

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

RECEIVED

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORY OF
TIME WARNER, INC.
(TW/USPS-T4-25)

The United States Postal Service hereby provides the response of witness Moden to the following interrogatory of Time Warner, Inc.: TW/USPS--T4--25, filed on September 11, 1997. Interrogatories TW/USPS-T4-22-24 were redirected to the Postal Service.

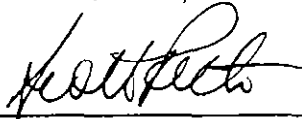
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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September 25, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF TIME-WARNER**

TW/USPS-T4-25 The Postal Inspection Service report "National Coordination Audit - Allied Workhours" (December 1996), included in LR-H-236, discusses problems associated with the lack of performance indicators for allied labor (LDC 17) operations and argues that this often causes inadequate control of LDC 17 workhours. It states, for example, that

"LDC 17 supervisors generally expressed that their focus was to keep the employees in budgeted positions "busy" (page 10).

It recommends (pages 14-15) that

"productivity benchmarks should be developed for each LDC 17 operation that does not directly support mail distribution operations."

- a. For each type of letter, flat and parcel automated, mechanized and manual distribution operation, please describe the allied labor functions that "directly support" that type of distribution. Please also indicate which of those functions, in your experience, are currently being recorded in MODS as part of the respective distribution operations and which are currently normally recorded as part of LDC 17.
- b. Please describe the allied labor (LDC 17) operations that do not "directly support specific distribution operations. Please also identify the MODS operation numbers normally used for each such operation.
- c. Is distribution of small (less than one pound) parcels generally performed as part of LDC 17 functions? If no, where is such distribution normally performed? What MODS operation numbers are normally used for distribution of small parcels?
- d. Please describe the types of LDC functions that can be performed by clerks, the functions that can be performed by mailhandlers and the functions that can be performed by either craft. If this depends on the type of facility, or its geographic location, please explain fully.
- e. Do all post offices where mail processing is performed use both clerks and mailhandlers? If no, describe the types of offices that use only clerks and those that use only mailhandlers.

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Response:

- a. See the list of Allied Labor functions in section 312.112 of LR-H-147. Those functions may also be performed in direct support of a distribution operation. When performed in direct support of a distribution operation, (i.e. the employee is dedicated to performing the function(s) for a single operation rather than multiple operations in succession), those hours are to be reported under the operation they are supporting and thus reported under the appropriate LDC for the distribution operation. Lists of the functions performed in MODS operation may be found in Appendix A within LR-H-147.
- b. LDC 17 is "Mail Processing – Other Direct Operations". It is used for all nonsupervisory hours of employees involved in mail processing operations other than distribution. These operations include mail preparation, presort operations, traying and sleeving, opening, pouching and traying, and platform operations. LDC 17 is also used for the Air Contract Data Collection System and at the BMCs for forklift operators and dock clerks. As indicated in a. above, allied labor operations generally contain functions that might be performed in support of specific distribution operations. However, it is unlikely that functions of 010-019, Cancellation, or 118-119, ACDCS, would be performed in direct support of a single distribution operation.
- c. No. Mechanized and manual distribution of parcels is performed in LDCs 13 and 14 respectively. Manual parcels are sorted in operations 50, 55, 100, 102, 103, 130,

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and 200. Mechanized parcels are sorted in operation 105, 107-108, 138-139, and 346-347.

- d. LDCs are not directly related to craft. Both clerks and mailhandlers can be clocked against each of the Mail Processing LDCs, 11-18. For example, any clerk or mailhandler primarily involved in or directly supporting the manual distribution of letters, flats, and parcels would be clocked in LDC 14.
- e. Not necessarily. Although all offices surveyed in the audit that is the subject of this question would have both clerks and mailhandlers, some very small offices (e.g. with a single CSBCS) might not have mailhandlers, and mail concentration points (e.g. a HASP) might not have clerks.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/25/97

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.



Scott L. Reiter

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