

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

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997


DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA
TO USPS WITNESS MODEN
(MPA/USPS-T4-1-11)**

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS witness Moden (MPA/USPS-T4-1-11).

Respectfully submitted,



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**INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
TO UNITED STATES POSTAL SERVICE WITNESS MODEN**

MPA/USPS-T4-1. Please refer to your response to TW/USPS-T4-7, part c. You state that “We staff to workload”.

- a. Please describe in detail the chain of command for staffing decisions. Do facility managers make all decisions for their facility? Please describe in detail all circumstances in which staffing decisions are made at a more centralized level, such as area distribution center, or at a more decentralized level, such as at a supervisory (operation) level within a facility
- b. For what time period are staffing levels set? Please describe in detail how changes in staffing levels are transmitted to facility personnel. What is the lead time for staffing changes?
- c. Please define precisely the workload you refer to as the basis for staffing decisions. Is this a historical or anticipated workload? Please describe how schedulers obtain the workload information. Is such information provided as one workload figure or as a range?
- d. Does the Postal Service use any other staffing tools (computer based or otherwise) in making scheduling decisions? If yes, please list all such tools, briefly describe each, and provide supporting documentation.

MPA/USPS-T4-2. Please refer to your response to TW/USPS-T4-7, part h., where you describe the META staffing system. You state that META is used at local discretion to adjust local staffing.

- a. Please provide an estimate of the number of facilities using the META system in FY 1996.
- b. Can facilities use the META system on an occasional basis?
- c. Has the Postal Service conducted any studies or written any reports evaluating the effectiveness of the META system? If so, please provide copies of any such studies or reports.

MPA/USPS-T4-3. Please refer to your response to TW/USPS-T4-8, part c.

- a. Please provide a precise definition of activities and areas that are part of the opening unit function.
- b. Please reconcile your statement in part c. that MODS operations 110-129 always mean opening unit with your statement in part f. of the question that operations 120-129 are pouching operations

MPA/USPS-T4-4. Please refer to your response to TW/USPS-T4-9, parts a. and e.

- a. Please explain why an employee clocked into a MODS mail processing operation who is observed by an IOCS clerk as doing window service or administrative work is not violating proper clocking in and out procedure.
- b. Is it possible for clerks to move frequently between window or administrative operations and mail processing or to engage in window or administrative operations and mail processing almost simultaneously?

MPA/USPS-T4-5. Please refer to your testimony at page 10 on non-carrier route barcoded flats. Please provide a breakdown of barcoded flats by class for 1995, 1996, 1997, and 1998.

MPA/USPS-T4-6. Please refer to your testimony on page 11 with respect to the percent of incoming secondary volume processed on the flat sorter. Please provide the precise percentage of machineable incoming secondary volume processed on the flat sorter.

MPA/USPS-T4-7. Please refer to your testimony on pages 11-12 with respect to the peculiar outputs from the cost models for barcoded and nonbarcoded Periodicals. Please explain any relationship between the enigmatic results of the barcoded/nonbarcoded cost models to the anomalous results for Periodicals costs in general, as described by Witness O'Hara.

MPA/USPS-T4-8. Please refer to your testimony at page 13. You state that you expect to develop solutions to the enigmatic cost model results for Periodicals and Standard (A) Nonprofit mail in time for the implementation of new rates. Please explain whether you mean operational solutions or cost measurement solutions.

MPA/USPS-T4-9. On page 13 of T-4 you describe future flat sorting equipment. You do not describe any replacement equipment for the FSM 881. Please describe any studies, tests or evaluations currently underway or planned for the near future on possible replacement machines for the FSM 881.

MPA/USPS-T4-10. On page 13 of your testimony you describe a high speed flats feeder for the FSM 881 and a barcode reader for the FSM 1000.

- a. Please describe the results of the field test on the HSFF. Please estimate the increase in throughput for an FSM 881 equipped with an HSFF and provide a cost estimate for retrofitting all FSM 881 machines with HSFFs.
- b. Please describe the results of the field test on the FSM 1000 BCR modification. Please estimate the increase in throughput for a FSM 1000 equipped with BCR and provide a cost estimate for retrofitting all FSM 1000s with BCRs.

- c. Assuming the Board of Governors approves deployment of BCRs for the FSM 1000, please describe when deployment is likely to be completed for the first 100 FSM 1000s and for all 340 FSM 1000s.

MPA/USPS-T4-11. Please refer to page 16, lines 23-26 of your testimony. Please explain in detail the manner in which MODS-dependent “calculations” are used by local management in making local staffing and scheduling decisions.

MPA/USPS-T4-12. Please refer to your testimony at page 20 where you discuss the effect of labor agreements on staffing changes. Please confirm that the seniority based bidding process which cascades through the facility limits the Postal Service’s ability to match staff to workload in a timely manner.

MPA/USPS-T4-13. Please refer to page 21 of your testimony where you describe how manual cases must be staffed to handle rejects from automation operations. Please describe what employees assigned to manual cases do while awaiting late surges of reject volume.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



James R. Cregan

Washington, D.C.
September 17, 1997