

SECOND SET OF INTERROGATORIES TO WITNESS VAN-TY-SMITH (USPS-T-11)

TW/USPS-T11-10 Please refer to your answer to question 8 in POIR 4 and the Excel spreadsheet POIR4_item8_response.xls filed with that answer. The spreadsheet contains tables that break down the dollar weighted direct tallies, mixed tallies and unidentified container tallies at each allied operation.

- a. Please provide, in a similar Excel format, the dollar weighted not handling tallies, by IOCS activity code, at the same allied operations.
- b. Please provide a similar breakdown of the dollar weighted not handling tallies for the remaining (non-allied) cost pools.

TW/USPS-T11-11 Please refer to Table I-2B in Excel spreadsheet R2005 Ir-k-55_pt1.xls in LR-K-55. It includes BY04 workhours for various Function 1 MODS numbers. For all such MODS numbers where volumes are also recorded, please provide the corresponding measures of BY04 first handling pieces (FHP), total piece handlings (TPH) and total pieces fed (TPF). Please provide the information in an Excel spreadsheet.