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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001–1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF AOL TIME WARNER (AOL-TW/USPS–1-8)

The United States Postal Service hereby provides its responses to the following interrogatories AOL Time Warner: AOL-TW/USPS–1-8, filed on October 2, 1001. We are providing a diskette containing the electronic spreadsheets as requested in interrogatories 1 and 2.

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

Frank Heselton

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–{attorney's phone} Fax –5402
October 16, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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 (sic);

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.

Response:

See attached spreadsheet.

FY 2000

LDC	OPER	Work Hours	FHP (000)	TPH (000)	TPF (000)
11	046	94,021	318,290.3	115,863.6	707,939.1
11	047	35,309	(2,455.0)	332,585.1	433,953.1
11	241	78	-	-	-
11	242	4	-	-	-
11	243	31	-	-	-
11	244	39	-	-	-
11	245	4	-	-	-
11	246	38	-	-	-
11	247	(2)	-	-	-
11	250	12	-	3.8	3.8
11	251	12	-	-	-
11	261	185,630	977,920.9	1,351,673.6	1,750,239.7
11	262	819	391.2	53,541.0	67,523.4
11	263	12,488	15,814.1	76,820.8	92,487.4
11	264	14,658	122,856.4	204,127.8	229,753.3
11	265	3,239	3,424.2	33,095.3	35,646.0
11	266	(3,440)	(45.5)	74,495.2	78,653.0
11	267	4,306	26.2	7,995.7	9,210.6
11	271	1,391,629	4,328,329.2	14,339,543.7	17,048,208.1
11	272	40,409	65,499.9	801,982.8	949,217.0
11	273	55,388	33,618.8	710,187.1	820,060.9
11	274	20,353	23,523.9	275,370.2	311,179.8
11	275	12,531	2,829.0	70,150.1	84,601.9
11	276	254	5,504.0	22,499.3	24,207.8
11	277	1	12.4	12.2	12.3
11	278	80	-	865.8	877.7
11	279	14	-	812.0	819.7
11	281	21,177	87,595.8	168,048.3	272,401.0
11	282	90	-	-	-
11	283	2,556	1,303.6	11,860.5	17,987.7
11	284	1,894	5,931.8	16,456.1	19,525.7
11	285	332	10.3	1,124.1	1,842.1
11	291	4,286	43,315.8	101,719.1	303,499.6
11	292	1,053	12.7	617.3	733.3
11	293	120	122.9	223.5	7,016.9
11	294	8	127.4	1,974.8	2,721.6
11	295	22	34.4	202.8	365.1
11	296	5	-	152.9	187.6
11	297	(3)	6.3	-	-
11	299	20	-	-	-
11	301	16,726	61,205.9	7,294.3	89,003.0
11	302	1,415	75.9	-	-
11	303	50,033	256,192.6	103,082.0	356,567.9
11	304	117	(7.1)	-	-
11	309	1,556	1,459.9	1,358.4	9,332.1
11	311	3,304	3.5	36,122.1	42,403.3
11	312	10,107	140,908.1	39,077.7	43,699.0

11	313	20,353	5,494.9	112,467.2	136,876.8
11	314	6,631	13,032.8	37,010.2	45,234.6
11	315	31,221	(66.8)	84,440.8	115,017.5
11	316	273	-	2,018.6	2,363.9
11	317	34,740	644.6	160,795.6	236,872.2
11	318	495	112.9	23,634.1	24,859.2
11	319	629	5,053.9	2,969.1	13,528.8
11	356	567	14,302.9	2,313.5	8,538.9
11	357	2,322	20,034.8	4,769.5	13,953.3
11	603	277	-	-	-
11	831	231,927	773,073.9	455,801.9	639,773.3
11	832	31,381	29,809.8	251,744.8	331,944.0
11	833	129,839	335,036.2	215,357.5	273,576.1
11	834	443,224	573,086.9	1,644,171.7	1,980,811.5
11	835	233,644	283,156.8	785,082.7	968,860.4
11	836	197,131	25,872.7	1,692,888.4	1,910,835.9
11	837	41,928	38,906.9	78,319.1	91,422.7
11	841	169,469	240,040.3	699,456.8	1,074,014.2
11	842	31,092	54,296.3	170,122.5	223,563.7
11	843	138,176	262,724.2	436,754.4	632,830.0
11	844	192,620	363,255.2	826,748.5	1,119,639.1
11	845	69,135	159,036.5	360,833.0	479,299.3
11	846	62,961	48,606.7	276,773.3	331,690.0
11	847	363	192.4	1,526.1	1,792.9
11	851	9,601	6,258.1	1,559.6	3,221.6
11	852	1,530	339.8	1,957.2	2,642.6
11	853	2,071	1,307.8	1,302.9	1,866.0
11	854	14,366	1,037.6	245.6	324.0
11	855	150	314.1	95.1	115.5
11	856	50	1,067.2	-	-
11	857	87	-	-	-
11	861	6,635	25,026.4	9,668.2	48,546.4
11	862	3,062	6,601.6	47,954.3	72,023.7
11	863	26,483	78,075.1	86,475.6	171,816.1
11	864	36,275	108,965.1	395,037.7	440,544.8
11	865	15,138	43,233.2	185,486.6	220,679.7
11	866	56,882	10,470.3	647,144.1	698,157.9
11	867	1,547	30.9	68,034.8	73,179.5
11	868	242	(0.3)	2,836.8	2,938.6
11	869	634	-	2,099.3	2,114.1
11	871	411,701	1,172,797.8	594,595.5	634,429.3
11	872	146,539	374,175.7	1,144,821.9	1,190,423.8
11	873	993,072	6,025,009.6	4,793,241.9	5,058,250.8
11	874	2,342,242	13,239,211.4	12,115,252.2	12,675,153.5
11	875	969,039	5,490,834.2	5,009,199.5	5,253,462.3
11	876	2,185,442	4,003,350.2	7,347,164.4	7,674,887.8
11	877	79,503	118,063.0	958,328.1	982,818.5
11	878	203,948	737,298.5	1,075,643.0	1,104,763.0
11	879	72,818	56.1	839,405.7	853,416.9
11	881	4,244,423	25,900,672.7	19,344,543.1	26,329,551.1
11	882	41,583	79,127.8	54,066.2	95,635.6
11	883	1,167,849	2,463,085.1	2,592,955.6	3,890,874.8
11	884	729,679	1,807,376.5	2,409,982.3	3,000,607.2

11	885	421,285	801,217.7	1,032,326.7	1,331,602.4
11	886	13,971	14,507.1	26,763.3	31,265.0
11	887	1,783	733.3	1,460.7	2,345.3
11	891	2,488,458	13,433,257.2	14,926,305.0	15,685,101.6
11	892	1,434,399	2,698,967.7	11,173,718.8	11,628,548.9
11	893	4,503,261	21,630,550.5	23,826,273.7	24,737,031.2
11	894	3,552,396	18,885,343.8	20,082,630.9	20,815,381.6
11	895	1,601,004	8,628,434.4	10,915,247.3	11,318,227.1
11	896	2,871,660	6,696,940.1	17,451,792.9	18,214,664.9
11	897	329,229	460,488.2	3,412,763.9	3,493,840.8
11	898	852,130	1,328,633.4	2,662,690.2	2,724,396.8
11	899	138,381	229.0	1,884,622.3	1,911,484.4
11	905	-	-	1,914.4	-
11	908	206	(1.4)	11,568.9	12,836.7
11	909	2,400	1.0	-	-
11	910	162	157.5	11,587.9	11,880.3
11	911	3,144	15,639.6	200,157.7	201,017.0
11	912	-	-	332.8	-
11	913	-	-	211.0	-
11	914	12,617	1,995.0	238,864.3	244,928.8
11	915	3,571	82.6	182,753.7	187,913.0
11	916	4,288	6,595.9	53,491.0	54,950.9
11	917	1,147	327.2	39,459.8	40,441.1
11	918	9,944,776	17,514,724.3	64,325,302.1	65,946,976.2
11	919	3,326,001	1,667.3	55,072,342.4	55,924,201.6
11	925	6,130	88.8	-	-
11	926	194	9.2	-	-
11	971	1,468,180	4,432,671.1	7,642,692.9	9,254,374.4
11	972	155,915	317,036.7	826,114.3	999,632.8
11	973	299,094	398,253.5	1,887,243.5	2,286,189.4
11	974	177,789	338,319.2	1,235,237.7	1,440,290.8
11	975	119,532	131,335.8	867,143.5	976,323.4
11	976	15,210	68,293.9	306,943.9	320,973.3
11	977	1,425	12,840.4	44,083.2	46,026.5
11	978	3,802	1,778.9	13,864.5	15,512.1
11	979	4,894	5.9	12,558.1	14,591.1
12	081	23,779	2,242.3	21,700.2	25,221.4
12	082	34,020	19,615.1	52,374.4	55,784.1
12	083	36,180	13,419.9	17,060.3	17,599.1
12	084	1,793	525.0	1,307.6	1,615.7
12	085	68	87.1	8.8	8.9
12	086	93	82.7	(6.2)	0.1
12	087	102	(3.1)	-	-
12	088	21	-	-	-
12	089	12	35.9	124.0	124.0
12	090	4,603	10,574.3	4,885.1	4,973.4
12	091	24,027	1,575.0	29,264.0	29,265.1
12	092	38,415	12,490.2	34,034.5	35,275.1
12	093	3,190	4.2	2,435.8	2,435.8
12	094	2,272	448.4	6,551.9	6,551.9
12	095	2,885	68.8	6,326.6	6,326.6
12	096	5,720	428.5	3,636.1	3,636.1
12	097	-	(1.7)	-	-

12	098	67	7.1	-	-
12	099	95	-	-	-
12	141	3,809,767	1,635,818.5	1,966,602.8	1,971,335.2
12	142	398,789	46,473.8	311,015.0	313,847.4
12	143	2,366,907	889,670.7	894,949.2	919,328.2
12	144	2,322,857	773,542.7	1,232,882.4	1,256,916.9
12	145	927,377	278,130.5	486,131.0	487,345.8
12	146	1,718,761	313,960.3	653,328.1	673,576.2
12	147	79,571	4,258.0	39,113.2	56,452.1
12	148	31,844	3,923.8	19,012.3	31,444.9
12	175	-	102.6	-	-
12	190	10	-	-	-
12	191	58	0.9	-	-
12	192	83,368	31,846.3	31,623.9	31,863.9
12	193	10,205	9,765.7	6,435.6	7,051.1
12	194	689	6.6	54.8	65.8
12	195	66	2.4	-	-
12	196	28	1.2	-	-
12	197	17	7.6	-	-
12	305	24,352	9,306.6	8,793.4	8,900.5
12	306	19,961	7,415.8	9,397.8	9,484.6
12	307	114	-	-	-
12	308	71	-	-	-
12	331	87,966	86,508.2	124,629.1	134,221.4
12	332	1,123	78.6	1,323.6	1,600.9
12	333	93,311	77,461.3	132,643.6	146,232.1
12	334	61,885	68,730.0	99,010.3	106,647.5
12	335	26,553	28,187.8	36,964.0	39,589.1
12	336	65,353	79,436.1	122,853.1	135,271.1
12	337	230	504.8	114.4	140.2
12	338	12	-	-	-
12	382	-	-	83.4	-
12	421	1,998,031	1,734,877.2	1,333,319.0	1,653,316.7
12	422	220,675	63,050.0	186,402.6	220,228.4
12	423	2,803,760	1,722,532.1	1,495,348.8	1,826,796.6
12	424	3,283,644	2,584,130.8	2,087,679.5	2,376,478.7
12	425	843,514	760,806.0	509,449.0	587,901.6
12	426	6,981,258	3,991,269.3	4,315,942.2	4,921,562.5
12	427	7,901	3,058.6	6,054.9	7,435.7
12	441	2,709,326	969,657.1	1,562,047.8	1,592,283.0
12	442	404,493	55,280.0	290,274.7	297,592.5
12	443	2,893,128	1,065,430.6	1,417,499.2	1,470,824.8
12	444	3,604,880	1,518,480.7	2,042,076.0	2,090,508.2
12	445	1,083,503	389,086.2	546,116.4	563,024.5
12	446	603,534	239,597.7	387,613.9	396,085.0
12	447	36,966	11,219.0	33,140.4	34,071.0
12	448	28,838	14,634.4	10,686.4	11,949.8
12	450	56,317	50,734.9	19,593.4	19,825.5
12	451	57,527	23,357.6	14,120.6	14,321.6
12	461	59,015	27,142.7	9,317.9	10,183.8
12	462	2,262	119.4	18.2	18.0
12	463	28,699	59,955.0	32,830.3	39,157.3
12	464	112,040	153,439.1	116,762.1	138,387.3

12	465	37,363	35,520.2	24,385.7	29,425.6
12	466	254,931	131,536.1	263,739.1	310,249.0
12	467	610	123.1	198.0	243.7
12	468	-	-	21.9	28.2
12	961	3,907	5,583.6	4,856.5	5,409.3
12	962	1,084	32.3	642.8	782.9
12	963	29,989	83,358.0	17,069.7	19,560.8
12	964	68,869	152,075.6	52,084.8	57,170.5
12	965	17,229	45,047.0	18,992.3	19,410.4
12	966	320,489	302,083.6	148,304.4	160,632.6
12	967	241	322.0	711.0	804.7
13	104	933	67.6	130.4	130.8
13	105	395,806	34,557.6	28,916.8	29,314.8
13	107	116	(4.4)	-	-
13	108	6,786	(0.1)	8.1	8.1
13	134	2,495,661			
13	135	1,134,260			
13	136	3,746,199			
13	137	5,700,299			
13	138	1,831,072	342,151.2	414,030.8	421,766.0
13	139	1,735,331	422,505.2	486,310.2	492,453.8
13	238	1,169,143			
13	239	932,712			
13	254	110,691			
13	255	119,703			
13	256	275,241			
13	257	540,073			
13	258	265,735	41,413.0	47,812.1	47,848.8
13	259	98,070	30,594.6	43,441.4	43,383.5
13	346	188,361			
13	347	134,343			
13	348	-			
13	349	16,207			
13	434	41,239			
13	435	127	-	-	-
13	436	417	-		
13	438	3,222	-	1,510.4	1,510.4
14	029	158,108	172,220.0	183,370.0	-
14	030	14,275,729	4,965,495.3	6,576,189.8	-
14	032	386,329	94,238.2	121,479.7	-
14	033	158,543	42,743.7	50,533.1	-
14	040	3,052,437	244,745.2	1,421,337.5	-
14	043	4,383,499	1,615,478.9	2,304,702.2	-
14	044	6,688,118	2,895,890.6	4,270,019.8	-
14	045	1,345,236	811,757.0	897,828.9	-
14	050	5,458,366	1,147,673.8	1,184,788.0	-
14	055	3,422,516	909,260.6	932,494.2	-
14	060	887,914	337,142.3	375,498.5	-
14	062	42,572	14,802.1	16,426.1	-
14	063	3,785	1,949.6	2,001.8	-
14	069	62,341	50,851.0	50,839.7	-
14	070	311,874	72,167.0	133,009.8	-
14	073	383,747	132,653.6	152,175.0	-

14	074	2,160,849	1,058,517.7	1,158,070.2	-
14	075	279,690	138,817.9	140,175.7	-
14	100	521,226	206,387.4	202,025.4	-
14	102	287,084	13,238.2	13,236.5	-
14	103	112,562	17,169.2	17,169.2	-
14	130	405,754	105,899.0	105,825.8	-
14	150	5,449,329	1,530,733.3	2,288,720.3	-
14	160	10,543,905	1,932,754.4	5,844,831.4	-
14	168	2,523,925	198,508.3	596,686.2	-
14	169	1,319,359	40,050.7	370,224.2	-
14	170	1,458,530	480,869.3	563,792.0	-
14	175	9,162,958	2,461,348.1	3,932,672.4	-
14	178	537,072	88,954.9	176,680.2	-
14	179	178,945	17,410.0	63,703.2	-
14	200	1,667,451	344,049.9	345,303.0	-
14	202	16,634	683.1	714.6	-
14	203	51	7.8	7.8	-
14	204	7,353	-	-	-
14	205	125	-	1.4	-
14	206	38	-	-	-
14	207	49	-	-	-

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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 (sic);

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.

Response:

See attached spreadsheet.

FY 2001

LDC	OPER	Work Hours	FHP (000)	TPH (000)	TPF (000)
11	046	187,598	705,925.2	226,136.9	1,249,057.0
11	047	79,408	(2,925.1)	594,703.9	777,743.9
11	241	50	94.6	-	-
11	242	83	-	-	-
11	243	179	-	-	-
11	244	13	-	-	-
11	245	1	-	-	-
11	246	59	48.6	-	-
11	249	8	6.4	-	-
11	250	26	-	-	-
11	251	166	-	-	-
11	261	204,855	763,436.6	964,626.7	1,249,332.1
11	262	1,362	(553.1)	57,700.7	67,381.5
11	263	8,903	34,530.5	73,886.5	86,898.6
11	264	9,872	56,487.5	98,091.1	109,460.3
11	265	2,180	642.7	17,791.6	19,155.4
11	266	1,951	441.8	75,145.9	82,179.1
11	267	23,156	22.9	9,485.5	10,720.9
11	271	2,274,057	9,226,411.8	18,922,963.9	22,172,668.1
11	272	67,565	126,354.1	721,367.7	855,721.6
11	273	73,736	121,727.5	485,564.3	610,696.9
11	274	23,083	5,764.6	229,336.3	262,302.4
11	275	30,836	2,826.2	140,762.5	176,225.7
11	276	2,027	8,656.6	19,164.3	20,510.8
11	277	26	-	0.6	0.6
11	278	122	1,211.8	12,308.6	13,173.1
11	279	45	-	663.0	669.8
11	281	284,479	1,605,079.4	1,887,023.0	2,836,255.7
11	282	835	227.9	13,771.1	19,321.2
11	283	26,960	88,541.5	100,890.4	153,467.8
11	284	22,376	76,386.3	96,631.4	125,642.9
11	285	4,001	20,756.4	19,838.1	32,714.4
11	286	1,502	16.5	-	-
11	287	12	16.9	-	-
11	291	7,558	38,648.1	59,516.0	78,987.1
11	292	946	-	361.3	572.0
11	293	154	34.9	1,098.2	1,506.4
11	294	406	3,601.5	2,088.6	2,283.2
11	295	14	51.2	250.8	520.5
11	296	318	363.0	1,221.1	1,310.8
11	297	2	48.9	0.4	0.4
11	298	50	-	-	-
11	299	16	-	-	-
11	301	14,921	38,232.5	7,714.3	66,161.8
11	302	269	1.9	-	-
11	303	57,488	268,407.7	88,336.5	317,727.2
11	304	40	-	-	-

11	309	9,968	57,180.0	45,008.7	50,888.0
11	311	1,519	59.5	11,637.0	14,466.6
11	312	18,919	119,407.5	53,360.2	59,044.5
11	313	16,752	305.9	131,392.9	151,201.6
11	314	31,974	117,357.7	104,132.9	115,302.7
11	315	4,168	15.4	20,438.9	26,831.0
11	316	139	-	498.5	538.0
11	317	80,273	1,035.5	247,952.2	335,964.9
11	318	5,529	24,549.2	22,120.2	44,867.3
11	319	4,514	16,521.9	7,495.7	20,952.5
11	356	10,833	80,752.3	21,637.2	61,098.9
11	357	13,116	112,660.4	26,904.3	91,648.4
11	603	5,915	-	-	-
11	604	38	-	-	-
11	831	153,374	533,919.2	356,972.9	504,236.1
11	832	19,577	11,504.8	186,011.4	241,714.6
11	833	101,953	186,222.2	224,290.2	277,333.2
11	834	382,342	598,374.3	1,544,907.5	1,822,536.6
11	835	235,217	245,997.9	802,694.1	973,305.6
11	836	226,498	25,425.1	1,654,590.6	1,811,985.0
11	837	27,518	6,504.7	67,111.2	72,297.6
11	839	-	17.9	-	-
11	841	217,027	496,433.8	836,049.0	1,253,054.5
11	842	42,228	37,181.5	218,737.5	266,470.8
11	843	185,386	298,812.3	535,270.8	740,521.3
11	844	283,764	492,344.5	1,111,980.3	1,454,395.2
11	845	93,719	169,500.0	384,319.6	498,620.7
11	846	96,519	52,492.9	504,830.3	569,298.2
11	847	282	483.7	1,263.6	1,432.4
11	851	2,110	126.9	0.3	23.2
11	852	17	(3.6)	-	-
11	853	85	-	-	-
11	854	1,451	539.0	13.3	13.3
11	855	16	149.2	-	-
11	856	44	840.1	30.9	30.9
11	857	828	-	5.0	6.7
11	861	3,010	17,241.3	6,510.4	28,187.3
11	862	3,195	6,030.4	25,149.5	35,221.9
11	863	22,896	84,372.6	68,501.4	111,404.7
11	864	39,380	121,264.0	343,579.5	384,245.4
11	865	29,883	67,262.6	218,991.5	245,448.8
11	866	60,566	9,179.7	721,260.1	764,338.6
11	867	5,193	12,172.8	68,488.7	79,387.5
11	868	226	28.8	2,085.8	2,184.1
11	869	552	-	1,565.2	1,571.0
11	871	230,170	817,201.0	558,888.2	589,725.0
11	872	115,292	171,243.0	1,018,606.4	1,052,749.9
11	873	841,907	5,087,731.8	5,305,368.1	5,556,029.0
11	874	2,030,714	10,965,087.4	11,352,121.9	11,865,789.2
11	875	802,804	4,458,508.4	4,899,459.1	5,214,004.0
11	876	1,437,408	2,339,446.1	6,328,016.5	6,598,632.6
11	877	73,436	65,220.0	869,906.8	893,648.9
11	878	167,594	464,084.5	825,826.2	848,987.5

11	879	47,867	287.8	616,562.4	625,736.6
11	881	3,942,595	22,278,758.4	17,413,072.9	23,415,879.1
11	882	12,016	70,083.1	57,543.7	80,148.5
11	883	1,322,156	2,428,378.8	2,446,478.7	3,589,757.0
11	884	627,049	1,572,622.1	2,294,453.3	2,806,184.2
11	885	390,193	713,064.9	1,003,483.1	1,290,481.9
11	886	6,888	4,816.0	24,763.6	27,042.4
11	887	91,633	572.2	1,674.0	2,185.8
11	891	2,193,858	13,047,465.0	13,992,356.1	14,659,376.5
11	892	1,234,325	2,741,088.2	10,007,430.4	10,332,527.5
11	893	4,799,024	23,702,242.5	25,900,696.4	26,883,388.1
11	894	3,708,301	20,296,276.7	21,205,985.3	21,928,116.1
11	895	1,763,359	10,988,303.9	10,963,413.9	11,337,028.5
11	896	2,591,952	7,076,523.5	17,224,456.7	17,966,832.7
11	897	318,443	660,221.2	3,689,413.2	3,763,185.1
11	898	481,908	928,359.2	2,212,475.2	2,252,744.6
11	899	105,211	257.2	1,394,473.9	1,411,585.7
11	908	705	6.0	13,271.6	15,283.0
11	909	1,459	5.1	1,334.6	1,476.6
11	910	1,177	214.8	29,930.1	30,446.9
11	911	11,098	18,546.3	245,801.2	249,292.5
11	914	19,873	44,077.2	284,974.0	292,513.6
11	915	5,335	30.6	219,585.8	226,073.1
11	916	7,418	9,553.7	60,822.3	62,072.2
11	917	2,837	788.4	50,274.0	51,319.9
11	918	11,116,162	23,655,862.4	71,676,810.0	73,305,911.5
11	919	3,621,759	3,253.7	62,004,299.9	63,043,507.0
11	925	8,286	2,163.1	6,685.4	6,809.7
11	926	497	34.3	5,864.4	5,959.8
11	971	715,214	2,426,590.2	4,040,758.2	4,834,250.0
11	972	103,789	168,756.3	442,193.8	534,355.9
11	973	218,614	323,401.7	989,291.4	1,213,188.1
11	974	120,592	334,225.4	671,799.8	798,175.3
11	975	73,549	193,578.3	382,208.0	440,228.7
11	976	21,040	114,929.7	316,307.8	329,831.1
11	977	69	3,020.4	14,193.7	14,566.0
11	978	8,125	2,046.8	18,811.5	23,048.0
11	979	8,212	0.3	21,514.0	27,350.6
12	083	-	5.3	-	-
12	084	-	34.1	45.5	45.5
12	085	19	-	-	-
12	086	-	-	-	-
12	087	-	-	1.6	1.6
12	088	-	-	-	-
12	089	-	-	-	-
12	092	-	-	-	-
12	094	-	39.4	90.5	90.5
12	095	-	8.9	160.7	160.7
12	096	-	-	-	-
12	099	-	0.7	-	-
12	141	2,090,447	790,815.3	914,826.3	920,332.9
12	142	239,729	29,102.2	165,846.3	168,845.2
12	143	1,092,400	415,480.1	443,468.0	447,490.8

12	144	1,307,746	386,192.7	672,850.6	679,521.9
12	145	575,323	128,415.8	240,795.2	242,438.4
12	146	1,005,007	148,724.6	408,189.7	412,274.1
12	147	53,844	1,720.9	28,699.3	29,046.8
12	148	16,098	339.5	10,817.7	11,601.1
12	190	10	0.5	-	-
12	192	60,247	11,828.2	17,084.5	17,257.1
12	193	18,622	3,057.8	7,178.1	7,344.2
12	196	-	-	-	-
12	305	125,039	56,761.8	59,952.1	60,987.4
12	306	102,347	53,837.7	59,051.8	60,189.3
12	307	19	-	-	-
12	308	121	-	-	-
12	331	1,322,100	2,061,307.3	2,198,804.1	2,417,978.4
12	332	72,086	34,954.2	177,676.8	195,454.5
12	333	1,611,437	2,173,824.1	2,431,619.1	2,658,839.2
12	334	1,158,803	1,815,531.6	1,873,899.4	2,027,935.7
12	335	520,349	814,300.5	736,669.4	804,092.7
12	336	2,378,843	2,887,510.9	3,951,324.4	4,426,119.0
12	337	8,210	5,072.2	11,173.9	13,263.8
12	338	476	54.2	244.9	293.3
12	421	943,998	691,763.6	488,109.7	603,715.0
12	422	119,956	32,161.0	84,818.0	100,635.8
12	423	1,224,495	736,843.8	563,761.9	678,913.7
12	424	2,106,767	1,660,262.4	1,213,611.6	1,380,617.0
12	425	332,529	318,344.8	176,228.7	205,142.5
12	426	5,983,121	3,221,378.3	3,237,814.0	3,642,918.3
12	427	10,340	6,022.4	8,285.6	10,682.1
12	441	2,731,050	834,384.0	1,421,645.9	1,453,708.4
12	442	394,856	45,872.0	290,764.2	299,209.5
12	443	2,839,026	835,215.6	1,206,891.4	1,241,088.3
12	444	3,321,776	1,187,326.6	1,739,459.0	1,785,539.0
12	445	984,384	253,715.4	448,928.3	459,663.4
12	446	500,722	174,567.5	308,261.8	315,907.3
12	447	43,297	8,771.4	27,921.3	29,222.6
12	448	49,407	8,649.7	9,824.8	12,169.6
12	450	39,590	54,062.1	18,271.4	18,629.0
12	451	26,608	8,940.7	12,602.7	12,713.5
12	461	48,821	16,962.3	3,241.3	3,842.4
12	462	2,656	37.1	99.1	128.5
12	463	21,345	31,374.1	21,096.6	25,115.9
12	464	94,398	116,172.0	68,975.1	82,712.5
12	465	20,961	24,622.9	8,424.5	10,080.4
12	466	219,995	113,592.9	189,389.6	227,359.5
12	467	1,347	(1.9)	200.5	248.0
12	468	226	0.3	18.6	27.2
12	911	16	-	-	-
12	961	778	293.1	32.8	38.3
12	962	42	-	6.4	6.4
12	963	3,284	13,741.5	3,556.5	3,899.0
12	964	4,094	16,245.5	109.3	118.2
12	965	2,147	5,877.9	1,039.0	1,049.8
12	966	72,883	36,984.8	24,971.1	27,765.3

12	967	45	174.1	11.3	12.9
13	052	44	296.3	166.4	8.9
13	053	112	-	-	-
13	054	213	-	-	-
13	056	-	286.6	0.8	0.8
13	059	32	1.9	-	-
13	081	29,807	35,298.5	31,770.4	35,195.0
13	090	3,703	718.4	3,706.9	3,868.8
13	091	697	57.9	4,847.0	4,855.1
13	104	7,462	173.7	855.2	868.0
13	105	371,239	31,608.2	30,005.3	30,675.6
13	106	118	-	-	-
13	107	22,098	401.7	472.4	493.1
13	108	3,196	-	-	-
13	134	2,447,396			
13	135	832,637			
13	136	3,650,947			
13	137	5,402,772			
13	138	1,566,767	303,594.2	390,899.7	392,388.4
13	139	1,805,249	424,274.0	485,575.7	490,276.4
13	191	60	1.2	-	-
13	238	1,150,295			
13	239	787,568			
13	254	107,498			
13	255	72,537			
13	256	285,873			
13	257	501,251			
13	258	552,009	82,135.2	83,058.5	83,109.1
13	259	553,868	81,485.9	92,014.3	91,977.9
13	279	8	-	-	-
13	332	-	-	-	-
13	334	-	-	-	-
13	336	6	-	-	-
13	340	3	-	-	-
13	346	223,366			
13	347	179,550			
13	349	303			
13	434	84,094			
13	435	6	-	-	-
13	436	230	-		
13	437	7,480	-		
13	438	14,059	-	6,612.5	6,527.3
13	439	687	-	109.6	116.6
13	592	12	-	-	-
13	618	75	-	-	-
13	619	274	-	-	-
13	627	277	-	-	-
13	628	328	-	-	-
13	629	1,476	-	-	-
13	649	8	-	-	-
13	662	162	-	-	-
13	666	-	-	-	-
13	742	37	-	-	-

14	029	163,769	181,288.1	226,083.1	-
14	030	12,383,609	4,020,821.2	5,752,899.5	-
14	032	303,283	82,671.2	114,278.7	-
14	033	149,531	33,437.8	54,245.5	-
14	040	2,550,036	206,556.0	1,309,281.7	-
14	043	3,652,164	1,271,077.6	1,895,834.8	-
14	044	5,803,616	2,337,864.1	3,863,887.3	-
14	045	998,246	613,709.3	661,234.0	-
14	050	6,744,900	1,351,604.4	1,390,016.6	-
14	051	346	-	-	-
14	052	12	-	(0.7)	-
14	053	126	-	-	-
14	054	5	-	-	-
14	055	4,378,473	1,201,897.5	1,231,585.7	-
14	056	1,034	-	-	-
14	060	782,924	318,192.7	359,498.9	-
14	062	26,664	6,136.9	7,474.4	-
14	063	4,776	249.5	249.5	-
14	069	43,216	30,518.4	30,519.7	-
14	070	213,407	34,320.1	91,966.8	-
14	073	302,240	98,472.1	109,080.9	-
14	074	1,871,220	925,970.1	1,025,319.3	-
14	075	233,572	75,224.9	79,954.2	-
14	100	587,399	228,393.7	229,110.2	-
14	102	341,941	11,666.2	11,817.9	-
14	103	96,646	14,693.9	14,693.9	-
14	130	485,686	113,220.9	113,218.5	-
14	150	4,739,055	1,238,390.1	2,027,703.3	-
14	160	8,292,105	1,612,819.3	4,878,490.2	-
14	168	2,249,030	222,812.3	650,421.8	-
14	169	1,189,538	90,825.4	489,944.0	-
14	170	1,179,214	364,057.1	445,683.6	-
14	175	7,217,850	1,826,532.2	3,097,869.7	-
14	178	540,144	115,597.5	216,980.9	-
14	179	163,415	21,769.6	78,483.2	-
14	200	1,536,076	375,189.5	379,894.5	-
14	202	13,376	305.3	305.3	-
14	203	187	-	-	-
14	204	22,473	-	-	-
14	205	18	-	9.2	-
14	206	12	-	-	-
14	207	259	-	-	-
14	320	-	-	-	-
14	321	140	-	-	-
14	324	364	-	-	-
14	325	9	-	-	-
14	326	6	-	-	-

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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, LDC 43 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.

Response:

The following is an estimate of FY2001 Function 4 volume data from the FLASH report which includes automated, mechanized, manual, and P.O. Box distribution. The volume is from End of Run (EOR) reports when available (e.g., when run on BCSs) and, in the absence of EOR data, the piece count is obtained via a conversion from containers or linear measurements. Therefore, these are estimates and not exact volume counts. Comparable data for FY2000 are not available.

Letters (000)	Flats (000)	Parcels (000)
80,594,131	24,900,441	2,800,000

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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, LDC 43 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.

Response:

Workhours in LDCs 41-44 are not available by shape. The workhours by LDC are from NWRS (National Worhour Reporting System).

FY	LDC	Workhours
2000	41	6,680,490
	42	310,682
	43	82,004,259
	44	18,061,042
2001	41	6,898,565
	42	284,452
	43	77,522,309
	44	17,563,714

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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.

Response:
The Management Operating Data System (MODS) numbers to be used for the AFSM 100, Video Coding System operations and associated Mail Preparation operations are as follows:

AFSM 100 PROCESSING	**MODS #**
Composite	330C
Outgoing Primary	331
Outgoing Secondary	332
Managed Mail Program	333
Sectional Center Facility	334
Incoming City Primary	335
Incoming Secondary	336
Box Mail	337
Incoming Non-Scheme	338
Reserved	339

Video Coding System	**MODS #**
Keying – Composite	380C
Keying – Career Employee	381
Keying – Transitional Employee	382

From Day 1 of Fiscal Year 2001 until Day 1 of Fiscal Year 2002 the following applied to Mail Preparation for AFSM 100

	MODS #	**LDC**
Mail Preparation	035	17

The Mail preparation operation for AFSM 100 includes the following activities and is limited to workhours associated with mail prep for the AFSM 100.

- Removal of strapping/banding on flat bundles destined for the AFSM 100
- Removal of polywrap on flat bundles destined for the AFSM 100
- Loading of Flat Mail Carts (FMC) and other types of rolling stock destined for the AFSM 100

- Securing the mail on the FMC destined for the AFSM 100 area

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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?

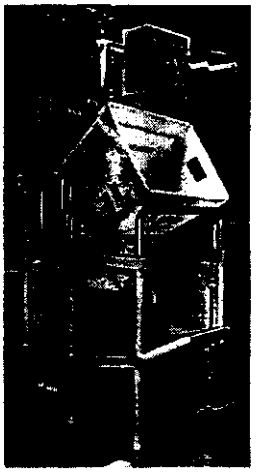
d. Under what circumstances is the "prepping" of flats performed by, respectively, clerks and mailhandlers?

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?

Response:

(a) For the most part, yes. Postal personnel working in mail preparation operations responsible for preparing mail for the AFSM 100 should load mail into the Flat Mail Carts (FMCs) whenever possible and practical to minimize the number of handlings required to process mail. However, mail that is received in flat mail trays can be taken to the AFSM 100 feeders to supplement the feeding of mail from the FMCs. The flat mail in the trays does not have to be removed from the flat trays and placed into the FMCs prior to feeding. As long as the operator can reasonably determine the bound edge of the mail without allowing the AFSM 100 feeder to run out of mail, then the operators should load directly from the flat trays in addition to loading from the FMC. The flat tray rack designed for holding trays of flat mail at the feed



station is intended to make it easier for operators to extract mail from the trays for loading on the AFSM 100. Therefore, some prepping may be involved by the AFSM 100 feeders.

(b) and (c) See response to AOL-TW/USPS-5.

(d) Refer to attached letter, subject of AFSM 100 Mail Preparation dated December 28, 2000.

(e) See response to (a).

(f) Processing operations managers rely on the assistance of In-Plant Support personnel to determine when and what types of mail should be processed on all FSMs for planning purposes. Processing schedules by machine type are developed by In-Plant Support in advance of receiving an AFSM 100 to determine exactly when each piece of equipment will be run and what type of mail will be run on each for an average day. This plan includes a priority ranking of mail types by machine type so that if a given machine type is not available, supervisors will have a backup plan to implement.

The AFSM 100 was purchased to process at a minimum the mail that was compatible with the FSM 881 (DMM C820.2). Mail processing supervisors maximize the use of AFSM 100s and is the processing mode of choice assuming the mail meets the machinability characteristics for the AFSM 100.

Clerks and mailhandlers receive training to make the determination of what is AFSM 100 –compatible or is to be sent to the FSM 1000. They are instructed to send it to the AFSM 100 when in doubt. The AFSM 100 feeders, who have the most experience with what is likely to run and have access to a template for

length, width and thickness at each feeder, are the last point in the decision making process.

Attachment to
AOL/USPS-6

UNITED STATES POSTAL SERVICE

December 28, 2000

MANAGERS, LABOR RELATIONS (AREA)

SUBJECT: AFSM 100 Mail Preparation

A number of questions have arisen regarding the application of my August 21 memorandum on AFSM 100 mail preparation.

In some cases, the unions have tried to use the memorandum as a contractual staffing requirement. The memorandum did not establish any contractual staffing requirement for the AFSM 100. The Postal Service maintains the exclusive right under Article 3 to determine the methods, means, and personnel by which our operations are to be conducted. Once the staffing for an operation has been determined, the craft assignments must be consistent with the principles of RI-399 and subsequent agreements.

The memorandum was intended to alert field management that any staffing decision which results in the assignment of AFSM 100 mail preparation work to other than the primary craft must be based on the principles of RI-399. This includes any determination that such assignment legitimately made the operation more efficient and effective than if the work had been assigned to the primary craft. Because of the likelihood of jurisdictional challenges in such situations and the need to defend the craft assignments based on contractual principles, District or Area Labor Relations must be directly involved in the assignment of this work to the most appropriate craft.

Another question which has arisen is whether AFSM 100 preparation operations must be assigned to the mail handler craft, even if the previous FSM preparation operations were properly staffed by clerks according to the facility inventory. A determination must be made at the local level, based on the specific facts present in that facility and based on the specific language in the inventory, as to whether the preparation of mail for the AFSM 100 is sufficiently different from the prior operation to consider it a new operation. If it is determined that the AFSM 100 preparation operation is simply a continuation of the previous flats preparation operation, the craft jurisdiction would not change. However, if the determination is that a new or separate AFSM 100 preparation operation has been established which was not previously covered by the facility inventory, the work should be assigned to the primary craft and the operation added to the existing inventory.

If there are any questions, please contact Dan Magazu at (202) 268-3825.

Peter A. Sgro
Manager
Contract Administration

475 L'Enfant Plaza SW
Washington DC 20260-4100

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

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?

Response:

(a) See response to AOL-TW/USPS-5.

(b) VCS employees (Data Conversion Operators) are considered part of the AFSM 100 system but are not generally referred to as "part of the AFSM 100 crew". The "AFSM 100 crew" generally refers to the feeder and sweeper operators. This is however considered a generic term and could include the VCS employees in some instances.

(c) and (d) The number of DCOs varies with mail characteristics and times of the day. For example, during tour 2, primarily incoming Standard Mail is processed on the AFSMs, while on tour 3 the focus is on outgoing First-Class Mail. As referenced in part f of this question, a smaller portion of Standard Mail flats

requires keying than First Class flats. A staffing model was developed to aid in the determination of proper staffing in the VCS room. The model uses number of machines, machine throughput, BCR/OCR accept rate (mail type), and a DCO keying rate to determine the average hourly staffing for the VCS function. The model is an easy to use Excel-based spreadsheet.

(e) The Data Conversion Operator (DCO) is a PS-4.

(f) Yes, volume information is captured for the VCS operation. Approximately, 13% of the total flats processed on the AFSM 100 are lifted as images and sent to the VCS room for processing with 90-95 percent of the images successfully coded. 3-7 percent of Standard/Periodical flats require VCS coding and 17-25 percent of First Class flats require VCS coding.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME WARNER, INC.

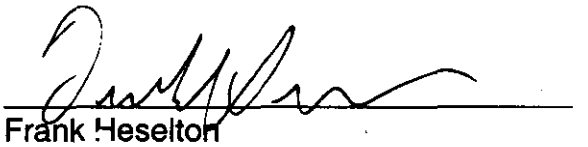
AOL-TW/USPS-8 Has the Postal Service collected any statistics on the frequency of jams at AFSM-100 feeder stations, the impact of such jams on machine productivity, or the mail characteristics and other factors that are likely to cause jams? If yes, please provide the findings from all such analyses.

Response:

The AFSM 100 averages about 3.5 jams per 1000 pieces fed. Productivity targets are not adversely impacted unless jam ratio exceeds 4 jams per 1000 pieces. Factors likely to cause jams include cheaply made polywrap, poor feeding techniques, single-stapled binders, polywraps with excessive selvage, and polywraps that stick together.

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.



Frank Heselton

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
October 16, 2001