

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 MILLER  
TO INTERROGATORY OF KEYSpan ENERGY  
(KE/USPS-T22-22)

The United States Postal Service hereby provides the response of witness Miller to the following interrogatory of KeySpan Energy: KE/USPS-T22-22, filed on November 19, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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December 3, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF KEYSpan ENERGY

**KE/USPS-T22-22** Please refer to page 39 of your Direct Testimony where you indicate that the productivity for “riffing” letters was used as a proxy for manual counting.

- A. Please briefly describe the “riffing” operation (MODS operation 029).
- B. Please describe and explain all the reasons that postal clerks “riffle” through trayed mail letters.
- C. What is the manual sorting productivity that you referred to at that point in your Direct Testimony and what MODS operation covers such activity.
- D. Please describe the specific activities and operations entailed in searching for mis-sorts. Please be sure to indicate whether the trays in which postal clerks are sorting for mis-sorts are addressed to one recipient or numerous recipients.
- E. Please describe how the FY2000 “riffing” productivity of 2,134 pieces per hour was adjusted by a volume variability factor to arrive at the productivity used in your cost model.
- F. Please explain why you did not simply perform a study, similar to the one you performed for counting by weighing techniques, in order to obtain directly the productivity for counting letters.
- G. Please explain why you believe your estimate for counting letters is more accurate than the KeySpan study presented in Docket No. R00-1, which resulted in a higher productivity of 2,746 pieces per hour.

**RESPONSE:**

- (A) Please see USPS-T-22, page 39 at 4-5.
- (B) It depends on the site, but it is my understanding that clerks could use the riffing operation to cull out mail pieces that are nonmachinable, mis-oriented, or mis-sorted.
- (C) Please see Docket No. R2000-1, USPS-T-29, page 16, footnote 6. The activities are likely performed in a postage due operation represented by MODS operation number 930.
- (D) The example I use in my testimony for riffing operations is not meant to denote a specific procedure that is used nationally to detect mis-sorts. The

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**RESPONSE TO KE/USPS-T22-22 (CONTINUED)**

culling of mis-sorts was simply an example I use to illustrate why clerks might engage in riffling activities. For example, I observed clerks at one plant riffling through trays of remittance mail destined for several local banks before that mail was delivered. This task was performed to ensure that mail pieces were not mis-routed to the incorrect remittance processing facility.

- (E) My testimony relies on the Postal Service volume variability cost methodology. Consequently, I adjusted the actual MODS productivity by a volume variability factor for postage due operations in order to derive the "marginal productivity." Please see USPS LR-J-60, page 103.

Marginal Productivity = MODS Productivity / Volume Variability Factor

Marginal Productivity = 2,134 pieces per hour / 0.94

Marginal Productivity = 2,270 pieces per hour

- (F) Predetermined time systems, like Methods Time Measurement (MTM), are typically used when there is no other data available or it is necessary to avoid the performance rating process associated with standard time studies. Given that MODS data are available for the riffling operation, an MTM analysis was not conducted.
- (G) It is my understanding that the KeySpan study was not an industrial engineering study and did not fully address the operational realities of the postal mail processing environment. For example, elements related to operation setup and teardown were not included.

## **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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Michael T. Tidwell

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