

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
TIME WARNER, INC. WITNESS STRALBERG
(USPS/TW-T1-16-18)

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-T1-16-18.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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June 14, 2000

USPS/TW-T1-16. Please refer to your testimony at page 26, footnote 20. You state that Periodicals are “the first to be moved to annexes.” Please describe fully the basis for your statement. Please provide detailed citations to studies and/or reports, and describe in detail and provide any other data and/or analysis, that you use to support your position.

USPS/TW-T1-17. Please refer to your testimony at page 27, lines 2-4. You state, “Furthermore, because productivity at allied operations generally is not monitored, it is probable that employees are often assigned to them when they are not needed elsewhere.”

a. Please explain your use of the term “probable” in the statement quoted above.

Specifically, does it indicate speculation on your part as to whether, or to what extent, employees “not needed elsewhere” are assigned to allied operations?

Please explain.

b. Please specify the non-allied labor activities or operations you believe to have (or generate) the surplus labor or employees you reference in the quoted statement.

Please cite all studies, reports, and/or data that support your answer.

c. Please specify the allied labor activities or operations to which you believe the surplus labor or employees you reference in the quoted statement are assigned.

Please cite all studies, reports, and/or data that support your answer.

USPS/TW-T1-18. Please refer to your testimony at page 20, lines 20-22. You make a claim of "the system's tendency always to allocate more costs to the least automated mail."

- a. Please specify whether the antecedent of "the system" is IOCS or the Postal Service's mail processing costing system as a whole.
- b. Would you expect the "least automated mail" to be more costly to process, other things held equal, than more automated mail? Please explain fully any negative response.
- c. Do you contend that the "tendency" to which you refer in the quoted statement is equally strong for every mail processing cost pool? Please explain fully.

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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