

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

RECEIVED  
AUG 12 4 57 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MODEN TO INTERROGATORIES OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
REDIRECTED FROM WITNESS BRADLEY  
(DMA/USPS-T14-1, 7(A)-(C))

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS--T14-1, 7(a)-(c), filed on July 29, 1997, and redirected from witness Bradley.

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



Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999; Fax -5402  
August 12, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
TO INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.  
REDIRECTED FROM WITNESS BRADLEY

DMA/USPS-T14-1. Please describe the flexibility that a manager at a mail processing facility has in adjusting his labor force to the amount of mail which must be processed.

- a. If during a shift it is clear that there is extra labor, are there limits to the manager's ability to size the work force to the amount of work?
- b. If, over the course of an Accounting Period (AP), it is clear that there is extra labor, are there limits to the manager's ability to size the work force to the amount of work?
- c. If, over the course of a year, it is clear that there is extra labor, are there limits to the manager's ability to size the work force to the amount of work?
- d. To the extent that there is extra labor during a shift, how does a manager decide which operation to assign the labor to?

RESPONSE:

- a. Certainly there are limits, but a manager generally has adequate flexibility to size the workforce to the workload. Casual and Part Time Flexible employees will be clocked-out first. If this is inadequate, Full Time Regular employees will be surveyed to find who would like Annual Leave or Leave Without Pay. Alternatively, non-preferential volumes that were scheduled for later could be staffed immediately.
- b. Certainly there are limits. Our managers understand that mail volume varies day-by-day throughout the month, and they plan week-by-week their estimated casual and Part Time Flexible needs. This ability to reduce Casual and Part Time Flexible schedules generally provides sufficient flexibility to size the workforce to the workload.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
TO INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.  
REDIRECTED FROM WITNESS BRADLEY

- c. Certainly there are limits, but if attrition is insufficient there are contractual provisions for reassignment and termination which would provide sufficient flexibility.
- d. The manager will consider the employee's skills and look at other operations where those skills could be used. Alternately, non-preferential volumes could be rescheduled for immediate processing or the manager could get the excess labor off the clock as discussed in a. above.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
TO INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.  
REDIRECTED FROM WITNESS BRADLEY

DMA/USPS-T14-7 On page 21 of your testimony, you state that you use Total Equivalent Pieces (TEP) as the measure of workload at BMCs. Please derive the derivation of TEP.

- a. For which operations does TEP use actual counts and on which operation are counts derived from conversion factors?
- b. If any TEP are derived by conversion factors, please provide them.
- c. If any TEP are derived by conversion factors, when were the conversion factors developed.

RESPONSE:

The derivation of TEP is explained by witness Bradley.

- a. TEP uses counts for parcels. Conversion factors are used for all other operations.
- b. Conversion factors were provided in response to UPS/USPS-T4-1.
- c. The conversion factors were implemented in 1985-1986 based on a study completed earlier.

# DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Ralph J. Moden

Dated: 8/12/97

### 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.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
August 12, 1997