

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 UNITED STATES POSTAL SERVICE WITNESS McCRERY  
TO INTERROGATORIES OF TIME WARNER INC.  
[TW/USPS-T29-1-3]  
(May 23, 2005)

The United States Postal Service hereby provides its responses to above-listed interrogatories of Time Warner Inc., filed on May 9, 2005. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Response of Postal Service Witness Marc McCrery  
To Interrogatories Posed by Time Warner Inc.

**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?

**RESPONSE:**

- a. Yes.
- b. Employees working at the AI systems will work under MODS number 035 and LDC 17.
- c. I am informed that costs are not rolled forward to cost pools. However, it should be noted that according to Appendix F of witness Waterbury's testimony (USPS-T-10), AI costs and savings are distributed using key 1442 which, according to the next Appendix (App. G), is the distribution key for the AFSM-100.
- d. It has yet to be determined which craft will be assigned this task.
- e. Yes.

Response of Postal Service Witness Marc McCrery  
To Interrogatories Posed by Time Warner Inc.

**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.

**RESPONSE:**

- a. Confirmed.
- b. The AI system can accommodate approximately 95 ACTs ready to be inducted.
- c. The ACT can hold slightly more pieces than a USPS flat tub – up to 130 pieces on average, compared to approximately 90 pieces per flat tub.
- d. No, the machines will not be configured in this manner.

Response of Postal Service Witness Marc McCrery  
To Interrogatories Posed by Time Warner Inc.

**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.

**RESPONSE:**

- a. Generally confirmed. However, flats in poorly prepared carrier route bundles that break open prior to reaching the delivery unit may be prepared in operation 035.
- b. Normally such bundles will be sent directly to the delivery unit. However, at some plants for some delivery units, such bundles may be retained and prepared for manual distribution at the plant.
- c. Yes. Flat pieces may be prepared on the sweep side of the SPBS (MODS 134-139) or immediately after processing on the flats canceller (MODS 016). Also, 5-digit bundles identified and isolated at delivery units may be prepared at the units and then directed back to the plant for processing.

## **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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