trucks.

USPS/TW-T1-6. On page 29, lines 2-8, you say that "'working mail' drives the need for high staffing levels in allied operations" and that "this mail is most responsible for the extensive amounts of 'not-handling'." Please specify the mail processing cost pools corresponding to your use of the term 'allied operations.'

USPS/TW-T1-7. On page 29, lines 9-10, at the end of section C of your testimony, you say "These observations bear directly on the question of how to distribute allied 'not-handling' and 'mixed mail' costs." Please indicate how the observations you make in section C of your testimony bear on the issue of mixed mail costs.

USPS/TW-T1-8. On page 4, lines 3-6 of your testimony you say that "In visits to postal facilities in the preceding years I had become concerned that the rapid move to letter automation would lead to claims of great savings, which the Postal Service would only be able to justify by reporting higher costs for non-automated mail." Please list the changes that the Postal Service has made to the CRA methodology that have led to "reporting higher costs for non-automated mail." Please be specific with respect to the changes and your reasoning as to why each change has reduced the CRA costs for automated mail, while increasing the costs for non-automated mail.

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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