

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005 : Docket No. R2005-1
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FIRST SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
(TW/USPS-T29-1-3)
(May 9, 2005)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatories to United States Postal Service witness McCrery (USPS-T-29).

If witness McCrery is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or by another person capable of providing an answer.

Respectfully submitted,

s/ _____
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**FIRST SET OF INTERROGATORIES TO WITNESS McCRERY
(USPS-T-29)**

TW/USPS-T29-1 You describe automatic induction (AI) systems that will be attached to 210 AFSM-100 machines in the test year.

- a. Will flats prepping continue to be done as it is today for the other 324 AFSM-100? If not, please explain what changes you foresee.
- b. Under what MODS number and what LDC (Labor Distribution Code) will employees at the AI systems be working?
- c. In the Postal Service's roll forward to test year costs in this docket, which mail processing cost pool contains the expected cost of the AI employees?
- d. Will AFSM-100 clerks sometimes operate the AI prepping stations? If yes, please describe the circumstances under which this may occur.
- e. Will employees operating the AI be considered part of the AFSM-100 crew?

TW/USPS-T29-2 Please assume that employees in an AI system start preparing flats and placing them in Automation Compatible Trays (ACT's) before the attached AFSM-100 machine has started processing flats.

- a. Please confirm that the filled trays will be stored on the system of conveyor belts linking the AI to the AFSM-100, until the AFSM-100 starts processing.
- b. Approximately how many ACT's, with flats ready to be inducted, can an AI system accommodate?
- c. Does an ACT have roughly the same capacity as a current flats tub? If no, please describe the capacity of an ACT and indicate how many flats it will hold.
- d. Would an AI system as presently envisioned sometimes be used to feed flats to more than one AFSM-100? If yes, please describe the circumstances under which this may occur.

TW/USPS-T29-3 Regarding MODS operation 035, which witness Van-Ty-Smith identifies as the flats preparation cost pool, or 1FLATPRP:

- a. Please confirm that flats in carrier route bundles are not processed in

the 035 operation. If not confirmed, please explain.

b. Assume that flats are in 5-digit bundles to a zone for which there is no automated sortation scheme, i.e., the sortation to carrier route will be done manually. Will such bundles normally be processed in the 035 operation? Please explain the circumstances under which this occurs and does not occur.

c. Does the preparation of flats for piece sorting in today's environment also occur in operations that do not have MODS number 035? If yes, identify the types of operations where this might occur and the MODS numbers for any such operations.