

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes)

Docket No. R2005-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS VAN-TY-SMITH (APWU/USPS T11-1-4)
(June 20, 2005)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS Witness Eliane Van-Ty-Smith (T-11). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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CERTIFICATION

I hereby certify that I have this date served the foregoing document in accordance with the rules of practice.

Darryl J. Anderson
O'Donnell, Schwartz & Anderson, P.C.

June 20, 2005

APWU/USPS-T11-1 On page 3 of your testimony, you state that the beginning point for you cost calculations is C/S 3 clerk and mailhandler expenses reported by finance number and LDC. Please identify the report from which these numbers are acquired and from which postal system database that report is generated.

APWU/USPS-T11-2 For the data referred to above in APWU/USPS-T11-1, please explain how dollar values are assigned to each LDC. Please explain the role of the base LDC from the employees master file in this process. Please explain the role of the MODS operations codes in this process. Please explain which LDC would have priority in places where those two LDCs might not match.

APWU/USPS-T11-3 On pages 10-11 of your testimony, you discuss the assignment of tallies from MODS facilities. The process seems to be to assign the tally to the cost pool to which the MODS operations code is assigned. Is that a correct understanding? However, at the end of that description is a statement about LDC groupings. Does the latter statement mean that tallies are then assigned to the LDC? If so, what is the purpose of that, since the tallies have already been associated with a specific cost pool?

APWU/USPS-T11-4

- a) If an employee is observed "not handling mail" but is programming an optical character reader, would that tally be allocated to the OCR cost pool? How would the type of mail for that tally be determined?
- b) If an employee is observed loading an optical character reader, is that considered a handling tally? Would the type of mail be determined by the piece in the employee's hand at the time the reading was done?