

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF
DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T39-25-35)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Direct Marketing Association, Inc.:
DMA/USPS-T39-25-35, filed on November 7, 2001.

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

Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078, Fax -5402
November 20, 2001

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

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.

Response:

Supervisor activities are determined locally based on the requirements of the specific operation(s) supervised. Generic lists of Supervisor duties and responsibilities are generally included in the operation-specific handbooks listed in the response to OCA/USPS-156 and provided in the associated Library References. For example, the most recent such handbook, "AFSM 100 Standardization Supervisor's Guide", contains an especially detailed listing of daily supervisor activities for that operation. I am not able to estimate the amount of time spent in each of the myriad activities for all the different operations. Span-of-Control is determined locally based on the needs of the various operations.

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

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.

Response:

See response to DMA/USPS-T39-25.

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

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?

Response:

Typically a clerk works only on one shape of mail within a single tour.

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

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?

Response:

Typically a clerk works only on one shape of mail during an AP.

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

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?

Response:

Typically a supervisor supervises craft labor working only on one shape of mail during a single tour. Smaller facilities may have a supervisor oversee operations related to more than one shape (e.g. manual flats and manual letters).

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

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?

Response:

Typically a supervisor will supervise craft labor working on one shape of mail during an AP. See DMA/USPS-T39-29.

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

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.

Response:

Initial training for a new supervisor at a P&DC is locally determined. However, the Associate Supervisor Program (ASP) is often used. This 16-week program consists of 80 hours of classroom training in the first two weeks with a split of one day in the classroom and four days of on-the-job training for each week during the remainder of the program. An individual facility may not use the entire program or may supplement it with other material. Handbooks available to the Supervisor were listed in the response to OCA/USPS-156 and provided in the associated Library References. The following ASP materials are provided in USPS-LR-J-181:

7610040007992.pdf	ASP, Processing and Distribution, Participants Guide July, 2001 (Rev. 1996, 1997, 1998, 2000)
Td-41d-2.pdf	ASP, Leadership & Mgmt., Weeks 1&2, Part. Guide Sept. 1998 (Rev. 1996, 1997)
Td-41g-2.pdf	ASP, Assuming Resp. for Sup., Part. Guide Sept. 1998 (Rev. 1996)
Td-41b-2.pdf	ASP, Coach & On-Site Trainer Cert. Training Sept, 1998 (Rev. 1996)

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

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.

Response:

Each Supervisor is required to attend at least 20 hours of training per year. Training for each Supervisor is determined locally based on the needs of the individual Supervisor and the organization. The training can consist of classroom instruction, videos, online instruction and attendance at selected conferences. Due to the extraordinary range of the locally determined training, I am unable to provide the requested Library Reference.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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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.

Response:

See DMA/USPS-T39-31.

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

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

- (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.

Response:

- a. Yes. That is feasible.
- b. Yes. That is feasible.
- c. No. However, as I explained in Chapter 3 of my testimony, your premise that “costs can be fully variable with respect to volume changes as volume increases” is generally invalid for mail processing operations.

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

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?

Response:

- a. Support of this statement comes from personal experience in managing a facility, conducting and implementing numerous staffing and scheduling changes, and coordinating the implementation of new equipment for mail processing facilities.
- b. No. The same supervisory hours would not be required for both 75 manual clerks or 3 automation clerks. However, it is also true that the supervisory hours required for 75 manual clerks would not suffice for 75 automation clerks (e.g. operating 37 DBCSs) As I explained in the paragraph of my testimony that you excerpted, volume is only one factor.
- c. See the Corporate Automation Plan provided in USPS-LR-J-156, the Decision Analysis Reports (DARs) for letter automation in USPS-LR-J-157, and the Letter

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Recognition Enhancement Program (LREP) in USPS-LR-J-62. The number of manual and automated sorts over time is not available.

- d. See Publication 128 provided as USPS-LR-I-193 in R2000-1, which provides a chronology of the automation of flats. The number of manual and automated sorts is available from responses to DMA-T39-5 and 14, and MH/USPS-T10-26 and ANM/USPS-T10-33 from Docket No. R2000-1.
- e. It has increased. I am told that the ratio of supervisory work hours (LDC 10) in mail processing to clerk and mail handler hours (LDC 11 through 19) was approximately 1 to 16 in FY 1995. In July, 2001, I am told that the same ratio was 1 to 14.5.

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.

Joseph K. Moore

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Washington, D.C. 20260-1137
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