

DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF  
UNITED PARCEL SERVICE REDIRECTED FROM WITNESS BRADLEY (USPS-T-14)  
(UPS/USPS-T14-57, 59 AND 60)

The United States Postal Service hereby provides responses to the following  
interrogatories of United Parcel Service: UPS/USPS-T14-57, 59 and 60, filed on  
September 17, 1997.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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October 1, 1997

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO THE INTERROGATORIES OF UPS  
REDIRECTED FROM WITNESS BRADLEY**

UPS/USPS-T14-57. Please discuss the way in which the Postal Service staffs peak volume periods. Include in your discussion answers to the following:

(a) Is the Postal Service more likely to schedule overtime work during peak volume periods than during normal volume periods? Please explain your answer.

(b) Is the Postal Service more likely to schedule part-time or casual workers during peak volume periods than during normal volume periods? Please explain your answer.

(c) What is the mix of the use of overtime pay for workers as compared to the use of part-time or casual workers during peak volume periods? What is the mix during normal volume periods?

(d) Do supervisors work on sorting machines during peak volume periods? Please explain your answer.

(e) Are employees moved from one activity to another based on volume and need? Please explain your answer.

(f) What is the change in the mix of employees performing an activity when volume increases or decreases, and do these changes differ by facility? Please explain your answer.

**Response:**

- a. Yes, the workload during peak volume periods such as November and December require overtime to such an extent that it is planned. In addition there are contingency plans at the local level that call for overtime in case of extraordinary events (e.g. the UPS strike).

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- b. Yes. The workload requires additional personnel and the employment limits are relaxed in November and December (i.e. AP 3 and 4, see the APWU Agreement, article 7.1.B, in LR-H-88)
- c. Part time flexibles, casuals, etc. are used to supplement the regular workforce as workload dictates. When peak volume periods are anticipated, the supplemental workforce will be scheduled and/or worked more straight time hours. Overtime is primarily used when unanticipated workload materializes or when the skills of a particular employee or group of employees are needed beyond their normal schedule (e.g., employees with incoming secondary sort scheme knowledge for a zone with an unusually high volume or unscheduled absences).
- d. It depends on the circumstances as detailed in Article 1.6 of the APWU Agreement (LR-H-88)
- e. Yes within the limits described in Article 7.2 of the APWU Agreement (LR-H-88)
- f. When volume increases in November and December or due to extraordinary circumstances (e.g. the UPS strike), more casuals are employed due to the workload. The requirements may differ by facility since some facilities have a greater need for personnel without special skills or training.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE  
(Redirected from Witness Bradley, USPS-T-14)

**UPS/USPS-T14-59.** What data over time are available on the total number of items, by class, delivered by the Postal Service to their ultimate destinations? Please provide such data.

**UPS/USPS-T14-59 RESPONSE:**

The Postal Service does not collect data on the total number of items, by class, delivered to their ultimate destinations.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
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(Redirected from Witness Bradley, USPS-T-14)

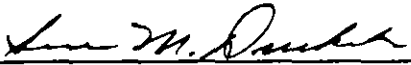
**UPS/USPS-T14-60.** What data are available on the number of pieces, by class, that arrive into a site and the number of pieces that leave a site? Please provide any data *available on total inflow and outflow by site and FYAP for the MODS and PIRS sites* used in the data in your testimony and analysis.

**UPS/USPS-T14-60 RESPONSE:**

Data on pieces processed at a site are contained in witness Bradley's analysis (USPS-T-14). See USPS Library Reference H-148. The Postal Service does not collect data on the number of pieces, by class, that arrive into a site and the number of pieces that leave a site.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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