

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

INTERROGATORIES OF AOL TIME WARNER INC.  
TO THE UNITED STATES POSTAL SERVICE (AOL-TW/USPS-30-32)  
(November 21, 2001)

Pursuant to sections 25 and 26 of the Rules of Practice, AOL Time Warner Inc. (AOL Time Warner) directs the following interrogatories to the United States Postal Service.

Respectfully submitted,



John M. Burzio  
Timothy L. Keegan

Counsel for  
AOL Time Warner Inc.

Burzio & McLaughlin  
Canal Square, Suite 540  
1054 31st Street, N. W.  
Washington, D. C. 20007-4403  
tel/(202) 965-4555  
fax/(202) 965-4432

## SIXTH SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE

AOL-TW/USPS-30 In Docket No. R2000-1 the Postal Service filed USPS library reference LR-I-88, titled 'Flats Bundle Study'. LR-I-88 is relied upon also in the present docket. Several of its numbers are used in the flats mail flow models in LR-J-61 sponsored by witness Miller.

LR-I-88 contains a spreadsheet called 'FINAL\_Density.XLS', which describes the downflows from bundle sorting operations of bundles at different presort levels from containers at different presort levels. The purpose of the following questions is to determine the proper interpretation of the bundle downflow percentages presented on worksheet 'Final Down Flows' in that spreadsheet.

- a. Please confirm that the percentages shown represent weighted averages for flats bundles from sacks and pallets and from different mail classes. If not confirmed, please explain.
- b. Please confirm that the percentages shown represent weighted averages for mechanized and manual bundle sorting operations. If not confirmed, please explain.
- c. Please confirm that for each container presort level (MADC [Mixed ADC], ADC, 3D, 5D and Carrier Route) the percentages shown describe the further disposition, after bundle sorting, of bundles at each presort level from containers with the given presort level. If not confirmed, please explain.
- d. Please confirm that, for each applicable combination of container and flats bundle presort level, the numbers on the line called 'Piece' represent the percentages of such bundles that after the bundle sort would be brought directly to a flats piece sorting operation. If not confirmed, please explain.
- e. Please confirm that for 5-digit bundles that are in 3-digit containers at the start of the bundle sort, 21.69% are shown as going directly to a piece sorting operation. Please also confirm that the remaining 78.31% are shown as going to a 5-digit bundle sorting operation. If not confirmed, please explain.
- f. Please confirm that when in a 3-digit bundle sort operation one and only one container receives the bundles going to a given 5-digit zone, that container will receive a mixture of 5-digit and carrier route bundles, requiring a further bundle sort. Please confirm also that such 5-digit bundles are included in the 78.31% referred to in part e of this interrogatory. If not confirmed, please explain.

AOL-TW/USPS-31 Please refer to the bundle sorting density data from USPS LR-I-88.

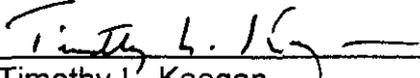
- a. Please confirm that a bundle with MADC (Mixed ADC) presort that is sorted from an MADC container is shown as always going directly to piece sorting at the end of the bundle sort. If not confirmed, please explain.
- b. Please confirm that a bundle with ADC presort that is sorted from an MADC container is shown as never going directly to piece sorting and always requiring a subsequent ADC bundle sort. If not confirmed, please explain.
- c. Please confirm that in the case of 3-digit bundles sorted from MADC containers, 6.18% are shown as going directly to piece sorting, while 74.45% go to an ADC bundle sort operation and the remaining 19.38% go to a 3-digit bundle sort operation. If not confirmed, please explain.

AOL-TW/USPS-32 Please refer to the bundle sorting density data from USPS LR-I-88. That library reference contains a spreadsheet titled 'SUMMARY.XLS', which contains, separately for Standard A and Periodicals flats bundles, the estimated average number of handlings involved in sorting a bundle with a given presort level from a container at a given presort level.

- a. Please confirm that the numbers in 'SUMMARY.XLS' represent weighted averages for mechanized and manual bundle sorting operations. If not confirmed, please explain.
- b. Please confirm that for a given combination of container and bundle presort levels, and a given class, the number of handlings shown in spreadsheet 'SUMMARY.XLS' is the number of handlings required to achieve the corresponding bundle downflows shown in spreadsheet 'FINAL\_Density.XLS'. If not confirmed, please explain.
- c. Please confirm that, in the case of Periodicals, an average of 1.17 bundle sorts is required before a bundle with MADC sort level, from an MADC container, can be sent to piece sorting. If not confirmed, please explain.
- d. Please confirm that, in the case of Periodicals, an ADC bundle in an MADC container requires an average of 1.1 bundle sorts before reaching its proper ADC container. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.

  
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Timothy L. Keegan

November 21, 2001