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

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97–1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORIES OF TIME WARNER, INC.
(TW/USPS–T4—11, 13–16)
AND ERRATUM TO MOTION FOR EXTENSION

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of Time Warner, Inc.: TW/USPS–T4—11, 13–16, filed on August 4, 1997. The Postal Service had moved on August 18 for an additional day to respond to these interrogatories, although the motion failed to mention interrogatory 11 and is hereby corrected.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 19, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF TIME WARNER

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.

Response:

Clerks at flats cases sort flats into individual separations or "pigeonholes". They may also obtain flats to be sorted, break bundles (i.e. remove straps, ties, etc.), sweep cases, (i.e., remove cased mail from individual separations) and handle equipment incidental to these tasks, all depending on local practice. See the attached Standard Position Description for a Distribution Clerk, PS-05. Descriptions of individual flat sorting operations are contained in Library

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Reference H-147.

a.

(1) Handling individual flats: a clerk at a manual flats case will hold a quantity of unsorted flats in one hand and sort individual flats with the other.

(2) Handling Bundles of flats to be sorted: depending upon local practice, a clerk at a manual flats case may retrieve flats to be sorted. Those flats may be in bundles which have to have strings/bands removed so that the individual pieces can be distributed.

(3) Handling bundles already sorted: depending upon local practice, a clerk at a manual flats case may remove flats they have sorted and "tie" them out for dispatch, i.e., band the grouping of flats in a particular separation to create a bundle. The bundle is then placed in a container.

(4) Handling trays of flats to be sorted: depending upon local practice, a clerk at a manual flats case may retrieve flats to be sorted which could be in flats trays, necessitating the movement of the tray from a central location within the operation to the individual case where the clerk will distribute those flats.

(5) Handling trays of already sorted flats: depending upon local practice, a clerk at a manual flats case may remove flats they have sorted and place them in trays for dispatch or movement to a subsequent operation.

(6) Handling sacks of flats to sorted: depending upon local practice, a clerk at a manual flats case may retrieve flats to be sorted which could be in sacks, necessitating the movement of the sack from a central location within the operation to the individual case where the clerk will distribute those flats.

(7) Handling sacks of already sorted flats: depending upon local practice, a clerk at a manual flats case may have to close out sacks to meet dispatches or when they are otherwise full.

(8) Handling rolling containers of flats to be sorted: depending upon local practice, a clerk at a manual flats case may push rolling containers of flats to be sorted within the manual flats operation for subsequent distribution.

(9) Handling rolling containers of flats already sorted: depending upon local practice, a clerk at a manual flats case may push rolling containers of flats already sorted.

(10) Handling empty equipment: depending upon local practice, a clerk at a manual flat case may move empty equipment (i.e., sacks, trays, rolling containers, etc.) incidental to the activities described above.

(11) Not handling mail or empty equipment: a clerk assigned to a manual flats case could be moving between the case and the area where flats to be sorted are retrieved, they could be returning to the case after having placed sorted flats into a container, they could be away from the area for personal needs, etc.

b. No

c. Clerks at flats cases sort flats into individual separations or pigeonholes. Other activities performed vary depending on local practice. Additionally, the characteristics of the mail being distributed can have an effect. For example, thick pieces fill flat separations faster than thin ones thereby necessitating more sweeping. I am therefore unable to provide estimates of the time spent on these activities.

d. Each listed factor can have an impact on productivity. For example, heavier/thicker pieces will fill flat separations more quickly thereby necessitating more sweeping. Oversize pieces may have to be folded before they can be placed in a separation. Pieces with slick coverings may be difficult to handle etc. I am unable to describe the extent of the impact any one of these factors may have on productivity.

e. The act of physically distributing flats at a manual case is common across facilities. Differences may include the number of separations being made, and, in some cases, the size of the separations. Layouts of the manual operations can vary by facility due to space constraints or local preference, which may in turn have some impact on productivity. For example, if the local practice is for clerks to retrieve mail to be sorted or to remove sorted mail and place it in a container, the distances involved can have an impact. See pages 21 and 22 of my direct testimony (USPS-T4) for additional information.

I am unable to describe the extent of the impact any of these factors may have on productivity.

f. I am not aware of any technological or methodological changes that have affected flat case productivities in the last ten years. I am unaware of any technological or methodological changes planned for the future. However, the continuing shift of machinable, easier to handle, flats to mechanized and automated handling should affect manual flats case productivity.

g. I do not expect IMHS to have any effect on the actual sorting of flats at manual cases. The effect , if any, of IMHS on the clerks activities incidental to sorting will depend on local practice.

STD POSITION DESCRIPTION U. S. Postal Service

DISTRIBUTION CLERK, PS-05

FUNCTIONAL PURPOSE

Separates mail in a post office, terminal, airport mail facility or other postal facility in accordance with established schemes, including incoming or outgoing mail or both.

DUTIES AND RESPONSIBILITIES

1. Makes primary and one or more secondary distributions of incoming mail by delivery point, (for example, classified or contract station or branch or other delivery unit, general delivery, lockboxes, rural, highway contract route, or city carrier route) based on a knowledge of the distribution scheme.

2. Makes primary and one or more secondary distributions of outgoing mail for dispatch (for example, by city, state, or region) based on a knowledge of the distribution scheme.

3. In addition, may perform any of the following duties: maintain records of mails; examine balances in advance deposit accounts; face and cancel mail; tie mail and insert facing slips; open and dump pouches and sacks; operate cancelling machines; record and bill mail (for example, c.o.d., registered, etc.) requiring special service; and provide service at public windows.

SUPERVISION

Supervisor, Distribution Operations, or other designated supervisor.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

CLERK

KEY POSITION REFERENCE

KP-0012

(End of Document)

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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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.

Response:

a. Depending on the processing needs within a given plant, rejects could be either fed for a second pass on the same machine (or perhaps a different machine), keyed on the same FSM, keyed on an FSM 1000, or sorted manually. A primary consideration that will determine the appropriate handling will be the volume of OCR read rejects. Also, a high volume of

barcoded flats could influence the decision to process the OCR read rejects on the FSM 1000 in order to have the FSM 881 available to process barcoded flats.

b. Yes.

c. A complete list of characteristics of machinable non-barcoded flats that will affect acceptance rates on FSM-OCRs has yet to be finalized. However, it is likely that many of the standards, that are already published in DMM C830 for letters, such as font type, reflectance, and print quality will also be applicable for flats.

d. Yes. The FMOCR on the FSM 881 has been tested in Palatine, Illinois. A copy of the final test report, which includes the measured acceptance rates, is attached to this response. Productivity is not covered in the report.

e. The deployment schedule is currently being finalized, so I am unable to tell you how many FSMs will be sorting mail with OCRs at the start or end of FY 1998. As I mentioned on page 13, lines 11-13 of my testimony, deployment is scheduled to begin in early Fiscal Year 1998 and continue through the remainder of calendar year 1998. I am told that page 34, lines 6 and 7, of witness Seckar's (USPS-T-26) testimony cites the average test year deployment for the FSM-OCR at approximately 40 percent of the FSM-881s currently in the field.

f. I am told that Library Reference USPS LR-H-134 reflects the costs relative to processing flats with an OCR as compared to keying the flats.

FINAL REPORT

FLATS OCR TEST
05/27/97 - 06/20/97

Final Report Flats OCR Test

Definition of Terms Used in Summary Tables

Mail Categories

O/G Prime:	A: O/G Primary
I/C Prime1:	B: I/C Primary 1
I/C Prim2:	C. I/C Primary 2
I/C SEC 1:	D: I/C Secondary 1
I/C SEC 2:	E: I/C Secondary 2

Performance Parameters

GAR: Gross Accept Rate: (Total accepts)/(total pieces fed)100

Non-chargeables: Mailpieces with sorting errors or mailpieces in the reject bins which are removed from the performance and cost model calculations. They include mailpieces with sorting errors and rejects brought about by doubles, unreadable, illegible, incomplete, blocked or non-visible addresses, addresses not in the directory, mis-faced mailpieces, and USPS caused errors or rejects.

The following parameters are exclusive of all non-chargeables:

AR: (Total mpcs accepted)/(total mpcs fed)100

AR BARCODED: (Total barcoded mailpieces accepted)/(total barcoded mpcs fed)100

AR OCR: (Total mpcs accepted without a bar code)/(total mpcs without a bar code fed)100

% OCR Mail: (Total mpcs without a bar code)/(Total mpcs fed) 100

AR SCRIPT: (Total mpcs with handwritten addresses accepted)/(total mpcs with handwritten addresses fed)100

% SCRIPT: (Total mpcs with handwritten addresses)/(total mpcs fed)100

ERR R TOT: (Total mpcs with sorting errors)/(Total mpcs accepted)100

ERR R TOT BC: (Total bar coded mpcs with sorting errors)/(total barcoded mpcs accepted)100

ERR R TOT OCR: (Total non-barcoded mpcs with sorting errors)/(total non-barcoded mpcs accepted)100

ERR R 5 D: (Total mpcs with 5 digit sorting erors)/total mpcs accepted)100

ERR R 5D BC: (Total barcoded mpcs with 5 digit sorting errors)/(total barcoded mpcs accepted)100

ERR R 5D OCR: (Total non-barcoded mpcs with 5 digit sorting errors) /(total non-barcoded mpcs accepted)100

ERR R 9D : (Total mpcs with 9 digit sorting errors)/(total mailpieces accepted)100

ERR R 9D BC: (Total barcoded mailpieces with 9 digit sorting errors)/(total barcoded mpcs accepted)100

ERR R 9D OCR: (Total non-barcoded mpcs with 9 digit sorting errors)/(total non-barcoded mpcs accepted)100

COST/KL: Cost per 1000 mailpieces to process the mailpieces according to the cost model

Weighted Cost: The average cost per 1000 mailpieces with the categories of mail weighted according to the cost model.

CUM: The cumulative results of the 19 day test by consolidating the data as if it were one large sample.

FINAL REPORT FLATS OCR TEST

		CUM	05/27/97	05/28/97	05/29/97	05/30/97	06/02/97	06/03/97	06/04/97	06/05/97	06/06/97	06/09/97	06/10/97	06/11/97	06/12/97	06/13/97	06/16/97	06/17/97	06/18/97	06/19/97	06/20/97
ORG PRIM	GAR	83.07%	77.87%	84.71%	79.72%	82.49%	81.63%	80.37%	80.25%	85.83%	82.46%	84.17%	85.64%	81.57%	83.78%	90.28%	80.81%	83.42%	85.37%	86.30%	79.70%
	AR	84.02%	78.18%	84.88%	80.28%	89.97%	82.27%	80.55%	80.88%	86.18%	82.79%	84.87%	87.37%	82.00%	84.11%	90.46%	81.52%	84.08%	87.12%	87.00%	80.18%
	AR BARCODED	100.00%	100.00%	100.00%	100.00%	0.00%	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%	100.00%	100.00%	100.00%
	AR OCR	83.99%	77.94%	84.86%	80.18%	89.97%	82.25%	80.55%	80.83%	86.15%	82.79%	84.83%	87.37%	82.00%	84.11%	90.46%	81.42%	84.06%	87.09%	86.98%	80.14%
	%OCR Mail	99.83%														100.00%	99.41%	99.90%	99.80%	99.90%	99.80%
	AR SCRIPT	51.04%	39.16%	52.66%	50.23%	55.20%	50.00%	52.48%	44.05%	59.09%	49.71%	43.44%	42.86%	60.31%	51.80%	55.17%	45.10%	58.46%	55.47%	50.69%	53.25%
	% SCRIPT	16.41%	20.15%	16.82%	21.52%	13.34%	17.63%	23.11%	24.71%	10.79%	17.31%	14.42%	9.90%	20.19%	13.72%	11.41%	14.96%	19.40%	13.09%	14.52%	15.34%
	ERR R TOT	1.41%	2.02%	1.52%	1.12%	1.30%	1.79%	1.42%	1.09%	1.14%	1.67%	2.37%	1.16%	1.65%	1.06%	1.09%	1.26%	1.16%	2.00%	1.16%	1.12%
	ERR R TOT BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R TOT OCR	1.42%	2.04%	1.53%	1.13%	1.30%	1.79%	1.42%	1.09%	1.14%	1.67%	2.37%	1.16%	1.65%	1.06%	1.09%	1.27%	1.16%	2.00%	1.16%	1.12%
	ERR R 5D	*1.41%*	*2.02%*	*1.52%*	*1.12%*	*1.30%*	*1.79%*	*1.42%*	*1.09%*	*1.14%*	*1.67%*	*2.37%*	*1.16%*	*1.65%*	*1.06%*	*1.09%*	*1.26%*	*1.16%*	*2.00%*	*1.16%*	*1.12%*
	ERR R 5D BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 5D OCR	1.42%	2.04%	1.53%	1.13%	1.30%	1.79%	1.42%	1.09%	1.14%	1.67%	2.37%	1.16%	1.65%	1.06%	1.09%	1.27%	1.16%	2.00%	1.16%	1.12%
	ERR R 9D	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 9D BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 9D OCR	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	COST/KL	$101.45	$108.64	$101.08	$103.50	$97.10	$103.39	$103.87	$103.01	$99.41	$102.81	$102.78	$98.60	$103.31	$100.69	$96.30	$102.89	$100.98	$100.51	$98.67	$103.56
VC PRIM 1	GAR	92.88%	90.14%	93.47%	89.94%	93.50%	93.72%	92.35%	91.94%	93.61%	90.46%	93.12%	93.45%	92.51%	93.61%	97.53%	92.55%	89.83%	94.12%	94.10%	93.38%
	AR	93.17%	90.14%	93.42%	90.70%	93.47%	93.72%	92.33%	92.88%	93.62%	91.97%	93.10%	95.06%	92.48%	93.61%	97.52%	92.55%	90.25%	94.34%	94.09%	93.35%
	AR BARCODED	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	100.00%	0.00%	100.00%	0.00%	100.00%	100.00%	100.00%
	AR OCR	93.16%	90.14%	93.42%	90.70%	93.47%	93.68%	92.31%	92.86%	93.62%	91.97%	93.10%	95.04%	92.48%	93.59%	97.52%	92.51%	90.25%	94.33%	94.08%	93.32%
	%OCR Mail	99.81%														100.00%	99.47%	100.00%	99.76%	99.51%	99.52%
	AR SCRIPT	77.08%	72.73%	81.54%	67.92%	80.95%	71.43%	73.61%	77.22%	89.47%	80.00%	62.50%	79.31%	77.22%	86.05%	86.21%	77.27%	77.94%	85.00%	80.00%	73.53%
	% SCIPT	12.19%	9.30%	10.48%	14.93%	10.55%	11.48%	18.41%	20.84%	8.39%	19.39%	8.90%	7.16%	19.17%	11.00%	8.53%	5.85%	17.00%	9.43%	12.32%	8.08%
	ERR R TOT	1.54%	1.88%	1.08%	1.24%	1.61%	1.46%	3.05%	2.56%	0.94%	2.41%	0.82%	0.52%	1.31%	1.64%	0.46%	2.59%	1.66%	2.50%	0.79%	1.27%
	ERR R TOT BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R TOT OCR	1.54%	1.88%	1.08%	1.24%	1.61%	1.46%	3.06%	2.56%	0.94%	2.41%	0.82%	0.52%	1.31%	1.64%	0.46%	2.59%	1.66%	2.50%	0.79%	1.28%
	ERR R 5D	1.54%	1.88%	1.08%	1.24%	1.61%	1.46%	3.05%	2.56%	0.94%	2.41%	0.82%	0.52%	1.31%	1.64%	0.46%	2.59%	1.66%	2.50%	0.79%	1.28%
	ERR R 5D BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 5D OCR	1.54%	1.88%	1.08%	1.24%	1.61%	1.47%	3.06%	2.56%	0.94%	2.41%	0.82%	0.52%	1.31%	1.64%	0.46%	2.60%	1.66%	2.51%	0.79%	1.28%
	ERR R 9D	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 9D BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 9D OCR	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	COST/KL	$88.50	$70.68	$87.78	$89.57	$88.43	$88.09	$70.91	$89.97	$87.36	$70.30	$87.37	$88.08	$88.82	$88.38	$84.55	$70.19	$70.35	$89.07	$87.00	$88.06
VC PRIM 2	GAR	94.61%	92.61%	83.07%	94.78%	96.00%	96.90%	95.00%	95.49%	97.00%	95.33%	96.04%	96.34%	96.51%	97.59%	97.51%	91.61%	93.52%	93.35%	*96.21%*	*94.63%*
	AR	95.34%	93.18%	83.23%	95.40%	96.87%	97.09%	96.15%	96.07%	97.88%	95.90%	96.45%	96.53%	96.50%	97.98%	97.51%	92.10%	94.46%	93.71%	97.57%	95.30%
	AR BARCODED	98.81%	97.71%	99.78%	97.18%	98.79%	99.03%	98.16%	100.00%	100.00%	99.20%	97.93%	99.79%	100.00%	98.88%	99.04%	98.68%	98.85%	99.18%	97.56%	99.52%
	AR OCR	88.95%	85.39%	69.71%	90.42%	91.13%	91.94%	87.45%	90.35%	91.63%	93.19%	92.46%	93.58%	91.84%	95.84%	93.38%	83.77%	86.36%	88.63%	97.61%	88.27%
	%OCR Mail	35.16%														27.12%	35.48%	34.15%	51.72%	25.38%	37.46%
	AR SCRIPT	58.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	54.55%	72.73%	0.00%	0.00%	0.00%	0.00%
	% SCIPT	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.10%	0.00%	0.00%	1.10%	1.47%	0.00%	0.00%	0.00%	0.00%
	ERR R TOT	0.54%	0.22%	1.09%	0.52%	0.52%	0.10%	0.21%	1.26%	0.41%	0.50%	0.45%	0.31%	1.04%	1.24%	0.61%	0.15%	0.47%	0.43%	0.31%	0.21%
	ERR R TOT BC	0.20%	0.17%	0.00%	0.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27%	0.00%	0.00%	0.00%	1.41%	0.28%	0.00%	0.34%	0.00%	0.28%	0.32%
	ERR R TOT OCR	1.22%	0.33%	2.36%	0.85%	2.21%	0.40%	0.90%	3.29%	1.74%	0.71%	1.72%	0.60%	2.54%	0.76%	1.57%	0.45%	0.75%	0.88%	0.41%	0.00%
	ERR R 5D	0.54%	0.22%	1.09%	0.52%	0.52%	0.10%	0.21%	1.26%	0.41%	0.50%	0.45%	0.31%	1.04%	1.24%	0.61%	0.15%	0.47%	0.43%	0.31%	0.21%
	ERR R 5D BC	0.20%	0.17%	0.00%	0.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27%	0.00%	0.00%	0.00%	1.41%	0.28%	0.00%	0.34%	0.00%	0.28%	0.32%
	ERR R 5D OCR	1.22%	0.33%	2.36%	0.85%	2.21%	0.40%	0.90%	3.29%	1.74%	0.71%	1.72%	0.60%	2.54%	0.76%	1.57%	0.45%	0.75%	0.88%	0.41%	0.00%
	ERR R 9D	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 9D BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 9D OCR	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	COST/KL	$85.94	$86.82	$73.75	$85.89	$85.01	$84.32	$85.03	$86.46	$84.27	$85.56	$85.16	$84.93	$85.91	$85.31	$84.78	$87.37	$86.38	$86.77	$84.31	$85.53
VC SEC 1	GAR	96.06%	97.06%	82.25%	99.54%	98.00%	98.58%	98.85%	98.40%	99.80%	83.23%	95.92%	94.58%	95.59%	98.07%	98.50%	92.80%	96.61%		98.32%	96.56%
	AR	96.71%	97.06%	88.11%	99.78%	97.84%	98.76%	99.30%	98.39%	100.00%	83.48%	96.84%	96.16%	96.40%	99.13%	98.50%	92.80%	96.86%		98.74%	96.77%
	AR BARCODED	99.05%	99.15%	99.47%	99.78%	97.82%	98.69%	99.27%	100.00%	100.00%	98.46%	96.81%	99.53%	100.00%	99.34%	99.75%	95.79%	99.35%		98.73%	99.20%
	AR OCR	85.84%	90.91%	72.86%	100.00%	100.00%	100.00%	100.00%	86.51%	100.00%	73.69%	100.00%	93.36%	89.94%	50.00%	90.00%	83.64%	86.64%		100.00%	86.36%
	%OCR Mail	17.39%														12.65%	9.32%	19.90%		0.42%	18.97%
	AR SCRIPT	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%
	% SCIPT	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.21%	0.00%	0.00%		0.00%	0.00%
	ERR R TOT	*0.91%*	*0.00%*	*1.38%*	*0.24%*	*2.70%*	*0.21%*	*0.47%*	*2.42%*	*0.59%*	*0.00%*	*0.33%*	*1.11%*	*0.86%*	*0.00%*	*1.74%*	*0.91%*	*1.89%*		*1.07%*	*0.45%*
	ERR R TOT BC	0.43%	0.00%	0.00%	0.24%	2.72%	0.00%	0.49%	0.00%	0.60%	0.00%	0.33%	0.00%	0.00%	0.00%	0.25%	0.49%	0.66%		1.07%	0.00%
	ERR R TOT OCR	3.53%	0.00%	3.92%	0.00%	0.00%	3.85%	0.00%	10.00%	0.00%	0.00%	0.00%	2.09%	2.63%	0.00%	12.96%	7.14%	7.58%		0.00%	2.83%
	ERR R 5D	0.04%	0.00%	0.69%	0.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%
	ERR R 5D BC	0.02%	0.00%	0.00%	0.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%
	ERR R 5D OCR	0.18%	0.00%	1.96%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%
	ERR R 9D	0.87%	0.00%	0.69%	0.00%	2.70%	0.21%	0.47%	2.42%	0.59%	0.00%	0.33%	1.11%	0.86%	0.00%	1.74%	0.91%	1.89%		1.07%	0.45%
	ERR R 9D BC	0.42%	0.00%	0.00%	0.00%	2.72%	0.00%	0.49%	0.00%	0.60%	0.00%	0.33%	0.00%	0.00%	0.00%	0.25%	0.49%	0.66%		1.07%	0.00%
	ERR R 9D OCR	3.35%	0.00%	1.96%	0.00%	0.00%	3.85%	0.00%	10.09%	0.00%	0.00%	0.00%	2.09%	2.63%	0.00%	12.96%	7.14%	7.58%		0.00%	2.83%
	COST/KL	$32.09	$31.36	$37.03	$30.58	$32.54	$30.70	$30.80	$33.04	$30.36	$37.62	$31.65	$32.40	$32.16	$30.41	$31.70	$33.82	$32.53		$31.21	$31.75
VC SEC 2	GAR	80.80%	88.53%	70.88%	69.68%	58.07%	96.95%	88.80%	93.68%	82.79%	69.96%	32.00%	79.74%	87.34%	99.20%	82.49%	68.57%	73.23%	91.19%	93.78%	89.20%
	AR	81.24%	90.88%	70.85%	69.67%	58.22%	97.34%	88.96%	93.68%	83.13%	69.96%	31.90%	80.47%	87.51%	99.20%	86.18%	68.57%	74.94%	91.75%	93.96%	89.56%
	AR BARCODED	84.31%	91.98%	98.21%	75.81%	83.70%	97.24%	88.96%	93.55%	72.95%	69.96%	31.73%	80.69%	94.05%	99.20%	87.35%	68.57%	90.97%	91.93%	94.64%	89.54%
	AR OCR	66.03%	85.19%	67.35%	63.87%	29.75%	100.00%	0.00%	100.00%	98.00%	0.00%	50.00%	70.00%	29.41%	100.00%	88.97%	0.00%	28.28%	91.09%	96.87%	100.00%
	%OCR Mail	16.82%														4.46%	0.00%	7.24%	18.97%	1.61%	0.20%
	AR SCRIPT	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	% SCIPT	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R TOT	4.28%	1.34%	1.71%	4.06%	12.11%	1.68%	5.29%	2.74%	1.96%	6.63%	20.90%	4.57%	5.44%	0.80%	7.51%	5.95%	8.55%	2.70%	3.43%	2.47%
	ERR R TOT BC	3.90%	1.63%	0.00%	3.25%	4.40%	1.75%	5.29%	2.80%	3.78%	6.63%	21.21%	4.86%	4.34%	0.80%	7.85%	5.95%	7.25%	2.55%	3.49%	2.47%
	ERR R TOT OCR	8.68%	0.00%	2.03%	5.00%	97.87%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	36.67%	0.00%	5.00%	0.00%	0.00%	3.26%	0.00%	0.00%
	ERR R 5D	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	ERR R 5D BC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Attachment to TW/USPS-T4-11-16 Question 13d (page 3 of 4)

ERR R 5D OCR	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ERR R 9D	4.28%	1.34%	1.71%	4.06%	12.11%	1.68%	5.29%	2.74%	1.96%	6.63%
ERR R 9D BC	3.90%	1.63%	0.00%	3.25%	4.40%	1.75%	5.29%	2.80%	3.76%	6.63%
ERR R 9D OCR	6.68%	0.00%	2.03%	5.00%	97.87%	0.00%	0.00%	0.00%	0.00%	0.00%
COST/KL	$40.68	$35.01	$44.15	$45.64	$53.37	$32.19	$37.84	$34.42	$38.73	$48.55
WEIGHTED COST	$54.65	$53.36	$58.07	$56.73	$59.02	$50.98	$53.88	$52.80	$52.85	$58.43

ERR R 5D OCR	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ERR R 9D	20.90%	4.57%	5.44%	0.80%	7.51%	5.95%	8.55%	2.70%	3.43%	2.47%
ERR R 9D BC	21.21%	4.86%	4.34%	0.80%	7.65%	5.95%	7.25%	2.55%	3.49%	2.47%
ERR R 9D OCR	0.00%	0.00%	36.67%	0.00%	5.00%	0.00%	0.00%	3.26%	0.00%	0.00%
COST/KL	$65.27	$41.16	$38.54	$30.84	$40.18	$46.87	$44.42	$35.25	$34.67	$38.11
WEIGHTED COST	$64.37	$54.98	$54.09	$50.16	$53.02	$58.07	$56.41	$48.10	$51.29	$52.96

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF TIME WARNER

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?

Response:

Clerks at flats sorters feed barcoded flats and key nonbarcoded flats to be sorted. They may also obtain flats to be sorted, sweep the machine, and handle equipment incidental to these tasks, all depending on local practice. If a console

is in BCS mode, the clerk will load without keying. I have been recently informed that when the OCR/BCS mode becomes available, the clerk will be able to choose to key a flat that would clearly reject (e.g. poorly handwritten address) if left to the OCR/BCS. The standard position descriptions for Flat Sorting Machine Operators, PS-05 and PS-06 are attached to the response.

a.

(1) An operator can handle individual pieces of mail while feeding the machine in either a keying, barcoded reading or OCR mode. They will also handle individual pieces of mail when clearing jams. They may also handle individual pieces of mail while loading feeder tables.

(2) through (11). For questions a.(2) through a.(11) see answer to TW/USPS-T4-11.

b. No

c. Operators will rotate from keying and/or feeding mail to other duties (i.e., loading feeder tables, sweeping, etc.) within the FSM operation. Operators will key or feed barcoded flats for up to 45 minutes per rotation. Therefore, I would expect an operator to spend the majority of their time feeding and/or keying. While not feeding or keying, the operator is primarily engaged in loading feeder tables and sweeping the machine. Depending upon local practice, they may also retrieve mail to be sorted, remove bands from bundles of flats to be sorted,

etc. I am therefore, unable to provide estimates of the time spent on these activities.

d. Pieces near the limits of the machinability requirements can impact productivity. I am unable to estimate the extent to which productivity is affected by each factor.

e. Local management makes decisions regarding the distribution of flats with the characteristics mentioned in 14d above. They assess the tradeoffs between mechanized flats sorting with increased jam rates and manual distribution. Additionally, some facilities prepare flats for distribution (removing them from sacks, cutting bands, etc.) in opening units before taking them to the flats sorting machine operation. Some sites will require that personnel assigned to the FSM will accomplish these tasks within that operation. I am unable to describe the extent to which these local conditions affect productivity.

f. The current FSMs are described on page 10 of my testimony and the anticipated changes that may impact productivity in the test year are described on page 13. The major changes in flats technology during the last ten years are: the conversion to a 2+2 configuration allowing more throughput, the addition of barcode readers, the introduction of the FSM1000, and other lesser enhancements designed to improve efficiency.

g. The increased use of pallets which is a major element of IMHS will continue

to improve the machinability of the flats mail base by reducing damage. It will also reduce the instance of broken bundles and thus reduce the instance of unfaced or otherwise improve the orientation of the mail at the consoles.

h. Because work hours associated with sweeping and loading cannot be directly attributed to either the keying mode or BCR mode, I am unable to tell whether productivity declined in manual keying operations between FY 1988 and FY 1996. As for total FSM productivity, there has been a decline between FY 1988 and FY 1996. However, most of this decline occurred in the early part of this period. It is possible that our efforts with the letter automation program diverted some attention from other areas such as flats processing. Further, as I mentioned on page 11, lines 12 through 14 of my testimony, the mailer participation in flats barcoding has been below expectations until just recently, which could have impacted the overall FSM productivity.

I. While I would expect each of the improvements made to FSMs to have had a positive impact on productivity, I am unable to estimate how much one could have expected average productivity to increase over this time period.

j. I am advised that engineering estimated a 13% improvement.

STD POSITION DESCRIPTION U. S. Postal Service

FLAT SORTING MACHINE OPERATOR, PS-05

FUNCTIONAL PURPOSE

Operates a single or multi-position, electro-mechanical operator paced flat sorting machine in the distribution of flats requiring knowledge and application of approved machine distribution of directs, alphabetical or geographic groupings, by reading the ZIP Code on each flat.

DUTIES AND RESPONSIBILITIES

1. Reads ZIP Code on each piece of mail. Depresses proper key/keys to enable the machine to divert each piece of mail to the proper destination. Applies a high degree of manual and visual coordination and close visual atention for sustained periods.

2. May serve for a portion of the time, on a rotation basis, as a loader and/or sweeper/tyer. As a loader: culls mail to remove nonmachineable pieces and loads mail onto ledges for processing. As a sweeper/tyer: removes mail from separations in the machine; verifies sorted mail for accuracy; ties mail into bundles or dispatches direct to sacks, pouches or other containers.

3. May perform manual distribution, not limited to flats, as required.

4. May operate other mail sorting machines using similar keypad after completion of appropriate training.

5. Performs other job-related tasks in support of primary duties.

SUPERVISION

Supervisor of unit to which assigned.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

CLERK

KEY POSITION REFERENCE

KP-0012

(End of Document)

STD POSITION DESCRIPTION U. S. Postal Service

FLAT SORTING MACHINE OPERATOR, PS-06

FUNCTIONAL PURPOSE

Operates a single or multi-position electro-mechanical operator paced flat sorting machine in the distribution of flats requiring the knowledge and application of approved machine schemes consisting of distribution of other than directs, alphabetical and geographical groupings which requires a minimum of 100 scheme or memory items.

DUTIES AND RESPONSIBILITIES

1. Reads address of each piece of mail; depresses proper key/keys to enable the machine to divert each piece of mail to the proper destination requiring a high degree of manual and visual coordination and close visual attention for sustained periods.

2. May serve for a portion of the time, on a rotation basis, as a loader and/or sweeper/tyer. As a loader: culls mail to remove nonmachineable pieces and loads mail onto ledges for processing. As a sweeper/tyer: removes mail from separations in the machine; verifies sorted mail for accuracy; ties mail into bundles or dispatches direct to sacks, pouches or other containers.

3. May perform manual distribution, not limited to flats, as required.

4. Performs other job related tasks in support of primary duties.

SUPERVISION

Supervisor, Distribution Operations, or other designated supervisor.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

CLERK

KEY POSITION REFERENCE

KP-0016

(End of Document)

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF TIME WARNER

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.

Response:

The MODS number ranges and titles for Periodicals Opening Units are as follows:

110-114 Outgoing Pref.

180-184 Incoming Pref.

Descriptions of the activities in these operations may be found in Library Reference H-147, Appendix A, Sections 110C and 180C. See also the attached standard position descriptions for a Mail Handler, MH-04 and a Distribution Clerk PS-05 enumerating the duties and responsibilities of those positions including those associated with opening unit functions.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF TIME WARNER

a.

(1) Handling individual mail pieces: Generally, opening unit activities do not include the handling of individual pieces of mail, rather they are handled in containers or in bulk quantities, i.e., bundles. Opening unit employees may have to handle individual pieces of mail if during handling, a bundle were to break.

(2) Handling individual bundles: Employees assigned to an opening unit will dump bundles onto a belt or into a container. They will distribute bundles into containers (sacks, rolling stock, etc.), and they will open bundles (i.e, remove bands, ties, string, etc.).

(3) Handling trays: Employees assigned to an opening unit will open trays (i.e., cut bands and remove sleeves/lids) and dump bundles from trays onto a belt or into another container. They will also place mail into trays after having removed bands, ties, string, etc. for subsequent processing.

(4) Handling sacks to be opened: Employees assigned to an opening unit will open and dump sacks containing mail.

(5) Handling pallets to be opened: Employees assigned to an opening unit may position a pallet within an operational area, remove shrink wrap, bands, etc. and empty the contents on to a belt or other container for subsequent handling, or they may make direct distribution of the bundles on a pallet.

(6) Handling other containers to be opened: Other containers which can be handled within an opening unit include pouches, which are handled like sacks as described in (4) above, and various kinds of rolling stock.

(7) Handling sacks of mail that has been sorted at the opening unit: Employees assigned to an opening unit will label and "drop" sacks when full or to meet dispatch schedules. They will load the full sacks onto a conveyor or some type of rolling container for transport.

(8) Handling other containers of mail that has been sorted: Employees assigned to an opening unit will remove full containers and replace them with empty ones.

(9) Handling empty equipment: Employees assigned to an opening unit will hang empty sacks on racks in preparation for distribution. They will position empty rolling stock around sortation belts. They will consolidate empty equipment and remove unneeded equipment it from the opening unit.

(10) Not handling mail or empty equipment: Employees assigned to an opening unit could be moving between activities within the opening unit, they could be on their way to retrieve mail or equipment, or they could be on their way back to the opening unit after having moved full containers of mail. They could be performing administrative functions. They could be away from the area for personal needs, etc.

b. No.

c. I would expect the majority of the time to be spent on distribution – activities 1 and 3. I am unable to estimate the percentages of time spent on the listed work elements.

d. The dock arrangements, the layout of the workroom floor, the number of floors or annexes, local labor agreements, and other local practices can all effect opening unit productivity. Since productivity is not measured in opening units, I am not able to quantify these effects.

e. One significant change that has affected Periodicals opening units' productivity is the advent of the Integrated Mail Handling System (IMHS). IMHS is a mail handling program designed to improve the overall mail handling functions within the Postal Service. Heavy emphasis is placed on the physical system elements of truck loading and unloading systems and dock transfer systems. Accordingly, customer mail preparation that is congruent with IMHS is also a component of the overall program. For instance, mail on pallets helps to streamline the overall Periodicals opening unit workload because the dumping of sacks is not required. In the future, I expect that additional material handling capabilities such as the Tray Management System will have a positive impact on opening unit efficiencies.

f. See response in 15e.

g. Increased. As I mentioned in my response to question TW/USPS-T4-4e, my opinion is that the Postal Service receives fewer sacks today than in 1986 due to the increase in palletization. As I mentioned in 15e, palletized mail helps to streamline the overall Periodicals opening unit workload which helps improve productivity.

STD POSITION DESCRIPTION U. S. Postal Service

DISTRIBUTION CLERK, PS-05

FUNCTIONAL PURPOSE

Separates mail in a post office, terminal, airport mail facility or other postal facility in accordance with established schemes, including incoming or outgoing mail or both.

DUTIES AND RESPONSIBILITIES

1. Makes primary and one or more secondary distributions of incoming mail by delivery point, (for example, classified or contract station or branch or other delivery unit, general delivery, lockboxes, rural, highway contract route, or city carrier route) based on a knowledge of the distribution scheme.

2. Makes primary and one or more secondary distributions of outgoing mail for dispatch (for example, by city, state, or region) based on a knowledge of the distribution scheme.

3. In addition, may perform any of the following duties: maintain records of mails; examine balances in advance deposit accounts; face and cancel mail; tie mail and insert facing slips; open and dump pouches and sacks; operate cancelling machines; record and bill mail (for example, c.o.d., registered, etc.) requiring special service; and provide service at public windows.

SUPERVISION

Supervisor, Distribution Operations, or other designated supervisor.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

CLERK

KEY POSITION REFERENCE

KP-0012

(End of Document)

STD POSITION DESCRIPTION U. S. Postal Service

MAIL HANDLER, MH-04

FUNCTIONAL PURPOSE

Loads, unloads, and moves bulk mail and performs other duties incidental to the movement and processing of mail.

DUTIES AND RESPONSIBILITIES

1. Unloads mail from trucks. Separates all mail received from trucks and conveyors for dispatch to other conveying units and separates and delivers mail for delivery to distribution areas.

2. Places empty sacks or pouches on racks, labels them where prearranged or where racks are plainly marked, dumps mail from sacks, cuts ties, faces letter mail, carries mail to distributors for processing, places processed mail into sacks, removes filled sacks and pouches from racks and closes and locks sacks and pouches. Picks up sacks, pouches, and outside pieces, separates outgoing bulk mails for dispatch and loads mail onto trucks.

3. Handles and sacks empty equipment; inspects empty equipment for mail and restrings sacks.

4. Cancels stamps on parcel post, operates cancelling machines, carries mail from cancelling machine to distribution cases.

5. Assists in supply and slip rooms and operates copy machine and related office equipment.

6. In addition, may perform any of the following duties: make occasional simple distribution of parcel post mail that requires no scheme knowledge; operate electric fork lifts; rewrap damaged parcels; weigh incoming sacks; clean and sweep work areas, offices, rest rooms, and trucks where work is not performed by a regular cleaner.

7. With approval of the Chief Postal Inspector, acts as an armed guard for valuable registry shipments and as a watchman and guard around post office building.

SUPERVISION

Supervisor, Distribution Operations, or other designated supervisor.

SELECTION METHOD

Senior Qualified

(Continued on Next Page)

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF TIME WARNER

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.

Response:

As noted in my testimony, cost pools generally mimic the layout of the workroom floor. However, "cost pools" are not an Operations concept and I have neither data nor experience in relating cost pools to supervision. The prescribed ratio of supervisors/managers to mail processing employees is 1 to 20. This ratio is managed on an area-wide basis so that the area can adjust the supervisory ratio to reflect inter-facility differences (e.g. multi-floor facilities, annexes, union rules, etc.) A series of memos detailing these policies in more detail is attached.

GAIL G. SONNENBERG
VICE PRESIDENT
HUMAN RESOURCES

UNITED STATES POSTAL SERVICE

September 25, 1995

VICE PRESIDENTS, AREA OPERATIONS

SUBJECT: Manager, Distribution Operations, Authorizations

As you know, Managers, Distribution Operations (MDO), are authorized based on the number of Supervisors, Distribution Operations (SDO), on a given tour. The criteria for those authorizations have remained constant, yet may not meet the needs of all locations.

On a number of occasions, issues regarding MDO authorizations have been raised including physical plant configuration, operational differences, supervisory population within a given plant, lack of a career ladder covering what may be as much as an eight-level gap, etc. The current criteria are simply not flexible enough to meet all the different needs which have been expressed.

Recently, proposed new criteria were circulated for comment. The following reflects inclusion of some of your suggestions. Other suggestions, which were not included, would further increase flexibility, but would also cause a decreased span of control for MDOs--an undesirable result.

This modified criteria for staffing retains a consistent span of control at varying MDO levels, keeps the total number of supervisors/managers allowed at the 1:20 ratio, and still manages to provide a great deal of flexibility.

A Manager, Distributions, EAS-18, will still be authorized as the fourth supervisor on a tour and supervising at least three EAS-16s. The EAS-20 will be the seventh supervisor on a tour and supervising at least six EAS-16s. The EAS-22 will be the tenth supervisor on a tour and supervising at least nine EAS-16s. The EAS-24 will be the thirteenth supervisor on a tour and supervising at least twelve EAS-16s.

Within those basic parameters, however, it will be the responsibility of the Plant Manager to establish levels of supervision which best meet the needs of that particular plant. For example, on a tour with 200 employees, a total of ten supervisors/managers would be authorized which would mean that the supervisory staffing, under the previous criteria, would have been nine EAS-16s and one EAS-22 MDO. With this authorization, the plant manager is able to change the mix to eight EAS-16s and two EAS-18 MDOs. This keeps the total number of supervisors the same while providing greater managerial flexibility.

Staffing could be changed as follows:

Total Supervisors	Previously Authorized MDOs	New Authorized
1, 2, or 3	none	none
4, 5, or 6	1-18	1-18
7	1-20	1-20

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Total Supervisors	Previously Authorized MDOs	New Authorized
8 or 9	1-20	1-20 or 2-18s
10 or 11	1-22	1-22 or 2-18s
12	1-22	1-22 or 1-20 and 1-18 or 3-18s
13	1-24	1-24 or 1-20 and 1-18 or 3-18s
14	1-24	1-24 or 2-20s or 1-22 and 1-18 or 3-18s

In any plant which chooses to implement this change, several factors must be considered. The first is that no changes may be made to encumbered positions. Only vacancies may be used. The second is that each MDO, regardless of level, is a direct report to the plant manager. This change does not add a layer of management. The third is that while the value of making these changes is added flexibility, the potential danger of decreasing the span of control by having more managers at a lower level is the potential for over-management at the unit level.

You should also bear in mind that, in plants which currently have EAS-24 MDOs, the career progression program is an additional alternative.

This change is effective immediately and should prove to be a solution for most, if not all, of the concerns which have been raised. If you have any questions regarding the foregoing, you should contact Jim Leahy at (202) 268-4191, or John Mularski at (202) 268-4179.

Gail Sonnenberg

cc: Mr. Henderson
Mr. Kane
Ms. Regan

JAMES C WALTON
VICE PRESIDENT, WORKFORCE PLANNING AND
SERVICE MANAGEMENT

UNITED STATES
POSTAL SERVICE

March 25, 1997

VICE PRESIDENTS, AREA OPERATIONS
MANAGER, METRO OPERATIONS

SUBJECT: Casual Employees in Plants

How casual employees are counted towards supervisory staffing in Plants has been a subject of discussion and concern for some time.

While casuals are only counted as a half credit towards the 1:20 ratio, the arguments for allowing full credit are familiar and sensible. Some of those arguments are the turnover rate; the need for closer supervision; the continuous training requirement; and the lack of a long term relationship. Additionally, there is continued emphasis from Headquarters on maintaining as many casuals as contractually allowable in order to benefit from the lower cost per workhour and increased flexibility.

We have decided that, effective immediately, casual employees will be counted at full credit towards determining supervisory staffing in Processing and Distribution Operations. The number of casuals counted will be the average number paid, not on-rolls, during the previous 12 months, exclusive of the Christmas period.

No additional workhours are authorized for these positions. They are to be funded from 204b hours, supervisory hours in excess of 40, and/or savings from the operations to which they are deployed resultant from closer supervision.

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FAX 202-268-3331

If you have any questions, you may contact Jim Leahy at (202) 268-4191.

James C. Walton

cc: Mr. Henderson
Mr. Maguire
Mr. Porras
Mr. Leahy
Mr. Mularski
Manager, Human Resources (Area)
Manager, In-Plant Operations(Area)
Manager, Operations Support (Area)

JAMES C. WALTON
VICE PRESIDENT, WORKFORCE PLANNING AND
SERVICE MANAGEMENT

UNITED STATES
POSTAL SERVICE

December 22, 1994

MEMORANDUM FOR AREA VICE PRESIDENTS

SUBJECT: Supervisory Staffing
Processing and Distribution Installations

As you are no doubt aware, there has been some confusion over the application of the 1 for 20 ratio of supervisors/managers to Function 1 employees in processing and distribution installations.

Even though the overall ratio must be maintained, nothing requires that it be maintained in each and every operation. Some naturally require a greater degree of supervision than others. In order to allow a certain degree of flexibility, staffing has been by tour, not by operation.

We have come to recognize that, just as some operations are different from others, so some buildings are different, or smaller, than others, and that these differences make them either more or less difficult to properly supervise.

In order to provide the greatest possible latitude in allocating supervisory staff, the current authorized numbers of Supervisors, Distribution Operations, and Managers, Distribution Operations will now be authorized area-wide as follows:

AREA	MDO/SDO CAP
Allegheny	1094
Great Lakes	1163
Mid-Atlantic	1015
Midwest	857
Northeast	864
New York Metro	1296
Pacific	1272
Southeast	1084
Southwest	811
Western	661

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The Area Vice President may redistribute these positions depending on the size and physical or operating characteristics of individual plants. You may not approve positions in excess of the above cap, and Managers, Distribution Operations must continue to be authorized, both in grade and in number, following established criteria.

My staff will monitor both the ceilings and MDO authorizations to ensure compliance, and will also be available to assist you in the event that complement growth necessitates increases to current authorizations.

James C. Walton

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: 8/19/97

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.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
August 19, 1997