

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-T29-4-10]  
(June 2, 2005)

The United States Postal Service hereby provides its responses to above-listed interrogatories of Time Warner Inc., filed on May 19, 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  
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**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.

**RESPONSE:**

- a. I am informed that your statement is correct.
- b. These operations are specifically for separation of all mail types into sacks or pouches and the dumping of sacks and containers onto a conveyor or fixed table to be worked. The working mail may also arrive in containers and be worked directly out of these containers into sacks or pouches. The work content also includes setting up the work area, moving containers of working mail into the unit, removing strapping and sleeves from trays, moving worked sacks/pouches from

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racks onto mail transport equipment, and the staging of worked containers.

- c. Almost all. On occasion, bundles may be worked into flat tubs.
- d. Mail Handler, Level 4 and Mail Processing Clerk, Level 5.

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**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.

**RESPONSE:**

- a. Though some pouching of flats or flat bundles does occur after piece distribution, I would not say that this is true most of the time. When flats are presorted into bundles by customers and placed into residual containers (e.g. Mixed-ADC sacks or tubs), the bundles will be directed to a bundle distribution operation, which could include pouching, without the pieces first receiving piece distribution. Furthermore, certain bundles prepared by customers in direct containers (e.g. ADC sacks or pallets of newspaper bundles) may be directed to a pouching operation where the contents will be emptied and the bundles distributed to

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downstream facilities prior to any piece distribution.

- b. Generally, this can be confirmed. The exception would be when tubs are generated off an AFSM 100 or UFSM 1000 for certain destinations containing very few pieces, and it is determined that it would be inefficient to transport the “skin” tubs from the origin to the destination. In these cases, a plant could choose to band and pouch these pieces.
- c. In limited situations this does occur. The circumstances would be very similar to what is described in part (b) above. If the finalized manual volume to a destination results in very few pieces in a tub, the plant could choose to band and pouch these pieces.
- d. There could be situations in which an opening unit is processing containers that contain bundles that are then directed to a pouching operation. However, in many cases, the opening and pouching functions are performed in a combined operation, or the bundles are directed to a pure pouching operation bypassing the opening unit.

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**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.

**RESPONSE:**

- a. This is generally true. One exception would be when mail is provided in sacks directly to firm or business customers.
- b. Except for the situation described in part (a) above, this is true.
- c. It is true that bundles in sacks have a higher likelihood of being broken or breaking when emptied from a sack compared to bundles emptied from a pallet. In large part, this is due to the fact that bundles placed in non-rigid sacks are subjected to more stress from the time they are placed in the sack until emptied compared to bundles on pallets. Whether a bundle has a high likelihood of breaking is also a matter of the methods used to and quality associated with securing the bundle.

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**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.

**RESPONSE:**

- a. Yes.
- b. Operations 110-111 and 115-116 are for separation of originating preferential and Standard Mail, respectively. Operations 180-181 and 185-186 are for separation of destinating preferential and Standard Mail, respectively. Similar work may also be preformed in outgoing pouching (120-121) or incoming pouching (123-124). The second number in each sequence has identical meaning to the first and is simply provided for management convenience (e.g. in large operations).
- c. MODS numbers in both the opening and pouching cost pools might be used depending on whether the work was predominantly opening or pouching.

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**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

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- i. Moving containers of flats tubs from one flats sorting operation to another.

**RESPONSE:**

Withdrawals are generally weighed. For example, if mail is discovered to be too thick for processing after it was already entered into an operation, the mail would be withdrawn and weighed before going to, for example, manual distribution..

a. – i. The answer in all cases is “some of the time”. As you noted in your question TW/USPS-T11-7, MODS 114 is for manual transport. A significant portion of transport is mechanized in many facilities. Even if I reword your questions to specify manual transport only, the proportion of transport workhours charged to MODS 114 varies substantially among plants, so my best estimate remains “some of the time”.

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**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.

**RESPONSE:**

- a. Not true. Flat bundles are not weighed for determination of MODS first handling pieces (FHP) after leaving the bundle sorting operation but before undergoing flats preparation in operation 035.
- b. True.

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- c. True some of the time. However, for operational convenience, flat bundles upon extraction from a bundle sorting operation are sometimes taken to operation 035 for flats preparation, then weighed and taken to a manual operation for piece distribution.
- d. True some of the time. See response to part (c).
- e. True.

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**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.

**RESPONSE:**

No, when employees clocked into a sorting operation such as the SPBS perform incidental work of short duration chargeable to a different MODS number, they nonetheless remain clocked into their normal operation.

## **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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