

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005 : Docket No. R2005-1
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SECOND SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
(TW/USPS-T29-4-10)
(May 19, 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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SECOND SET OF INTERROGATORIES TO WITNESS McCRERY (USPS-T-29)

TW/USPS-T29-4 In your response to parts of TW/USPS-T11-5, redirected from witness Van-Ty-Smith, you describe the functions performed under the 1DSPATCH cost pool. In her response to part e of the same interrogatory, Van-Ty-Smith indicates that before FY02, MODS numbers 124-129, which define the 1DSPATCH pool, were part of the 1POUCHNG cost pool. The following questions concern the mail processing operations that have remained in the 1POUCHNG pool.

- a. Please confirm that 1POUCHNG consists of work performed under MODS numbers 120 and 121 for outgoing, 122 and 123 for incoming and 345 for international pouching.
- b. Please confirm that the present (remaining) part of 1POUCHNG consists of what its name indicates, namely placing mail in sacks, along with related work such as hanging, tying out and labeling sacks. If not fully confirmed, please describe the other activities, not related to placing mail in sacks, that are performed at 1POUCHNG. For any such activity, please state the degree to which it applies to flats.
- c. Roughly what portion of the work performed in 1POUCHNG consists of placing mail in sacks and related activities?
- d. Please describe the craft and pay levels for employees that typically work in this cost pool.

TW/USPS-T29-5 Please describe the conditions under which flats or flats bundles originating and destinating in the United States are placed in sacks by Postal Service employees in today's mail processing environment. Include a description of the types of sorting schemes (outgoing, MMP, incoming primary, incoming secondary, etc.) for which this is most likely to occur. Specifically:

- a. Is it generally true that pouching of flat mail in a given facility comes after a piece distribution? If it is not always true, please describe the circumstances where pouching of flat mail occurs before any piece distribution in the given facility.
- b. Please confirm that flats which have been sorted into flats tubs at an AFSM-100 or FSM-1000 machine will not be taken to a pouching operation. If not confirmed, please describe the circumstances under which they will be taken to a pouching operation.

c. Are flats which have been sorted at a manual flats case sometimes taken to a pouching operation? If yes, describe the circumstances under which this occurs.

d. Are flats bundles which have been sorted at an opening unit sometimes taken to a pouching operation? If yes, describe the circumstances under which this occurs.

TW/USPS-T29-6 Please confirm that the following is true for flats or flats bundles that are placed into sacks at a pouching operation, or explain any disagreement.

a. The sacks into which flats or flats bundles have been placed will be dispatched to another postal facility.

b. In addition to the costs incurred at the pouching operation itself, the flats or flats bundles will incur additional costs at a downstream facility in order to get them out of the sacks again, including the types of sack related costs that are described in library reference USPS-LR-K-85, sponsored by witness Cutting.

c. Bundles that are transported in sacks run a high risk of breaking, whether the sacks have been made up by mailers or in postal facilities.

TW/USPS-T29-7 Please consider a hypothetical manual opening unit in a postal facility where bundles of flats are sorted from a belt into various containers, including hampers, APC's, U-carts and some sacks.

a. Do opening units of the kind described above exist in today's mail processing plants? Please explain any negative answer.

b. What MODS number would an opening unit of this kind use? If a range of (more than one) three-digit MODS numbers might be used, please describe the type of opening unit that would correspond to each number.

c. Which of the mail processing cost pools, as defined in USPS-T-11, would an opening unit of the type described use? If more than one answer is possible, please describe the opening unit characteristics that would determine which answer applies.

TW/USPS-T29-8 In response to TW/USPS-T11-7a, redirected from witness Van-Ty-Smith, you indicate that:

"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.”

Please explain when postal facilities weigh mail coming from a distribution operation in the same facility. Additionally, please indicate for each of the following activities in mail processing plants whether they would be represented by MODS number 114 either: (1) most of the time; (2) some of the time; or (3) never.

- a. Moving containers of “working” flats bundles from a bundle sorting operation to a flats preparation operation;
- b. Moving containers of flats bundles that will not require piece sorting in the given facility from a bundle sorting operation to dispatch;
- c. Moving “ergo carts” of “prepped” flats to an AFSM-100 from a flats preparation area;
- d. Moving “ergo carts” of “prepped” flats to a UFSM-1000 from a flats preparation area;
- e. Moving “ergo carts” of “prepped” flats to a manual flats case from a flats preparation area;
- f. Moving sorted flats to a pouching operation;
- g. Moving containers of bundles from a bundle sorting operation to a pouching operation;
- h. Moving containers of bundles from a bundle sorting operation to a secondary bundle distribution; or
- i. Moving containers of flats tubs from one flats sorting operation to another.

TW/USPS-T29-9 Please assume that a bundle sorting operation has produced a hamper of flats bundles that are to be subject to piece sorting in the given facility. Please indicate which of the following is true. If any statement below is true some time but not all the time, or if only part of the statement is true, then please explain further.

- a. The bundles will be weighed for determination of MODS first handling pieces (FHP) when they leave the bundle sorting operation but before undergoing flats preparation;
- b. The “prepped” flats will be weighed for determination of MODS first handling pieces (FHP) when they leave the flats preparation operation (035) but before undergoing piece sorting;
- c. The bundles, if they are going to a piece distribution which will be

performed manually, will be weighted after leaving the bundle sorting operation, then taken directly to the manual flats area, bypassing the 035 operation;

d. The bundles, if they are going to a piece distribution which will be performed manually, will still be taken to an 035 operation just as if the flats were to be machine sorted.

e. If the given piece distribution is to be performed at a station or branch and not in the plant, the bundles will bypass the 035 operation, as well as the weighing and will simply be dispatched to the given station/branch. The pieces therefore will not be reported as FHP.

TW/USPS-T29-10 Assume that an employee who works at an SPBS bundle sorting operation sees that one hamper, containing “working” bundles, is about to overflow. He removes it and replaces it with an empty hamper. Then he moves the full hamper to the flats preparation area in another part of the facility, after which he returns and continues to work at the SPBS. Is this employee, while moving the full hamper referred to above, supposed to clock himself into MODS operation 114, then clock into his normal operation when he returns? Please explain your answer.