

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

RECEIVED

OCT 19 3 00 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

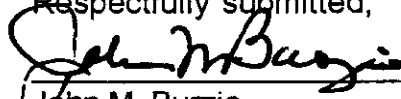
POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

INTERROGATORIES OF AOL TIME WARNER INC.
TO THE UNITED STATES POSTAL SERVICE (AOL-TW/USPS-18-21)
(October 19, 2001)

Pursuant to the Commission's Rules of Practice, AOL Time Warner Inc.
(AOL Time Warner) hereby submits the following interrogatories to the United
States Postal Service.

Respectfully submitted,



John M. Burzio

Timothy L Keegan

Counsel for
AOL Time Warner Inc.

Burzio & McLaughlin
Canal Square
1054 31st Street, N.W.
Suite 540
Washington, D.C. 20007
(202) 965-4555

THIRD SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE

AOL-TW/USPS-18 Please refer to the spreadsheet "Resp-AOL-TW-USPS-1-8.XLS", filed with your response to AOL-TW/USPS-1-8. Column D on worksheet "2000 – MODS" contains FY2000 work hours per 3-digit MODS code. Please explain why the numbers are not identical to the corresponding BY00 workhours listed in Table I-2B of USPS LR-J-55.

AOL-TW/USPS-19 Please refer to your answers to AOL-TW/USPS-1, 2, 5 and 7.

- a. Please confirm that MODS codes 381 and 382 are included under LDC 15.
- b. Please provide FY2000 and FY2001 MODS workhours and, to the extent available, volumes for LDC 15, similar to the data provided in response to AOL-TW/USPS-1&2 for LDC 11-14.
- c. Do TPH volume data for the AFSM-100 MODS codes (33x) include pieces finalized through the VCS system? If yes, what causes the fairly substantial (roughly 10% in the FY2001 data) differences between TPF and TPH numbers for the AFSM-100 codes?

AOL-TW/USPS-20 Your response to AOL-TW/USPS-5 appears to indicate that the practice of recording AFSM-100 mail preparation hours separately under MODS code 035 was for FY2001 only and has been discontinued.

- a. Please state whether this is the case, and if it is, indicate how AFSM-100 "prepping" hours will be recorded in the future.
- b. Please provide MODS 2001 workhours for all LDC 17 MODS codes, corresponding to the BY00 workhours in Table I-2B of LR-J-55. Please include also the workhours recorded for 035 in FY2001.
- c. Was any volume data also recorded for MODS code 035 in FY2001? If yes, please provide it. Please also provide any other data that the Postal Service may have regarding the productivity (pieces per hour) of the type of work that would have been recorded under MODS code 035.
- d. If flats from bundles sorted at an SPBS were then "prepped" for the AFSM-100, at the SPBS operation, would that work have been recorded as MODS 035 or under one of the SPBS related MODS codes in FY2001?

AOL-TW/USPS-21 Please refer to your response to AOL-TW/USPS-6.

- a. Can one infer that, in the AFSM-100 environment, the FSM-1000, FSM-881 and

manual flats sorting operations often receive mail "prepped" in the same way that mail intended for the AFSM-100 is "prepped"?

b. Can one infer that some of the mail preparation work that in the AFSM-100 environment is performed before the flats reach a piece sorting operation would in the past have been performed by employees at the FSM-1000, FSM-881 or manual flat sorting operations?

c. Is it reasonable to conclude that in the AFSM-100 environment, the FSM-1000, FSM-881 and manual flat sorting operations should, other factors being equal, be able to achieve higher productivity rates than in the past, since the "prepping" work, or part of it, that clerks at these operations had to do previously now will already have been performed when they receive the flats that need to be sorted. Please explain fully.

d. Are flats that will receive incoming secondary sorting at Associate or Function 4 offices sometimes prepared on FMC's before being dispatched from the processing plant? If yes, how often?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document on all participants of record in this proceeding in accordance with the Commission's Rules of Practice.



Timothy L. Keegan

October 19, 2001