

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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| 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 MILLER  
(TW/USPS-T20-1-3)  
(June 1, 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 Miller (USPS-T-20).

If witness Miller 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 MILLER (USPS-T-20)**

TW/USPS-T20-1 Please provide a list of the MODS numbers used to describe BMC operations, along with a description of what each numbered operation consists of. Additionally, please indicate for which operations the BMC MODS measures volume. Also, for the portion of FY2005 for which records are available, please provide a table, in Excel format, of the total volumes (when applicable) and workhours recorded under each MODS operation in the BMC's.

TW/USPS-T20-2 In your response to POIR 4, question 5, you show sack sorter (SSM) productivity rates of 165 pcs/hr in Quarter 1 and 189 pcs/hr in Quarter 2 of FY2005.

- a. Please confirm that "pcs/hr" in this case refers to sacks per workhour.
- b. Please describe the activities, other than keying from sack labels, that these productivity rates include. In particular, state whether they include: (1) dumping sacks from containers; (2) any secondary sorting at roller table type operations; (3) removing full containers of sorted sacks and replacing them with empty containers; (4) repairing or removing sacks that are damaged or open; (5) clearing jams; or (6) any other sack sorter related activities.

TW/USPS-T20-3 The table of productivity rates in LR-K-46 includes references to the planning guidelines (PGL).

- a. How are the PGL used in today's mail processing operations?
- b. Please provide a list of all current PGL productivity rates.
- c. How often are the PGL updated and when was the last time?
- d. Please confirm that PGL productivity rates are based on MTM methodology. If not confirmed, please explain what they are based on.