

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 AOL TIME WARNER, INC.
(AOL-TW/USPS-T39-15-19)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of AOL Time Warner, Inc.: AOL-TW/USPS-T39-15-19, filed on November 9, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 21, 2001

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AOL-TW/USPS-T-39-15 In response to AOL-TW/USPS-T39-5f you refer to “the AFSM 100 National Standardization Guide.” Is that document available in the present docket? If yes, please provide a reference. If not, please provide a copy.

RESPONSE: Yes. See USPS-LR-J-173 in response to OCA/USPS-156.

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AOL-TW/USPS-T-39-16 Please refer to your response to AOL-TW/USPS-T39-7, where you say that the FSM-1000 will have one automated feed and three keying consoles in the test-year configuration.

- a. Is the target 7000 pieces-per-hour throughput capacity referred to on page 15 in your testimony expected to come from running flats through the automated feeder only?
- b. Will the one automated feeder and the three keying consoles be used simultaneously in normal operations?
- c. What is the maximum FSM-1000 throughput based on the speed of the FSM-1000 belt?
- d. What kinds of flats will be keyed on the FSM-1000 keying consoles?
- e. Will attempts be made to run flats that are rejected in the automated feed mode through the machine again using the keying mode?
- f. How many employees will staff an FSM-1000 under normal operating conditions and how will the work be divided between them?

RESPONSE:

- a. Yes.
- b. No. The machine will be run in only one mode at a time, either using the feeder or using the keying consoles. The majority of the time the automated feeder is expected to operate without the keying consoles being used simultaneously.
- c. The theoretical maximum throughput depends upon mail piece length and absolutely ideal conditions (i.e., no jams, no mechanical problems, no breaks, maintenance personnel standing-by at the machine, etc.). Maximum throughput of mail with the maximum length (15.75 inches) is approximately 12,000 pieces per hour. For mail with the minimum length (4 inches), 19,000 pieces per hour is the theoretical maximum throughput.

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- d. Non-OCR readable or non-feedable flats.
- e. Yes.
- f. See my testimony page 15, lines 16-18, which states the maximum staffing is expected to be five with the AFF/OCR enhancement. Specific work assignments have not yet been determined and are expected to be determined during first-article testing planned for January 2002 in Boston.

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AOL-TW/USPS-T-39-17 In your response to AOL-TW/USPS-T39-14 you commented on the sortation at a delivery unit of bundles of carrier route presorted flats from either a 5-digit pallet or a 5digit hamper. You pointed out that in this type of sortation bundles are normally not thrown into receptacles but “typically placed into flat tubs or other containers where breakage should not be an issue at this point.” And in response to part e of that interrogatory you confirmed that packages at this point are sorted “not by throwing but by placing the package on the carrier’s ledge, or on a shelf or in a cubbyhole designated for that carrier so that the possibility of package breakage does not occur.”

Please comment on the corresponding situation where the carrier route packages are contained in a carrier routes sack, rather than a hamper or pallet.

- a. Please confirm that the term “carrier routes sack” normally refers to a 5-digit sack containing carrier route presorted bundles, going to more than one carrier route within the given 5-digit ZIP code area. If not confirmed, please provide an alternative definition.
- b. Assume that a bundle inside such a sack has broken during transport and is not easily recoverable. What would the clerk handling this mail normally do with the pieces from this bundle? In particular, what is the likelihood that he would do each of the following?
 - (1) Bring each loose flat to the appropriate carrier,
 - (2) Collect the loose flats and take them to a manual incoming secondary flats case at the DDU.
 - (3) Collect the loose flats and return them for incoming secondary sortation at the main office.
 - (4) Any other action not listed above. Please explain fully.
- c. Would the contents of this sack normally be dumped on a table or opening belt before sorting the bundles to each carrier, or would the clerk sort directly from the sack?
- d. Would the clerk distributing the contents of a carrier routes sack to the carriers normally have scheme knowledge?
- e. Assume that instead of being carrier routes, a sack is labeled as being only for a single carrier. Would the clerk handling it in that case take the sack’s contents, including any loose pieces from broken bundles, directly to the receptacle for the appropriate carrier, rather than mix it with mail going to other carriers? If no, please explain why not.

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RESPONSE:

- (a) Confirmed.
- (b) The clerk or mailhandler is likely to follow the action described in (2) and unlikely to follow the other actions.
- (c) The contents would normally be dumped before sorting the bundles.
- (d) Though the packages would be labeled via a facing slip or OEL with carrier route information, scheme-qualified clerks typically distribute the packages. In some instances, nonscheme-qualified clerks or mailhandlers would distribute carrier route bundles from a carrier routes sack or pallet.
- (e) Yes. The contents of a carrier route sack will be kept separate upon removal and then distributed to the carrier's case.

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AOL-TW/USPS-T-39-18 In your response to AOL-TW/USPS-T39-14, part c, you indicate that any loose pieces found in a 5-digit hamper at a DDU are likely to be recovered by a clerk rather than a carrier, because “volume has to be measured prior to being cased by the carrier.”

- a. Does the statement mean that all volume going to every single carrier has to be measured?
- b. Why does volume have to be measured prior to being cased by the carrier?
- c. What postal data system do the measurements of mail volumes going to carriers belong to?
- d. What precisely does the clerk who handles mail before it goes to a carrier measure and record regarding the volume to that carrier?

RESPONSE:

- a. All flat and non-DPS letter volumes for city carriers are measured daily.
- b. Volume is measured to get an idea of carrier workload to determine if they may need assistance or are able to assist another route. For example, if the last route inspection showed 15 feet of mail for the route to be completed in 8 hours, and the carrier has 25 feet today, the carrier may need assistance.
- c. Volumes go into the Delivery Unit Volume Recording System (DUVRS) which are fed into the Delivery Operations Information Sub-system (DOISS) computer at each delivery unit, and are then fed into the FLASH reporting system.
- d. Usually the carrier supervisor measures the linear feet of flats and non-DPS letters at the carriers' cases before the carriers start the route. Volumes continue to be recorded as addition mail is given to the carriers after they have started casing.

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AOL-TW/USPS-T-39-19 In your response to AOL-TW/USPS-T39-5, part e, you indicate that an AFSM typically may run 3 or 4 incoming secondary schemes at the same time.

- a. Will the same 3-4 schemes normally be worked together every night, or may it change from night to night?
- b. How often will a facility revise its incoming secondary sort plan?

RESPONSE:

- a. Normally every night.
- b. AFSM incoming secondary sort plans are updated on an accounting period basis or as needed such as when there are changes to route territory. High growth areas usually update FSM sort plans weekly to ensure mail for all the new delivery points are sorted to carrier route instead of being sent as 5-digit working mail for the delivery unit to work.

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.

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