

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
REDIRECTED FROM WITNESS MODEN
(DMA/USPS-T4-63-84, 85(B) & (D))

The United States Postal Service hereby provides responses to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T4-63-84, 85(b) & (d), filed on September 16, 1997, and redirected from witness Moden.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 30, 1997

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTEROGATORIES OF THE DMA
REDIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-63. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 7, Section 1.B.2 of the APWU Agreement, flexible part-time employees must be scheduled prior to scheduling casuals.

Response:

The contractual language provides the Postal Service with some flexibility / discretion in the scheduling when it says the Postal Service "will make every effort to insure that qualified and available" PTFs are used at the straight time rate prior to assigning such work to casuals. As such, this contractual language does not mandate that PTFs "must" be scheduled in all cases prior to scheduling casuals.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTEROGATORIES OF THE DMA
REDIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-64. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 7, Section 3 of the APWU Agreement, a flexible part-time employee will be converted to a full-time employee if one works on the same assignment for eight (8) hours within 10 hours on the same 5 days per week over a six (6) month time period.

Response:

This section dictates that if an assignment is worked in that configuration of days and hours, there is a need to convert that assignment to a full-time position. The filling of that newly created position is then accomplished using the appropriate craft article. The filling of the full-time position may or may not necessarily result in a part-time employee being converted.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTEROGATORIES OF THE DMA
REDIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-65. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that overtime for a flexible part-time employee is identified as more than eight (8) hours on a service day.

Response:

Confirmed, or over 40 hours in a week.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTEROGATORIES OF THE DMA
REDIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-66. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please explain in detail the parameters within which flexible part-time employees are scheduled for work.
- (b) Please explain how far in advance a flexible part-time employee is scheduled and the employees' capacity to refuse a work shift.
- (c) Please explain whether or not an employee is given a set number of hours to work or whether an employee is told in advance whether or not overtime will be expected.
- (d) Please explain how many shifts a flexible part-time employee could potentially have on a given service day.

Response:

- a. The parameters are spelled out in Article 8, sections 1 through 3.
- b. As far in advance as practicable based on the circumstances of the need, usually at least daily, sometimes longer. Management has the flexibility to change this daily. Refusals are handled on a case-by-case basis.
- c. Depends on the category of employee, full-time regular and part-time regular are given a set number of hours in their regular schedule, but may be required to work additional hours in accordance with the contract - all others are flexible. Overtime is communicated as soon as it is known there is the need.
- d. There is no established limit on the number of shifts.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-67. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please explain in detail the parameters within which casual employees are scheduled for work.
- (b) Please explain how far in advance a casual employee is scheduled and the employees capacity to refuse a work shift.
- (c) Please explain whether or not an employee is given a set number of hours to work, or whether an employee is told in advance whether or not overtime will be expected.
- (d) Please explain how many shifts a casual employee could potentially have on a given service day.

Response:

- a. They are scheduled within the parameters set up in Article 7, section 1.B.
- b. Usually weekly or daily, but could be changed at any time. Refusals are handled on a case by case basis.
- c. Casuals are not given a set number of hours and are told in advance as soon as practicable if there is a need to work them over 40 hours.
- d. As long as they are used within the context of the contractual provisions, there are no limits to number of shifts.

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TO THE INTEROGATORIES OF THE DMA
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DMA/USPS-T4-68. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that a casual employee is paid overtime when the employee works more than eight (8) hours on a service day or more than forty (40) hours in a service week. If not, please correct this statement.

Response:

They only get overtime for more than 40 workhours in a service week, not for more than 8 hours in a service day.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTEROGATORIES OF THE DMA
REDIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-69. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please explain in detail the parameters within which transitional employees are scheduled for work.
- (b) Please explain how far in advance a transitional employee is scheduled and the employees' capacity to refuse a work shift.
- (c) Please explain whether or not an employee is given a set number of hours to work or whether an employee is told in advance whether or not overtime will be expected.
- (d) Please explain how many shifts a transitional employee could potentially have on a given service day.

Response:

- a. TEs are scheduled to work within the parameters set up in Article 7.
- b. Usually weekly or daily, depending on which category they are covering or where they are working, but management has discretion to change. Refusals are handled on a case-by-case basis.
- c. TEs are not given a set number of hours and are told as far in advance as practicable when they will need to work more than 40 hours on overtime.
- d. As long as they are used within the contractual provisions, there are no limits on shifts for TEs.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-70. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please confirm that, in accord with Article 8, Section 4.G of the APWU Agreement, a transitional employee is paid overtime when the employee works more than forty (40) hours in a service week.
- (b) *What is the maximum number of consecutive hours a transitional employee can be scheduled to work?*

Response:

a. Confirmed.

b. Provided they are used within the contractual provisions and limits of Postal Service policies, a maximum is not set.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-71. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please confirm that, in accord with Article 8, Section 2.C of the APWU Agreement, the work week of a full-time regular employee does not necessarily consist of five (5) consecutive service days.
- (b) Please confirm that the work week can be made up of any 5 service days within the calendar week, which extends from 12:01 a.m. Saturday through 12 midnight Friday.

Response:

- a. Confirmed.
- b. The work week could be made up of any five service days, but may not extend from 12:01 a.m. Saturday, e.g., the employee who starts at 11 p.m. on Friday night.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-72. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please confirm that, in accord with Article 8, Section 1 and 2 of the APWU Agreement, full-time employee is guaranteed 40 hours of work [or pay] per week over the course of five (5) service days.
- (b) Please confirm that each service day for a full-time employee consists of eight (8) hours within ten (10) consecutive hours, except in a facility with more than 100 full-time employees, where each service day consists of eight (8) hours within nine (9) consecutive hours.

Response:

- a. Confirmed for full-time regular employees.
- b. Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-73. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Does a full-time regular employee have a predetermined work schedule that is consistent from week to week ?
- (b) If your response to subpart (a) is "no":
 - (i) How much input does the employee have as to his schedule?
 - (ii) How far in advance is the employee's schedule determined?
 - (iii) If the employee is not able to work a scheduled shift, what action is taken?
 - (iv) Is the employee able to exchange shifts with another employee?
 - (v) If your response to subpart (b)(iv) is "yes," must management approve such a change?

Response:

- a. Yes, with certain exceptions. It can be changed by management as long as the procedures agreed to in the contract are followed.
- b. n/a

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DMA/USPS-T4-74. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.D of the APWU agreement, a full-time regular employee can be required to work overtime by management.

Response:

Provided the conditions in Article 8, Section 5.D exist, confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-75. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.E of the APWU agreement, management has full, unrestricted latitude to approve a full-time regular employee's request to be excused from required overtime.

Response:

As stated in Article 8, Section 5.E, exceptions may be approved by local management in *exceptional cases based on equity, not based on unrestricted latitude.*

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-76. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.F of the APWU agreement, a full-time regular employee cannot be required to work overtime for more than four (4) of five (5) scheduled days in a service week.

Response:

Confirmed for employees not on the Overtime Desired List (ODL). ODL employees can be required to work up to 12 hours each day or 60 each week and generally must be required to do so before forcing non-ODL employees to work (if available and operational window permits).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-77. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.F of the APWU agreement, a full-time regular employee who did not sign the "Overtime Desired" list cannot be required to work more than ten (10) hours on a regularly scheduled day, eight (8) hours on a non-scheduled day, or more than six (6) days in a service week.

Response:

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-78. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.G of the APWU agreement, a full-time regular employee who did sign the "Overtime Desired" list can be required to work as much as, but no more than, twelve (12) hours per day and sixty (60) hours in a service week.

Response:

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-79. Please refer to your response to DMA/USPS-T4-24(a).

- (a) How far in advance is overtime scheduled?
- (b) How much notice is an employee given that overtime is desired?
- (c) How much notice is an employee given that overtime is required?

Response:

- a. As far in advance as management knows of the need.
- b. As far in advance as management knows of the need.
- c. As far in advance as management can when it knows of the need.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-80. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, if a full-time regular employee is called in outside of and not consecutive to a regular shift, the employee is guaranteed 4 hours of work or pay, and if the employee is called in a non-scheduled service day, the employee is guaranteed 8 hours of work or pay.

Response:

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-81. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, a part-time regular employee, part-time flexible employee, casual employee, and transitional employee are each guaranteed 4 hours of work or pay if called in outside of and not consecutive to a regular shift.

Response:

Not confirmed for PTFs, casuals or TEs. Under the provisions of the collective bargaining agreement, these categories do not have regular shifts. For employees with regular shifts, confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-82. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, a part-time regular employee, part-time flexible employee, and casual employee are each guaranteed four (4) hours of work or pay when scheduled or requested to work in a facility with over 200 man years of employment per year. In other facilities, each such employee is guaranteed two (2) hours of work or pay.

Response:

Not confirmed, as there are no guarantees for casuals. TEs are only guaranteed what is allowed under Article 8.8.D.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-83. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, a transitional employee is guaranteed two (2) hours of work or pay for scheduled shifts, as long as they were not directed not to report prior to the scheduled shift.

Response:

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-84. Please refer to your response to interrogatory ABP/USPS-T4-11, in which you state that an informal survey was conducted to determine how many more barcoded pieces there would be in the test year if bar-code readers were affixed to FSM 1000 equipment.

- (a) When was this survey conducted?
- (b) If a survey instrument was used, please provide it.
- (c) Please describe the participants in this survey.
- (d) Please provide a detailed account of the findings of this survey. How many non-automated, non-machinable pieces does the survey suggest would become barcoded in the test year?

Response:

- a. The survey was conducted during the early part of 1997.
- b. Not applicable. See response to DMA/USPS-1(a).
- c. See response to DMA/USPS-1(a).
- d. See attachment to DMA/USPS-1(a).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DMA/USPS-T4-85. Please refer to your direct testimony at page 9, lines 22-26, and to your response to interrogatory NAA/USPS-T4-7.

- (a) What percentage of total routes are in zones possessing 10 or more city routes and/or rural routes with city style addressing?
- (b) What percentage of the total volume of letters do the routes in subpart (a) receive?
- (c) What percentage of total routes are in zones with five to nine routes?
- (d) What percentage of the total volume of letters do the routes in subpart (c) receive?
- (e) What percentage of total routes are represented by the 1,183 zones with fewer than 10 routes that receive DPS as a result of local decisions?
- (f) What percentage of the total volume of letters do the routes in subpart (e) receive?

Response:

- a. Response provided by witness Moden.
- b. The percentage is 69.6. This is calculated by using the data from LR-H-128, page 20, used in developing the coverage factors for the letter models used by witnesses Daniel and Hatfield, USPS-T-29 and USPS-T-25 respectively. A ratio of LC13/LC7 for all classes shown on page 20 is used. The numerator, LC13, is the total volume of letters destinating at the 5-digit zones at plants with MPBCS or DBCS which have 10 or more city or rural routes. Rural routes are not distinguish regarding the type of addressing. In addition, this could include mail going to Post office boxes and firm directs at these zones. The denominator, LC7, is total destinating letter volumes, including mail going to 5-digit zones with only post office boxes or firm directs. Both LC7 or LC13 are defined at pages 5-6 of LR-H-128.

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- c. Response provided by witness Moden.
- d. This percentage is 7.7 percent. This is also calculated from the data of LR-H-128, page 20. The ratio of LC12/LC7 is used. LC12 is the total volume of letters destinating at the 5-digit zones at plants with MPBCS or DBCS which have 5 to 9 city or rural routes. Rural routes are not distinguish regarding the type of addressing. In addition, this could include mail going to Post office boxes and firm directs at these zones. LC7 is discussed above in subpart b. Both LC7 or LC12 are defined at pages 5-6 of LR-H-128.
- e. Response provided by witness Moden.
- f. Response provided by witness Moden.

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 cursive script, appearing to read "Scott Reiter", is written above a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
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September 30, 1997