

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

POSTAL RATE & FEE CHANGES, 1997

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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS MODEN (TW/USPS-T4-11-16)
(August 4, 1997)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Moden (USPS-T-4). If witness Moden is unable to respond to any interrogatory, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,



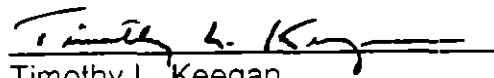
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the following document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Timothy L. Keegan

August 4, 1997

SECOND SET OF INTERROGATORIES TO WITNESS MODEN (USPS-T-4)

TW/USPS-T4-11 Please list and describe as completely as possible the various activities engaged in by clerks working at a manual flats case, including the actual sorting of flats into the case as well as the various "allied labor" functions performed. Please include all activities that a clerk would perform while clocked into a MODS number corresponding to manual flat sorting (e.g. 060, 073, 170, etc.). If any written documentation describing these activities exists, please provide it. In addition, please answer the following.

a. Please identify and describe separately the activities where a clerk at a manual flats case is:

- (1) handling individual flats;
- (2) handling bundles of flats to be sorted;
- (3) handling bundles already sorted;
- (4) handling trays of flats to be sorted;
- (5) handling trays of already sorted flats;
- (6) handling sacks of flats to be sorted;
- (7) handling sacks of already sorted flats;
- (8) handling rolling containers of flats to be sorted;
- (9) handling rolling containers of flats already sorted;
- (10) handling empty equipment; and
- (11) not handling mail or empty equipment.

b. Are there industrial engineering standards that describe the productivity to be expected in the individual activities that employees at a flats case engage in? If yes, please provide those standards along with any explanation needed for a layman to understand them.

c. Please assume that at a given manual flats case there is enough mail available to assure that the employees will be kept fully occupied. Based on your observation, experience and knowledge, what percentage of their total time would you expect clerks at this operation to spend on each required activity? In particular, what percentage of employee time would you expect to be spent on:

- (1) sorting flats into flats cases;
- (2) sweeping or other handling of already sorted bundles, trays or sacks;
- (3) handling bundles, trays or sacks of flats to be sorted;

- (4) other handling where employees touch the mail or bundles, trays, sacks or other containers with mail;
- (5) handling empty equipment; and
- (6) other activities where mail is not handled?

d. Based on your observation, experience and knowledge, please describe the extent to which productivity in manual flat sorting and the associated allied labor functions is affected by flats characteristics such as:

- (1) weight;
- (2) dimensions;
- (3) machinability; and
- (4) other characteristics (please describe).

e. Based on your observation, experience and knowledge, please describe the extent to which productivity in manual flat sorting and the various allied labor functions at a manual flats case are affected by local conditions and describe the types of local conditions that might affect flat case productivity.

f. Please describe technological or methodological changes that have affected productivity at manual flats cases over the last ten years. Please also describe any further changes expected to impact flats case productivity in the test year of the current rate case.

g. Please describe any effects that you expect the IMHS to have on the activities performed by clerks at manual flats cases and on flats case productivity.

TW/USPS-T4-12 Please answer the following questions regarding current and future use of flat sorting machines.

a. Can an FSM 881 without OCR be used simultaneously both in the BCR and manual keying mode? If yes, explain how this is done, if no, explain why not and what is involved in switching from one mode to another.

b. On OCR equipped FSM 881's, will barcoded and non-barcoded flats sometimes be fed at the same time? If yes, please discuss any problems that might result from mixing barcoded and non-barcoded flats in the output stream.

c. Will OCR equipped FSM's sometimes be used with OCR reading of some flats while others are keyed manually, at the same time?

d. When an FSM 881 has been equipped with an OCR, will that FSM still be used in a manual keying mode? If yes, describe the conditions under which this

is expected to occur.

e. If a mixture of barcoded and non-barcoded flats are fed to an FSM-OCR, will it automatically use the OCR on the non-barcoded flats and the BCR on the barcoded flats, or will the operator need to select one mode or the other? Please explain.

TW/USPS-T4-13 In LR-H-134, Section 2, page 12, the acceptance rate for non-barcoded flats on an FSM-OCR is given as 60%, except that there is also reference to a "Second Pass acceptance rate" of 70%.

a. When non-barcoded flats are rejected from an FSM/OCR, please describe the subsequent processing steps. Will the rejected flats be: (1) fed for a second pass on the same machine; (2) manually keyed on the same FSM; (3) manually keyed on an FSM-1000 (when available); (4) sorted manually; or (5) any other (please describe)?

b. Does the 70% "Second Pass acceptance rate" mean that of non-barcoded flats successfully sorted on an FSM in the OCR mode in the first pass, only 70% will be accepted in a later FSM-OCR sort? If no, please describe what it means.

c. Please describe the characteristics of machinable non-barcoded flats that are believed to affect acceptance rates on FSM-OCR's.

d. Does the Postal Service today have any recorded experience with FSM-OCR sorting of live mail? If yes, please provide all written reports pertaining to the results of this experience and indicate the measured acceptance rates and productivity rates.

e. How many FSM's will be sorting live mail with OCR's: (1) at the start of FY98; and (2) at the end of FY98?

f. Has the Postal Service conducted any analysis to see whether FSM-OCR sorting, despite the low acceptance rate, will save costs relative to continued use of manual keying for non-barcoded, machinable flats? If yes, please describe the results of any such study and provide a copy.

TW/USPS-T4-14 Please list and describe as completely as possible the various activities engaged in by clerks working at a flat sorting machine. Please include all activities performed while a clerk is clocked into a MODS number corresponding to mechanized or automated flat sorting. Please provide separate answers (unless identical) for: (1) an FSM-1000; (2) an FSM 881 used in manual keying mode; (3) and FSM 881 used in the OCR mode; and(4) an FSM used in the BCR mode. If any written documentation describing these activities exists, please provide it. In addition, please answer the following, for each type of flat

sorting machine:

a. Please identify separately the activities where a clerk at an FSM is:

- (1) handling individual flats;
- (2) handling bundles of flats to be sorted;
- (3) handling bundles already sorted;
- (4) handling trays of flats to be sorted;
- (5) handling trays of already sorted flats;
- (6) handling sacks of flats to be sorted;
- (7) handling sacks of already sorted flats
- (8) handling rolling containers of flats to be sorted;
- (9) handling rolling containers of flats already sorted;
- (10) handling empty equipment; and
- (11) not handling mail or empty equipment.

b. Are there industrial engineering standards that describe the productivity to be expected in the individual activities that employees at an FSM engage in? If yes, please provide those standards along with any explanation needed for a layman to understand them.

c. Please assume that at a given FSM there is enough mail available to assure that the employees will be kept fully occupied. Based on your observation, experience and knowledge, what percentage of their total time would you expect clerks at this operation to spend on each required activity? In particular, what percentage of employee time would you expect to be spent on:

- (1) keying or feeding flats;
- (2) sweeping or other handling of already sorted bundles, trays or sacks;
- (3) handling bundles, trays or sacks of flats to be sorted;
- (4) other handling where employees touch the mail or bundles, trays, sacks or other containers with mail;
- (5) handling empty equipment; and
- (6) not handling mail or empty equipment?

d. Based on your observation, experience and knowledge, please describe the characteristics of flats handled at the various types of FSM's that most affect productivity, and the extent to which productivity is affected by each such factor.

e. Based on your observation, experience and knowledge, please describe

the extent to which productivity in FSM sorting and the associated allied labor functions are affected by local conditions and describe the types of local conditions that most affect productivity.

f. Please describe technological or methodological changes that have affected productivity on FSM's over the last ten years. Please also describe any further changes expected to impact flats case productivity in the test year of the current rate case.

g. Please describe any effects that you expect the IMHS to have on the activities performed by clerks at FSM's and on FSM productivity.

h. Based on your observation, experience and knowledge, did the average productivity achieved in FSM sorting increase or decrease between FY88 and FY96? Please give separate answers for (1) FSM sorting with manual keying; and (2) overall FSM sorting. Please explain your answer.

i. Based on your observation, experience and knowledge, how much could one have expected the average productivity at FSM's to increase between FY88 and FY96, given the move to the 2+2 configuration, the introduction of flats barcoding and other technological improvements? Please explain your answer.

j. When the FSM's were being changed to the 2+2 configuration, how much did engineering studies indicate that this change would improve productivity?

TW/USPS-T4-15 Please describe the various types of opening unit functions applied in postal facilities to bundles, sacks, trays and pallets of Periodicals flats, and identify the ranges of MODS numbers used to identify these types of opening units. Additionally, please list and describe as completely as possible the various activities engaged in by postal employees working at opening units for Periodicals flats. Please include all activities that a clerk would perform why he is clocked into a MODS number corresponding to these opening units. If any written documentation describing these activities exists, please provide it. In addition, please answer the following, for each type of Periodicals flats opening unit:

a. Please identify separately the activities where a clerk at an opening unit is:

- (1) handling individual mail pieces;
- (2) handling individual bundles;
- (3) handling trays;
- (4) handling sacks to be opened;
- (5) handling pallets to be opened;

- (6) handling other containers to be opened;
- (7) handling sacks of mail that has been sorted at the opening unit;
- (8) handling other containers of mail that has been sorted;
- (9) handling empty equipment; and
- (10) not handling mail or empty equipment.

b. Are there industrial engineering standards that describe the productivity to be expected in the individual activities that opening unit employees engage in? If yes, please provide those standards along with any explanation needed for a layman to understand them.

c. Please assume that at a given opening unit there is enough mail available to assure that the employees will be kept fully occupied. Based on your observation, experience and knowledge, what percentage of their total time would you expect clerks at this operation to spend on each required activity? In particular, what percentage of employee time would you expect to be spent on:

- (1) sorting or otherwise handling individual bundles or mail pieces;
- (2) closing and removing sacks or other containers of already sorted mail;
- (3) opening, dumping or bringing to the opening unit sacks or other containers of mail to be sorted at the opening unit;
- (4) other activities that involve the handling of mail or containers with mail in them (please describe);
- (5) handling empty equipment; and
- (6) not handling mail or empty equipment?

d. Based on your observation, experience and knowledge, please describe the extent to which productivity in Periodicals opening units is affected by local conditions and describe the types of local conditions that most affect productivity.

e. Please describe technological or methodological changes that have affected productivity in Periodicals opening units over the last ten years. Please also describe any further changes expected to impact productivity in the test year of the current rate case.

f. Please describe any effects that you expect the IMHS to have on the activities performed at opening units and on productivity.

g. Based on your observation, experience and knowledge, did the average productivity achieved in Periodicals opening units increase or decrease between FY88 and FY96? Please explain your answer.

TW/USPS-T4-16 At pages 17-19 in your testimony you discuss the MODS and PIRS based cost pools used in this docket by witnesses Bradley and Degen. For each of these cost pools, what is a typical ratio of workers to supervisors? For example, at OCR's, which form one cost pool, how many workers does one supervisor typically supervise?

Please provide your best estimate of an average ratio for each cost pool. To the extent that the ratio of workers to supervisors in a given cost pool varies with *circumstances*, please explain what those circumstances are and how much one can expect the ratio to vary. If it is common for one supervisor to oversee the workers in more than one cost pool, please identify the groupings of cost pools that typically may be assigned to the same supervisor and estimate the ratio of workers to supervisors in the combined pools. If any written guidelines exist regarding the ratios of workers to supervisors at mail processing operations, please provide a copy.