

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, 2001

Docket No. R2001-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AOL TIME-WARNER, INC.
(AOL-TW/USPS—30-32)**

The United States Postal Service hereby provides responses to the following interrogatories of AOL Time-Warner, Inc: AOL-TW/USPS—30-32, filed on November 21, 2001.


The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 5, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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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 described 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 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.

RESPONSE:

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- a. Confirmed.
- b. Not confirmed. The downflow densities are based on mechanized bundle sorting operations only.
- c. Confirmed.
- d. Confirmed.
- e. Confirmed.
- f. Confirmed.

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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.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.

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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.

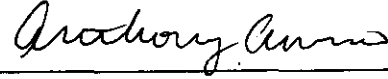
- a. Please confirm that the numbers in 'SUMMARY.XLS' represent weighted averages for mechanized and manual bundle sorting operations. If not confirmed, please explain.
- b. Please confirm that for a given combination of container and bundle presort levels, and a given class, the number of handlings 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.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d. Confirmed.

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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