

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER INC.,
REDIRECTED FROM WITNESS MILLER (TW/USPS-T20-1, 3)
(June 15, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories TW/USPS-T20-1 and 3, submitted on June 1, 2005. These interrogatories were redirected from witness Miller (USPS-T-20). A partial objection was filed to interrogatory TW/USPS-T20-1 on June 13, 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 THE UNITED STATES POSTAL SERVICE
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REDIRECTED FROM WITNESS MILLER

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 FY 2005 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 BMCs.

RESPONSE:

Please refer to the following data, which is also in the attached Excel file.

MODS Operations at BMCs

MOD #	MODS DESCRIPTION	Volume in FY05?
031	DEBRIS/LOOSE MAIL	Yes
045	MANUAL LTR- OUTGOING BULK BUSINESS	Yes
054	I/C SECONDARY FLATS - PRIORITY	Yes
075	MANUAL FLT - OUTGOING BULK BUSINESS	No
100	MANUAL PARCELS-OUTGOING	Yes
101	MECHANIZED PARCEL SORTING (Secondary)	Yes
105	MECHANIZED PARCEL SORTING (PRIMARY)	Yes
109	DAMAGED PARCEL REWRAP	No
111	OPENING UNIT - OUTGOING PREF	Yes
115	OPENING UNIT - BULK BUSINESS	Yes
116	OPENING UNIT - OUTGOING STANDARD	Yes
117	MANUAL TRAY SEPARATION - STANDARD	Yes
120	POUCHING OUTGOING	Yes
135	SPBS OUTGOING STD	Yes
136	SPBS INCOMING PREF (2C)	No
137	SPBS INCOMING STD	Yes
141	MPFSM-OUTGOING	No
143	MPFSM-INCOMING	No
144	MPFSM-SCF	No
200	MANUAL PARCELS-INCOMING	Yes
210	PLATFORM - INBOUND	Yes
212	PLATFORM - OUTBOUND	Yes
213	PLATFORM - OUTBOUND	No
215	MECH UNLOAD	No
229	EQUIPMENT OPERATOR - TOW	Yes
230	EQUIPMENT OPERATOR - FORKLIFT	Yes
231	EXPEDITER	No
238	MECHANIZED SORT-SACKS/OUTSIDE MACH	Yes
239	MECHANIZED SORT-SACKS/OUTSIDE MACH	Yes
256	LINEAR INTEGRATED PARCEL SYSTEM - PREF	No
257	LINEAR INTEGRATED PARCEL SYSTEM - BBM	Yes
291	DIOSS EC-OCR O/G DISTRIBUTION	No

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292	DIOSS EC-OCR I/C DISTRIBUTION	No
293	DIOSS EC-ISS O/G DISTRIBUTION	No
294	DIOSS EC-ISS I/C DISTRIBUTION	No
295	DIOSS EC-OSS O/G DISTRIBUTION	No
296	DIOSS EC-OSS I/C DISTRIBUTION	No
297	DBCS/DIOSS EC-BCS O/G DISTRIBUTION	No
298	DBCS/DIOSS EC-BCS I/C DISTRIBUTION	No
299	DBCS – ISS/OSS MODE – RESERVED	No
325	I/C PRIMARY PARCELS - OUTSIDES	Yes
340	STANDBY - MAIL PROCESSING	No
341	QWL COORDINATOR-NONSV EMPLOYEES	No
441	FSM 1000, OUTGOING PRIMARY	No
442	FSM 1000, OUTGOING SECONDARY	No
443	FSM 1000, MMP	No
444	FSM 1000, SCF	No
445	FSM 1000, INCOMING PRIMARY	No
446	FSM 1000, INCOMING SECONDARY	No
447	FSM 1000, BOX SECTION	No
448	FSM 1000, INCOMING NON-SCHEME	No
451	AREA/DISTRICT PROJECTS - NON-SUPERVISION	No
457	AREA/DISTRICT PROJECTS - SUPERVISION	No
541	MISC HUMAN RESOURCE ACTIVITIES	No
549	EMPTY EQUIPMENT PROCESSING	No
554	OFFICE WORK & RECORDKEEPING-MAIL PROCESSING	No
557	OFFICE WORK & RECORDKEEPING-HUMAN RESOURCES	No
560	MISC ACTIVITY-MAIL PROCESSING	No
561	MISC ACTIVITY-MAIL PROCESSING	No
562	MISC ACTIVITY-MAIL PROCESSING	No
563	MISC ACTIVITY-MAIL PROCESSING	No
564	MISC ACTIVITY-MAIL PROCESSING	No
566	TRAINING SUPPORT	No
581	INDUSTRIAL ENGINEER	No
582	QUALITY IMPROVEMENT	No
591	ODIS - FINANCE & PLAN EMPLOYEE	No
607	STEWARDS - CLERKS - MAIL PROCESSING	No
612	STEWARDS-MAIL HANDLER-MAIL PROCESSING	No
616	STEWARDS - MTE	No
617	UNION BUSINESS, VO	No
618	MECHANIZED TRAY SORTER O/G	Yes
619	MECHANIZED TRAY SORTER I/C	Yes
620	TRAVEL BETWEEN FACILITIES	No
625	NMO DIST MECHANIZED	Yes
627	ROBOTICS - PEDESTAL	Yes
628	ROBOTICS - GANTRY OUTGOING	Yes
633	OTHER TIMEKEEPING	No
643	INJURY COMPENSATION	No
647	VOMA SUPPORT	No
648	INFORMATION SYSTEMS	No
651	ADMIN & CLERICAL - FINANCE	No

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652	LABOR RELATIONS	No
653	SAFETY & HEALTH	No
655	SUPERVISOR, BUSINESS MAIL ENTRY	No
656	COMMERCIAL SALES & ACCOUNT MGMT	No
658	EXPEDITED MAIL SERVICE	No
660	MAILING REQUIREMENTS & BUSINESS MAIL ENTRY	No
665	ADMIN & CLERICAL - ADMINISTRATION	No
666	PURCHASING	No
668	ADMIN & CLERICAL - OPERATIONS SUP	No
670	FACILITIES	No
671	POSTMASTER/INSTALLATION MANAGER	No
673	ADMIN & CLERICAL - INDUSTRIAL ENGINEERING	No
676	ADMIN & CLERICAL - MAINTENANCE SUPPORT	No
679	ADMIN & CLERICAL - TRANS & NETWORKS	No
680	ADMIN & CLERICAL - PLANT & EQUIPMENT	No
	ADMIN & CLERICAL - PROCESSING & DIST,	
681	INTERNATIONAL	No
683	ADMIN & CLERICAL - ACCOUNTING SERVICES	No
686	ADMIN & CLERICAL - LABOR RELATIONS	No
689	ADMIN & CLERICAL - PERSONNEL SERVICES	No
692	ADMIN & CLERICAL - SAFETY/HEALTH	No
	ADMIN & CLERICAL - MAILING REQUIRE. & BUS. MAIL	
697	ENTRY	No
703	SUPERVISOR, FINANCE	No
745	MAINTENANCE OPERATIONS SUPPORT	No
747	BUILDING SERVICES	No
748	BUILDING SERVICES	No
749	BUILDING SERVICES	No
750	POSTAL OPERATING EQUIPMENT	No
751	POSTAL OPERATING EQUIPMENT	No
752	POSTAL OPERATING EQUIPMENT	No
753	BUILDING SYSTEMS EQUIPMENT	No
754	BUILDING SYSTEMS EQUIPMENT	No
758	MANAGER, TRANSPORTATION & NETWORKS	No
759	SUPERVISOR, TRANSPORTATION OPERATIONS	No
764	MOTOR VEHICLE SERVICE	No
765	MOTOR VEHICLE OPERATORS	No
766	TRACTOR TRAILER OPERATOR	No
780	TRAINING - OPERATIONS SUPPORT	No
781	TRAINING - MAIL PROCESSING	No
783	TRAINING - PLANT & EQUIPMENT MAINTENANCE	No
783	TRAINING - PLANT & EQUIPMENT MAINTENANCE	No
785	TRAINING - FINANCE	No
786	TRAINING - HUMAN RESOURCES	No
787	TRAINING - CUSTOMER SERVICES SUPPORT	No
788	TRAINING - ADMINISTRATION	No
798	MISCODED/UNCODED MAIL	Yes
831	MLOCR - OUTGOING PRIMARY	Yes
871	MPBCS-OUTGOING PRIMARY	Yes

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910	CSBCS - BOX MAIL	No
911	CSBCS - DELIVERY POINT SEQUENCE DPS	No
922	MANAGER, IN-PLANT SUPPORT	No
927	MANAGER, DISTRIBUTION OPERATIONS	No
928	SUPERVISOR, DISTRIBUTION OPERATIONS	No
933	MANAGER, MAINTENANCE OPERATIONS	No
934	MANAGER, INFORMATION SYSTEMS	No
936	SUPERVISOR , ACCOUNTING SERVICES	No
951	SUPERVISOR, MAINTENANCE OPERATIONS	No
952	MGR/SUPV, MAINT. OPERATIONS SUPPORT	No
957	Timekeeping Only	No
958	REHABILITATION	No
959	LIMITED DUTY	No
988	LOANED AS OIC	No
989	LOANED TO HQ,INSP SRV, REG	No
990	LOANED AS SUPERVISOR	No
991	LOANED AS CLERK	No
992	LOANED AS MAIL HANDLER	No
993	LOANED AS CITY CARRIER	No
994	LOANED AS SPECIAL DELV MESS	No
995	LOANED AS VMF MECH	No
996	LOANED AS MAINT BLD SRVS	No
997	LOANED AS RURAL	No

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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.

RESPONSE:

a) PGLs may or may not be used locally by support staff as a planning / staffing tool.

b) These data are not available. To the extent that PGLs are relied upon by individual BMCs now that those facilities have been converted to MODS, the data are developed locally.

c) Please see the response to part (b).

d) Confirmed.