

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

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COMPLAINT OF TIME WARNER INC. ET AL.  
CONCERNING PERIODICALS RATES

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Docket No. C2004-1

RESPONSE OF TIME WARNER INC. ET AL.  
WITNESS HALSTEIN STRALBERG TO USPS/TW ET AL.-T2-27  
(July 14, 2004)

Time Warner Inc., Condé Nast Publications, a Division of Advance Magazine Publishers Inc., Newsweek, Inc., The Reader's Digest Association, Inc., and TV Guide Magazine Group, Inc. (collectively, Time Warner Inc. et al.) hereby provide the responses of witness Stralberg (TW et al.-T-2) to United States Postal Service interrogatory USPS/TW et al.-T2-27, filed June 6, 2004.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

s/ \_\_\_\_\_  
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**RESPONSE OF WITNESS HALSTEIN STRALBERG TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE**

USPS/TW et al.-T2-27. In your response to USPS/TW et al.-T2-7(a) you state, "Some years ago when I was able to compare productivity rates in many different facilities, it appeared that the small facilities were achieving higher productivity rates, especially in manual operations. I used to conclude that this discrepancy had more to do with stability and morale of the workforce in more rural locations than with volume and such."

(a) Please confirm that when a clerk performs a manual sortation at a small facility, such as a delivery unit, he or she must be trained on the "scheme" for the ZIP Code(s) within that delivery unit. In other words, the clerk must be able to look at the address for a given mail piece and know which carrier is responsible for delivering that mail piece. If not confirmed, please explain.

(b) Please confirm that as the Postal Service has automated letter and flat operations over the last decade the number of employees with scheme skills in larger plants has decreased, as operations that formerly required scheme knowledge (e.g., LSMs, FSM881s, etc.) were no longer required. If not confirmed, please explain.

USPS/TW et al.-T2-27. Please note that in the part that you quote from my response to USPS/TW et al.-T2-7(a), I was referring also to large versus small SCF's and to sorting operations other than incoming secondary, e.g., incoming or outgoing primary.

a. Confirmed that when incoming secondary sorting is performed manually, it requires scheme knowledge. This is of course also true when incoming secondary sorting is performed manually in a large facility.

b. I do not possess any statistic showing the number of employees with scheme knowledge in different periods. However, it is my impression that the number of such employees has decreased substantially.