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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

MOTION FOR LATE ACCEPTANCE OF AND RESPONSE OF UNITED STATES
POSTAL SERVICE WITNESS MODEN TO INTERROGATORY OF
TIME WARNER, INC. TW/USPS-T4-22(F))
AND CORRECTION OF COVER SHEETS

The United States Postal Service hereby provides the response of witness Moden to the following interrogatory of Time Warner, Inc.: TW/USPS-T4-22(f), filed on September 11, 1997. The interrogatory is stated verbatim and is followed by the response. This interrogatory was inadvertently omitted from the set filed yesterday and the Postal Service requests that it be accepted one day late. The declaration filed yesterday with witness Moden's response to interrogatory 25 applies to 22(f) as well.

The cover sheet for the Postal Service's responses interrogatories TW/USPS-T4-22-24, redirected from witness Moden and filed yesterday should be corrected to indicate that 22(a)-(e) were redirected to the Postal Service, rather than all of 22.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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Scott L. Reiter

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September 26, 1997

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

TW/USPS-T4-22 Please refer to the Postal Inspection Service report named National Coordination Audit - Allied Workhours (December 1996) that is included in LR-H-236. The report refers, in the executive summary and at pages 10-12, to Regional Instruction (RI 399) issues. It defines RI 399 as "an understanding between the Postal Service and the clerk and mail handler unions regarding specific allied labor assignments" (Page 1, Footnote 2).

a. Does RI 399 refer to agreements that may differ between one part of the country and another? If they are different, how many different RI 399 agreements are there?

b. What are the most typical "RI 399 issues? Do they, for example refer to what kind of work can be done by clerks and what can be done by mailhandlers? Do they refer to what can be done by casual and/or transitional employees? Please explain as fully as possible.

c. What kinds of restraints do RI 399 agreements place on management's ability to assign employees where they would be of most use at a given point in time? Please explain as fully as possible.

d. The report recommends, and USPS management appears to have concurred, that "a consistent approach toward RI 399 issues is needed to help minimize the impacts of local agreements on plant operations" (Page 11). Please explain what progress has been made in this area since the Inspection Service issued its report

e. Please provide copies of typical RI 399 agreements and, if possible, provide copies of all such current agreements.

f. On page 12 the report refers to a study being undertaken by Headquarters Strategic Operations Planning, of costs per workhour, that it was hoped would "help to identify the true costs of craft work restrictions." AP 4 FY97 is indicated as the target date. Please indicate whether this study has been completed and if so, describe its findings. If there exists a written report, please provide a copy.

Response:

a.-e. These questions have been redirected for a USPS response.

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f. It is my understanding that the study was completed but was unable to identify the cost of craft work restrictions. No written report of the study was prepared.

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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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