

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF POSTAL SERVICE WITNESS MARC D. McCRERY
TO INTERROGATORIES OF TIME WARNER INC.
REDIRECTED FROM WITNESS ELIANE VAN-TY-SMITH
(TW/USPS-T11-5a, 5c, 5h-k, 6d-h, 7a, 7e, 7g-j, 8d, 8f-j, 9b-e)
(May 6, 2005)

The United States Postal Service hereby responds to the above-listed interrogatories of Time Warner, Inc., filed on April 21, 2005. The interrogatories were redirected from witness Eliane Van-Ty-Smith.

The interrogatories are stated verbatim and are followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

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TW/USPS-T11-5 You describe a new cost pool that you call 1DSPATCH. At page 7 in your testimony you refer to it as “the dispatch unit.”

- a. What is “the dispatch unit” in a postal facility?
- b. Please confirm that “the dispatch unit” is defined by MODS numbers 124-129. If not confirmed, please give the correct numbers.
- c. Is “the dispatch unit” typically located on the platform? Or is it located on the workroom floor?
- d. In what fiscal year was the 1DSPATCH pool first used to produce the CRA reports?
- e. Before you introduced 1DSPATCH as a separate pool, which pool or pools would work under MODS numbers 124-129 have been assigned to?
- f. What is the normal craft and pay level for employees in this pool?
- g. Please describe the changes in USPS mail processing operations that caused you or the Postal Service to conclude that the new cost pool needed to be included in the MODS/IOCS costing scheme.
- h. Please describe all normal duties for employees in this cost pool and any unique skills required.
- i. Is it fair to say that the workload in this cost pool varies greatly, with periods of intense activity followed or preceded by periods of little or no activity?
- j. If they temporarily run out of things to do in their own cost pool, which other pools are employees in this pool likely to be assigned to?
- k. Has the Postal Service undertaken any study to assure that use of MODS numbers 124-129 is uniform and consistent in all processing plants that use those numbers? If yes, what was the result of such a study?

RESPONSE:

- a. Operations 124-127 include the work hours used to separate trays, sacks, bundles, or parcels into containers in preparation for dispatching. They also include hours used for the collection and set-up of mail transport equipment for the unit, movement of working containers into the unit, the strapping and sleeving

of trays with or without automatic strapping and sleeving equipment, and the staging of worked containers. If the facility uses a Tray Management System (TMS), the workhours for removing trays from the TMS and separating them into containers for dispatch are charged to Dispatch. Operations 128-129 are specifically for work hours used at Area Distribution Centers (ADC) for the primary/3-digit separation of mail to the facilities in the ADC service area.

- b. Retained by witness Van-Ty-Smith
- c. Yes to both questions. Dispatch operations are located around the floor and into the platform area depending on equipment used and available space.
- d-e. Retained by witness Van-Ty-Smith
- f. Employees in this cost pool are Mail Handlers, Level 4; Mail Handler Equipment Operators, Level 5; Mail Processing Clerks, Level 5; and General Expeditors, Level 6.
- g. Retained by witness Van-Ty-Smith
- h. See response to 5a. Standard Position Descriptions for the employees listed in 5f are attached.
- i. Yes.
- j. Other cost pools in LDC 13 or LDC 17.
- k. Not to my knowledge. The actual application of MODS numbers in this workcenter is inherently variable among plants due to the differences in equipment among plants.

MAIL HANDLER MH-04

FUNCTIONAL PURPOSE

Lloads, unloads, and moves bulk mail and performs other duties incidental to the movement and processing of mail.

DUTIES AND RESPONSIBILITIES

1. Unloads mail from trucks. Separates all mail received from trucks and conveyors for dispatch to other conveying units and separates and delivers mail for delivery to distribution areas.
2. Places empty sacks or pouches on racks, labels them where prearranged or where racks are plainly marked, dumps mail from sacks, cuts ties, faces letter mail, carries mail to distributors for processing, places processed mail into sacks, removes filled sacks and pouches from racks and closes and locks sacks and pouches. Picks up sacks, pouches, and outside pieces, separates outgoing bulk mails for dispatch and loads mail onto trucks.
3. Handles and sacks empty equipment; inspects empty equipment for mail and restrings sacks.
4. Cancels stamps on parcel post, operates cancelling machines, carries mail from cancelling machine to distribution cases.
5. Assists in supply and slip rooms and operates copy machine and related office equipment.
6. In addition, may perform any of the following duties: make occasional simple distribution of parcel post mail that requires no scheme knowledge; operate electric fork lifts; rewrap damaged parcels; weigh incoming sacks; clean and sweep work areas, offices, rest rooms, and trucks where work is not performed by a regular cleaner.
7. With approval of the Chief Postal Inspector, acts as an armed guard for valuable registry shipments and as a watchman and guard around post office building.

SUPERVISION

Supervisor, Distribution Operations, or other designated supervisor.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

MAIL HANDLER

KEY POSITION REFERENCE

KP-0008

(End of Document)

GENERAL EXPEDITOR PS-06

FUNCTIONAL PURPOSE

Arranges for the proper transfer for mail which may require the knowledge of incoming and/or outgoing schemes, transportation schedules, and receipt and dispatch information in performing mail distribution between highway contract routes, mail messengers and truck routes, and other mail units; and the separating, loading, and unloading of railway storage cars, flexi-vans and piggy-back trailers, by contractors and postal employees to ensure proper and expeditious handling.

DUTIES AND RESPONSIBILITIES

1. Expedites the distribution and dispatch of all mails processed in the assigned work areas.
2. Coordinates the dispatch of mail from cases, registry section, and/or other areas by giving timely notice of regular and emergency dispatches to ensure expeditious handling of mail. Coordinates the movement of mails from the platform (or related receipt point) to processing areas or from cases to pouches, and pouches to dispatch points or platform.
3. Recommends changes in pouch and sack racks, pouch authorization, and work assignments as changes in distribution and dispatch schedules dictate.
4. Assists supervisor in carrying out special assignments, such as, mail volume counts, information for surveys, observing handling of selected mail matter, and other similar duties. May maintain records of mail volumes, work hours, and other record keeping; assists with on-the-job training.
5. Ensures proper labeling, timely closing, routing and dispatch of all pouches and sacks within the assigned work area; arranges for equipment.
6. Keeps informed on contract provisions for routes serving the facility such as, loading agreements, correct sized vehicles, proper protection of the mail and other special conditions. Periodically inspects contract vehicles and reports deficiencies or irregularities to supervisor.
7. Keeps informed of all scheduled arrivals and departures at the duty station, and has knowledge of the most expeditious dispatches to ensure an alternative rerouting of preferential mails due to unusual circumstances; determines whether mail should be held for alternate connections.
8. Examines outgoing and incoming vehicles to determine degree of utilization and adherence to highway safety regulations and reports irregularities to supervisor.
9. Recommends arrangements for extra trips of service when necessitated by volume or unusual circumstances.
10. Oversees the loading and unloading of storage cars, flexi-vans, piggy-back trailers, or other mail containers intended for transportation by rail when such activities are performed at the facility.

(Continued on next page)

GENERAL EXPEDITOR PS-06

11. Maintains close contact with supervisor in the distribution and vehicle service units to assure close coordination of all mail handling operations.
12. Performs manual distribution of all classes of mail.
13. Performs other job related tasks in support of primary duties.

SUPERVISION

Manager, Airport Mail Center/Facility or other designated supervisor.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

CLERK

KEY POSITION REFERENCE

KP-0015

(End of Document)

MAIL HANDLER EQUIPMENT OPERATOR MH-05

FUNCTIONAL PURPOSE

Operates a jitney, fork-lift or pallet truck for the movement of mail, and performs other mail handler functions as required.

DUTIES AND RESPONSIBILITIES

1. Operates a jitney, fork-lift or pallet truck, as a qualified licensed driver in the performance of transporting mail within a postal facility.
2. Moves empty equipment utilized in transporting mail to storage or staging area.
3. Performs routine safety inspection of vehicular equipment utilized; reports deficiencies.
4. Observes established safety practices and requirements.
5. Performs other mail handler duties when not occupied as a licensed driver.

SUPERVISION

Supervisor, Distribution Operations, or other designated supervisor.

SELECTION METHOD

Senior Qualified

BARGAINING UNIT

MAIL HANDLER

KEY POSITION REFERENCE

KP-0010

(End of Document)

MAIL PROCESSING CLERK PS-05

FUNCTIONAL PURPOSE

Performs a variety of clerk duties required to process mail using automated mail processing equipment or manual methods of sortation and distribution.

DUTIES AND RESPONSIBILITIES

1. Makes one or more sortations of outgoing and/or incoming mail using the appropriate sort program or manual distribution scheme.
2. On a rotation basis, performs all of the following duties: loads mail onto automated equipment, culling out non-processable items; enters sort plan and starts equipment; monitors flow of mail to ensure continuous feed; sweeps separated mail from bins/ stackers; and stops equipment when distribution run or operation is completed. Runs machine reports, clears jams and contacts maintenance for assistance when required.
3. Prepares work area, ensuring all necessary support equipment and materials, including labels, trays, and other containers, are in place.
4. Removes sorted mail from bins or separations and places into appropriate trays or containers for further processing or dispatch based on knowledge of operating plans and dispatch schedules, or at the instruction of supervisors or expeditors; may riffle or verify mail to ensure sortation accuracy as needed.
5. In addition, may perform any of the following duties: provide service at public window for non-financial transactions; maintain records of mails; examine balances in advance deposit accounts; and record and bill mail requiring special service.
6. Uses established safe work methods, procedures and safety precautions.
7. Performs other job related tasks in support of primary duties.

SUPERVISION

Supervisor, Distribution Operations; Supervisor, Customer Services, or other designated supervisor

SELECTION METHOD**BARGAINING UNIT**

CLERK

(End of Document)

TW/USPS-T11-6 You describe a new cost pool that you call 1FLATPRP.

- a. Please confirm that this pool is defined by MODS number 035. If not confirmed, please give the correct number(s).
- b. In what fiscal year was the 1FLATPRP pool first used to produce the CRA reports?
- c. Before you introduced 1FLATPRP as a separate pool, which pool would work under MODS number 035 have been assigned to?
- d. What is the normal craft and pay level for employees in this pool?
- e. Please describe all normal duties for employees in this cost pool and any unique skills required.
- f. Please confirm that the purpose of this cost pool is to prepare flats that arrive in non-carrier route bundles for piece sorting on the AFSM-100 or other flats sorting machines. If not confirmed, or if there are additional duties, please explain.
- g. If they temporarily run out of things to do in their own cost pool, which other pools are employees in this pool likely to be assigned to?
- h. Has the Postal Service undertaken any study to assure that use of MODS number 035 is uniform and consistent in all processing plants that use this number? If yes, what was the result of such a study?

RESPONSE:

- a-c. Retained by witness Van-Ty-Smith
- d. Mail Handler, Level 4
- e. Work hours charged to Operation 035 are specifically for the following tasks:
 1. Removal of strapping or banding from flat bundles that are processed on flat sorting machines or in manual flat cases.

2. Separating, facing and loading flats into mail transport equipment that will be sent to flat sorting machines or manual flat cases.
 3. Securing flats into an AFSM 100 Flat Mail Cart that will be sent to an AFSM 100.
- f. See response to 6e.
 - g. Other LDC-17 cost pools.
 - h. Not to my knowledge.

TW/USPS-T11-7 You describe a new cost pool that you call 1OPTRANS. At page 7 in your testimony you refer to it as “the opening unit’s manual transport.”

- a. What is “the opening unit’s manual transport” in a postal facility?
- b. Please confirm that 1OPTRANS is defined by MODS number 114. If not confirmed, please give the correct number(s).
- c. In what fiscal year was the 1OPTRANS pool first used to produce the CRA reports?
- d. Before you introduced 1OPTRANS as a separate pool, which cost pool would work under MODS number 114 have been assigned to?
- e. What is the normal craft and pay level for employees in this pool?
- f. Please describe the changes in USPS mail processing operations that caused you or the Postal Service to conclude that 1OPTRANS needed to be included as a separate pool in the MODS/IOCS costing scheme.
- g. Please describe all normal duties for employees in this cost pool and describe any unique skills required.
- h. If they temporarily run out of things to do in their own cost pool, which other pools are employees in this pool likely to be assigned to?
- i. Has the Postal Service undertaken any study to assure that use of MODS number 114 is uniform and consistent in all processing plants? If yes, what was the result of such a study? Specifically, did the Postal Service verify that MODS number 114 is used by, and only used by, employees that operate “the opening unit’s manual transport?”
- j. Is MODS number 114 sometimes used to represent an SCF opening unit?

RESPONSE:

- a. Operation 114 is specifically for work hours used to transport containers of mail between work areas. It also includes work hours used to weigh mail into or from distribution operations.

- b-d. Retained by witness Van-Ty-Smith
- e. Mail Handler, Level 4 and Mail Processing Clerks, Level 5
- f. Retained by witness Van-Ty-Smith
- g. See response to 7a and Standard Position Description attached to 5h.
- h. Other LDC 17 and LDC 13 cost pools.
- i. Not to my knowledge.
- j. No, but see response to 7c and 7d.

TW/USPS-T11-8 You describe a new cost pool called 1TRAYSRT. At page 6 in your testimony you refer to it as “the tray sorters and robotics cost pool.”

- a. Please confirm that 1TRAYSRT is defined by MODS numbers 618, 619 and 627-629. If not confirmed, please give the correct numbers.
- b. In what fiscal year was the 1TRAYSRT pool first used to produce the CRA reports?
- c. Before you introduced 1TRAYSRT as a separate pool, which cost pool(s) would work under MODS numbers 618, 619 and 627-629 have been assigned to?
- d. What is the normal craft and pay level for employees in this pool?
- e. Please describe the changes in USPS mail processing operations that caused you or the Postal Service to conclude that 1TRAYSRT needed to be included as a separate pool in the MODS/IOCS costing scheme.
- f. Please describe all normal duties for employees in this cost pool and describe any unique skills required.
- g. If they temporarily run out of things to do in their own cost pool, which other pools are employees in this pool likely to be assigned to?
- h. Has the Postal Service undertaken any study to assure that use of MODS numbers 618, 619 and 627-629 is uniform and consistent in all processing plants? If yes, what was the result of such a study? Specifically, did the Postal Service verify that these MODS numbers are used by, and only used by, employees that operate “tray sorters and robotics?”
- i. Please confirm that the cost pool handles trays of letters and flats that have been sorted at a piece distribution operation in the given plant. If not confirmed, please explain.
- j. Does the pool also handle trays of letters and flats that have arrived from another postal facility? If yes, please describe the circumstances under which this occurs.

RESPONSE:

a.-c. Retained by witness Van-Ty-Smith

- d. Mail Handler, Level 4 and Mail Processing Clerk, level 5.
- e. Retained by witness Van-Ty-Smith
- f. See responses to 8e and the Standard Position Descriptions attached to 5h.
- g. Other LDC-13 and LDC-17 operations.
- h. Not to my knowledge.
- i. Confirmed.
- j. Yes. This cost pool may sort trays sent from other facilities for dock transfer or distribution.

TW/USPS-T11-9 Is the pool called “1PRESORT” any different from the “Bulk Presort” pool used in previous rate filings? If yes, please explain. In any event, please answer the following.

- a. Please confirm that 1PRESORT is defined by MODS numbers 002 and 003. If not confirmed, please give the correct numbers.
- b. What is the normal craft and pay level for employees in this pool?
- c. Please describe all normal duties for employees in this cost pool and identify any unique skill levels required.
- d. If they temporarily run out of things to do in their own cost pool, which other pools are employees in this pool likely to be assigned to?
- e. Has the Postal Service undertaken any study to assure that use of MODS numbers 002 and 003 is uniform and consistent in all processing plants? If yes, what was the result of such a study?

RESPONSE:

- a. Retained by witness Van-Ty-Smith
- b. Mail Handlers, Level 4 and Mail Processing Clerks, Level 5
- c. Operations 002-003 are specifically for activities related to handling presort mail.
The activities include traying, sleeving, strapping, and separation for the next handling operation, which is generally scan-where-you-band, Automated Airline Assignment, distribution, or dispatch.
- d. Other LDC 13 and LDC 17 operations.
- e. Not to my knowledge.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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