

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

RESPONSE OF POSTAL SERVICE WITNESS BOZZO
TO INTERROGATORY OF TIME WARNER (TW/USPS-T12-1)
(July 1, 2005)

The United States Postal Service hereby provides the response of witness Bozzo to the following interrogatory of Time Warner, filed on June 17, 2005: TW/USPS-T12-1.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 1, 2005

Response of United States Postal Service Witness Bozzo
To Follow-Up Interrogatory of Time Warner Inc.

TW/USPS-T12-1 Please refer to your response to TW/USPS-T11-11, redirected from witness Van-Ty-Smith. The table provided with that answer includes measures of TPH (total piece handlings) for MODS numbers where in the past MODS provided only estimates of workhours. In some cases it is not immediately obvious what units of measure are used to represent volume. Please explain the units of measure used for volume, as well as the method by which the volume measures are obtained (e.g., by weighing, machine counts, etc.) for each specified MODS number in each of the following cost pools:

- (1) 1POUCHNG (MODS 120-123 and 345)
- (2) 1DSPATCH (MODS 124-129);
- (3) 1OPTRANS (MODS 114);
- (4) 1OPBULK (MODS 115-117 and 185-186);
- (5) 1OPPPREF (MODS 110-112, 180, 181, 328, 329, 343, 344);
- (6) REWRAP (MODS 109); and
- (7) 1SUPPORT (MODS 798 – miscoded/uncoded mail).

Response.

The units of workload measurement and methods are specified as follows.

(1)-(2) Pouching (MODS 120-123 and 345), 1DSPATCH (MODS 124-129)

The workload unit is a sack, equivalent sack, or tray. The method is to count all sacks or trays that require work effort in these operations as they enter the operation. See Handbook M-32, Section 2-2.5.1, filed as USPS-LR-J-165 in Docket No. R2001-1.

(3)-(5) 1OPTRANS (MODS 114), 1OPBULK (MODS 115-117 and 185-186),
1OPPPREF (MODS 110-112, 180, 181, 328, 329, 343, 344)

I am informed that beginning in FY 2004, opening unit workload credit is based on the conversion of weight to pieces based on the source type of the mail. That is, converted pieces weighed from these operations to a distribution operation

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are also credited as a workload of the opening unit operation.

(6) REWRAP (MODS 109)

There is no official workload measurement method for this operation. I am informed that sites recording volume for this operation may have implemented local workload measures.

(7) 1SUPPORT (MODS 798, Miscoded/uncoded mail)

Workload credit is optional. The credit is based on a conversion of trays to pieces.

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.

Eric P. Koetting

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