

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

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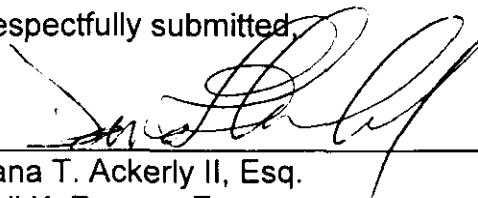
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS KINGSLEY**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Kingsley: DMA/USPS-T39, Nos. 25-35. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

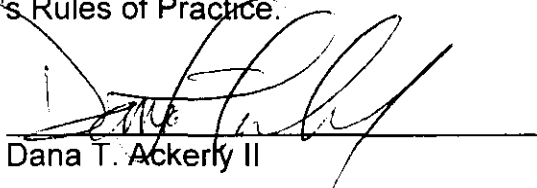


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in
accordance with Section 12 of the Commission's Rules of Practice.


Dana T. Ackerly II

Dated: November 7, 2001

**INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY**

DMA/USPS-T39-25. Please describe in detail the supervision of letters processing. In your description, please list all activities that the supervisors perform and provide a rough breakdown of the time typically spent in each of them. Please also include in your description an explanation of how the span-of-control is determined.

DMA/USPS-T39-26. Please describe in detail the supervision of parcels processing. In your description, please list all activities that the supervisors perform and provide a rough breakdown of the time typically spent in each of them. Please also include in your description an explanation of how the span-of-control is determined.

DMA/USPS-T39-27. In a P&DC, within a single tour does a clerk typically work only on letter shaped mail or only on parcels or only on flat shaped mail, or does the same clerk work on more than one shape of mail?

DMA/USPS-T39-28. In a P&DC, during an AP does a clerk typically work only on letter shaped mail or only on parcels or only on flat shaped mail, or does the same clerk work on more than one shape of mail?

DMA/USPS-T39-29. In a P&DC, during a single tour does a supervisor typically supervise craft labor only on letter shaped mail or only on parcels or only on flat shaped mail, or does the same supervisor typically supervise craft labor working on more than one shape of mail?

DMA/USPS-T39-30. In a P&DC, during an AP does a supervisor typically supervise craft labor only on letter shaped mail or only on parcels or only on flat shaped mail, or does the same supervisor typically supervise craft labor working on more than one shape of mail?

DMA/USPS-T39-31. Please describe in detail the training that a new supervisor receives. Include in your description the number of hours of classroom and on-the-job training the supervisor receives. Please also provide as a library references all course materials used in the classroom training and any manuals, publications, etc. the new supervisor receives.

DMA/USPS-T39-32. Please describe in detail any refresher training that a supervisor receives. Include in your description the number of hours of classroom training and the number of on-the-job training hours the supervisor receives. Please also provide as a library reference all course materials used in the classroom training and any manuals, publications, etc. that the supervisor receives.

DMA/USPS-T39-33. For any material provided in response to the last two questions, please provide the dates of the last five revisions to each.

DMA/USPS-T39-34. In discussing supervision in your testimony you say, "even a partially staffed operation must be supervised."

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- (a) Does this imply that as clerk and mailhandler hours increase in response to volume increases, supervisory hours will not increase in proportion to the clerk and mailhandler hours?
- (b) Does this imply that as clerk and mailhandler hours decrease in response to volume decreases, supervisory hours will not decrease in proportion to the clerk and mailhandler hours?
- (c) Do you believe, in general, that costs can be fully variable with respect to volume changes as volume increases, but less than fully variable with respect to volume changes as volume decreases? If your answer is anything other than an unqualified no, please explain all operational reasons underlying your beliefs.

DMA/USPS-T39-35. In your testimony you say, "As operations are automated, the number of people in the operation declines while the difficulty of managing the mail flow and the equipment increases, preserving a rough balance in the supervisory workload."

- (a) Please provide all studies, reports, and quantitative information you have supporting this statement.
- (b) Assume that the productivity of manual incoming secondary sorting is 400 pieces per hour so a complement of 75 clerks would be required to sort 30,000 letters in an hour. Further assume that three clerks could sort the same 30,000 letters in an hour on a bar code sorter. Does your statement mean that the 75 manual clerks would require the same number of supervisory hours as the three clerks staffing the bar code sorter?
- (c) Please provide a chronology for the automation of letters. Please include the year bar code sorters were first introduced, how quickly they penetrated the workplace, and the split between the number of manual and automated sorts over time.
- (d) Please provide a chronology for the automation of flats. Please include the year flat sorters were first introduced, how quickly they penetrated the workplace, and the split between the number of manual and automated sorts over time.
- (e) Has the ratio of costs of those supervising clerks and mailhandlers to clerks and mailhandlers increased dramatically as the Postal Service has automated?