

DOCKET SECTION

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MODEN TO INTERROGATORIES OF  
TIME WARNER, INC.  
(TW/USPS-T4-26-28)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of Time Warner, Inc.: TW/USPS-T4-26-28, filed on September 15, 1997.

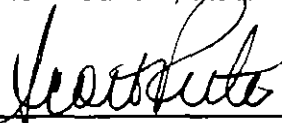
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Rate Making

  
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Scott L. Reiter

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September 29, 1997

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

TW/USPS-T4-26 Please refer to your answer to TW/USPS-T4-7h. In that interrogatory you were asked to identify all computerized tools used by postal facility managers to staff and schedule their mail processing operations. You identified only one such tool, namely the Site META program, for which a User's Manual was provided as Library Reference H-221 under protective conditions.

Please refer also to Library Reference H-255, which describes a 1991 study in which the contractor evaluated various USPS Models and concluded (on page 2-1) that: "Two of the models examined dealt specifically with staffing and scheduling issues; The Annual Staffing and Resource Management Simulator (ASRMS) and the Post Office Scheduler (POSKED)."

a. Are you familiar with (1) the ASRMS; and (2) the POSKED programs?

b. Why did you omit references to both of these programs in your response to TW/USPS-T4-7h?

c. In your opinion, is the Site META program a more suitable tool for staffing and scheduling of mail processing in today's environment than the ASRMS and POSKED programs? Please explain your answer.

d. Based on your experience, to what extent are the ASRMS and POSKED programs being utilized for staffing and scheduling of mail processing, activities today? If they are not used today, or are being used less than in the past, please *explain*.

e. According to LR-H-255, at page 2-2, POSKED can be run in three modes. To the extent POSKED is still used in postal facilities, in which mode is it normally run?

f. Does a written manual for POSKED exist? If yes, please provide a copy.

g. Does a written manual for ASRMS exist? If yes, please provide a copy.

**Response:**

a. I am aware of those programs.

b. They are no longer nationally supported programs, and I have no knowledge of their continuing use.

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- c. Although I am not an expert in the use of such tools, I would say that Site META is a more suitable tool based upon the Postal Service's decision to use it and considering that the other two programs referred to are no longer supported.
- d. See answers to b and c above.
- e. See answers to b, c, and d above.
- f. A search of the USPS Headquarters Library was conducted, but we were unable to find a POSKED manual.
- g. A search of the USPS Headquarters Library was conducted, but we were unable to find a ASRMS manual.

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TW/USPS-T4-27 Please consider the following hypothetical. A manual flat sorting operation (e.g., 060) in a mail processing facility is staffed by 10 clerks. Assume that experience in that facility is that the average productivity during a tour is 400 flats per manhour. At a certain point, 3,000 flats are available for processing and the next batch, based on normal mail arrival patterns is expected in one hour. During that hour, the clerks sort the 3,000 flats, so as to be *ready* for additional mail when it arrives. At a certain later point, one hour before the first critical dispatch there are 5,000 flats, which therefore need to be processed within the next hour, and the supervisor urges the clerks to make an extra effort during that hour so as to not miss service commitments.

a- Based on your experience, is it not likely that the clerks during that "surge" period, given the urgency and the fairly light workload earlier in the tour, will make an extra effort and achieve a somewhat higher productivity than the average for the whole tour (e.g. more than 400 flats per manhour)? If no, please explain.

b. In your experience, are mail processing clerks, during a short "surge" period before a critical dispatch, capable of working at a faster pace than they would be able to sustain over a full eight hour tour?

c. Given that, according to the IOCS data presented by witness Degen, clerks at manual flats cases spend an average of 17.1 %, or an hour and 22 minutes out of an eight hour workday, on "breaks personal needs", would you agree that there must be periods during an average tour when the workload at flat cases is fairly light? If you do not agree, then please explain why mail processing supervisors allow so much time to be spent on "breaks personal needs".

**Response:**

a. Yes.

b. Yes.

c. I agree that volumes fluctuate within a given operation, and that it is not always easy to anticipate the timing and duration of those fluctuations. Therefore, there are periods of time when workload in a manual flats sorting operation will be "fairly light" by comparison to heavier volume periods during the same tour. Adjusting workhours to workload to precisely match those fluctuations is difficult. However, despite this

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difficulty, productivity in manual flat sorting has been fairly static over the last ten years.

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a. How do you explain the fact that, according to IOCS data, the percent of time that employees spend on "breaks personal needs" in mail processing facilities is much higher today than it was ten years ago?

b. According to the IOCS data presented by witness Degen, the percentage of employee time spent on "breaks personal needs", as well as the percent of time spent "clocking in or out", is higher at manual operations such as opening/pouching units and manual flats cases than at highly automated operations such as OCR and BCR. Is there anything in your experience that might explain this phenomenon? If yes, please explain.

**Response:**

a. Washup time and breaks are subject to local agreements. I have been told that in some facilities, all employees have, by local agreement, been granted two fifteen minute wash-up periods per day whether or not they directly perform "dirty work or work with toxic materials" as prescribed in the national agreement. As facility size has increased travel distance and thus time to and from bathroom facilities may have increased. USPS facilities became totally non-smoking in 1993. Prior to that, smoking was allowed in designated areas within the building. The complete ban on smoking may have contributed to employee requests for personal needs time and the length of time needed for those requests. The 1992 restructuring increased the number of employees supervised by individual supervisors thus increasing the span of control.

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b. Provisions for wash-up time are included in the national contracts. Both the Mailhandler and APWU contracts state that the installation head shall grant reasonable wash-up time to those employees who perform dirty work or work with toxic materials. Employees working in opening/pouching units are handling sacks, pouches and packages of mail. Employees working in manual operations are handling individual pieces of mail as part of the distribution function, and may also be handling sacks/pouches as part of that activity. Handling sacks/pouches, bundles and individual pieces of mail is, by the nature of the product handled, dirty work. Therefore, those functions are more likely to be granted wash-up time and more frequent wash-up periods. Similarly, depending upon facility layouts, opening/pouching units are more likely to be located near platform operations which can be further from lunch and/or break facilities thus incorporating more travel time in breaks/personal needs. Also, machine paced operations create a more controlled environment within which to manage employees.

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: 9/29/97



**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.



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Scott L. Reiter

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