

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

Docket No. R2001-1

INTERROGATORIES OF AOL TIME WARNER INC.
TO THE UNITED STATES POSTAL SERVICE (AOL-TW/USPS-1-8))
(October 2, 2001)

Pursuant to sections 25 and 26 of the Rules of Practice, AOL Time Warner Inc. (AOL Time Warner) directs the following interrogatories to the United States Postal Service.

Respectfully submitted,



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INTERROGATORIES TO UNITED STATES POSTAL SERVICE

AOL-TW/USPS-1 Please provide, for each MODS 3-digit code under LDC 11, LDC 12, LDC 13 and LDC 14, the following statistics for FY2000:

- a. recorded clerk and mailhandler manhours;
- b. pieces handled (TPH);
- c. pieces fed (TPF); and
- d. first handling pieces (FHP)

If some of the information listed above is already included in this filing, please provide the proper references. Please provide all information in an electronic spreadsheet format.

AOL-TW/USPS-2 Please provide, for each MODS 3-digit code under LDC 11, LDC 12, LDC 13 and LDC 14, the following aggregate statistics for FY2001:

- a. recorded clerk and mailhandler manhours;
- b. pieces handled (TPH);
- c. pieces fed (TPF); and
- d. first handling pieces (FHP)

If this information is not available for all of FY2001, please provide it for the accounting periods in FY2001 for which it is available. Please provide all information in an electronic spreadsheet format.

AOL-TW/USPS-3 Does the Postal Service, either from its regular data collection systems, a special survey or any other source, have information on the volume of flats, letters and parcels that are piece sorted in Function 4 operations LDC 41, LDC 42, LDC43 and LDC 44? If yes, please provide this information per shape and LDC code and explain how it was obtained. If possible, please provide such information both for FY2000 and FY2001.

AOL-TW/USPS-4 Does the Postal Service, either from its regular data collection systems or from a special survey, or from any other source, have information on the number of workhours spent sorting, respectively, flats, letters and parcels in Function 4 operations LDC 41, LDC 42, LDC43 and LDC 44? If yes, please provide this information per shape and LDC code and explain how it was obtained. If possible, please provide such information both for FY2000 and FY2001.

AOL-TW/USPS-5 Please list all MODS codes that are associated with the AFSM-100 machines. Please also explain the type of processing (sort schemes, etc.) that is described by each MODS code.

AOL-TW/USPS-6

- a. Please confirm that in facilities using AFSM-100 machines, "prepping" of flats for piece sorting is normally performed in a separate operation, and not by the AFSM-100 crew.
- b. What MODS codes may be used to record the "prepping" of flat mail prior to sorting, and what are the circumstances under which each MODS code is used?
- c. Under what circumstances is MODS code 035 used to record prepping of flat mail, and when did the use of MODS code 035 for this purpose begin?
- d. Under what circumstances is the "prepping" of flats performed by, respectively, clerks and mailhandlers?
- e. Is it normal in facilities using AFSM-100 machines that all flats that require piece sorting are "prepped" in essentially the same manner regardless of which machine they eventually will be sorted on? If no, please explain how facilities differentiate between flats for different sorting modes in the "prepping" stage.
- f. When flats are to be sorted in a facility using AFSM-100 and FSM-1000 machines, at what point, by whom and based on what criteria is the decision made as to which machine a given flat will be sent to?

AOL-TW/USPS-7 Please explain as follows regarding the Video Coding System (VCS) of the AFSM-100:

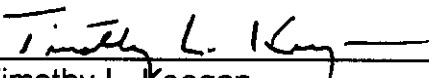
- a. Which MODS codes are used to record workhours at the VCS? If more than one code can be used, please explain when each is used.
- b. Are employees at the VCS considered part of the AFSM-100 crew?
- c. How many VCS operators are needed per AFSM-100 machine in order to be able to key all the flats whose image is lifted from the AFSM-100? If the answer depends on the type of mail being processed on the AFSM-100, then please explain how the mail characteristics affect the need for VCS operators.

- d. How many VCS operators are typically assigned per AFSM-100 during the hours when the machine is in operation? If the answer differs depending on time of day, please explain how.
- e. What is the typical craft/pay level for VCS operators?
- f. Is mail volume information captured for the VCS? If yes, what can be said based on the data collected so far regarding: (1) the percentage of flats whose image is lifted to the VCS; (2) the percent of these flats that are successfully coded and are able to continue in the AFSM-100 mailstream; and (3) the impact of various mail characteristics (e.g., class) on the need for VCS coding?

AOL-TW/USPS-8 Has the Postal Service collected any statistics on the frequency of jams at AFSM-100 feeder stations, the impact of such jams on machine productivity, or the mail characteristics and other factors that are likely to cause jams? If yes, please provide the findings from all such analyses.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.



Timothy L. Keegan

October 2, 2001