POSTAL RATE AND FEE CHANGES, 1997   Docket No. R97–1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
TIME WARNER, INC. (TW/USPS–T4–18–20)
AND NASHUA ET AL. (NDMS—T4–9)
REDIRECTED FROM WITNESS MODEN

The United States Postal Service hereby provides responses to the following

interrogatories of Time Warner, Inc.: TW/USPS–T4–18–20, and NDMS/USPS—T4–9,

filed on August 22, 1997, and redirected from witness Moden.
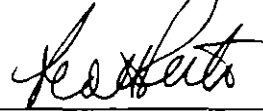
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 5, 1997

TW/USPS-T4-18   Please refer to your answer to TW/USPS-T4-7H, which includes the filing, under protective conditions, of LR-H-22I, containing the Site META user's guide.   You indicate that Site META was required for RCBS activation, is required for activation of new facilities and is used at local discretion to adjust local staffing.

a.   For what types of new facilities is Site META required? Is it for example required for activation of each new station, branch and associate office? Is it required for each facility modification, for example when a facility adds an annex to provide additional capacity? Please explain.

b.   How frequently does a typical, already activated, RCBS use Site META to adjust its staffing?

c.   Besides the required use of Site META, how many facilities have used it on a discretionary basis? Of those that have used it on a discretionary basis, how many are (1) processing and distribution centers; (2) other SCF's; (3) BMC's(4) associate offices; (5) stations and branches; and (6) other types of facilities? Please also indicate the typical frequency with which these facilities use Site META.

d.   Among the facilities that have used Site META at least once on a discretionary basis, how many use it regularly? Of those that use it regularly, how many are (1) processing and distribution centers; (2) other SCF's; (3) BMC's; (4) associate offices; (5) stations and branches; and (6) other types of facilities? Please also indicate the typical frequency with which these facilities use Site META.

e.   How many staffing positions has the Postal Service been able to (1) eliminate; or (2) avoid creating as a direct result of applying Site META? Please explain your answer. If you do not know the answer, please name the facilities you know of that were able to reduce staffing positions and how many positions were eliminated in each facility.

Response:

a. Site META is not required for the activation of stations, branches, or

associate offices. It is not generally required for facility modifications.

b. Site META is an event driven model. Unless a major operational change

occurs, the original Site META model is not normally updated.

c. We are not aware of any HQ functional areas that requires reporting the discretionary use of Site META. We are only aware of two processing and distribution centers where recent discretionary Site META studies were performed.

d. We are not aware of any facilities that perform discretionary Site META studies on a regular basis.

e. There is no required reporting of the results of Site META studies.

TW/USPS-T4-19

<u>a.</u>   Please confirm that Site META is described in LR-H-221 as having two types of scheduling programs, the "initial scheduler" and the "optimizer scheduler", the latter of which takes over six hours to run. Please also indicatec which size problem, i.e. number of different operations, employees and tours, the six hour running time estimate refers to.

<u>b.</u>   Does the required use of Site META, referred to in your response to TW/USPS-T4-7H, include use of the "optimizer scheduler"?

<u>c.</u>_   Among facilities that use Site META on a regular and discretionary basis, how many base their facility staffing schedule directly on output from the Site META "optimizer scheduler"? Of those, how many are (1) processing and distribution centers; (2) other SCF's; (3) BMC's; (4) associate offices; (5) stations and branches; and (6) other types of facilities?

<u>d.</u>   The Site META "optimizer scheduler" is referred to LR-H-221 as reducing the idle time produced by the initial scheduler. According to the applications that have been made to actual data in real facilities, how much idle time is typically left after application of the "optimizer scheduler"?

Response:

<u>a.</u> Yes, there are two types of scheduling programs. The "optimizer scheduler"

could require up to six hours to run when modeling a processing and distribution

center having three operating shifts, several thousand employees, and up to 100

operations.

<u>b.</u> No.

<u>c.</u> No facilities base their staffing schedules directly on the output of the

"optimizer scheduler."

<u>d.</u> This information is not available.

TWI/USPS-T4-20

a.   Does the Site META program determine staffing and hiring requirenients that take into account (1) seasonal variations in mail volume; (2) sick leave and other absenteeism; or (3) projected attrition levels? If yes, please indicate where such features are described in LR-H-221 and refer to any illustraition of output from such model features.

b.   Does the Site META program produce staffing schedules that allow movement of individual employees from one operation to another as the processing requirements change during that employee's tour? If yes, please indicate where such features are described in, LR-H-221 and refer to any illustration of output from such model features.

c.   Does the Site META program produce staffimg schedules that tell individual clerks and mailhandlers what and where their work assignments will be during a given tour, week or longer period? If yes, please indicate where such features are described in LR-H-221 and refer to any illustration of output from such model features.

d.   Does the Site META program allow live rescheduling and staffing adjustments during a given tour based on actual as opposed to projected work requirements? If yes, please indicate where such features are described in LR-H221 and refer to any illustration of output from such model features.

e.   To the extent that your answers to parts a, b, c and d above are negative, please indicate whether the Postal Service has other computerized tools that perforn the functions referred to, and provide a full documentatiori of such other tools. To the extent that your answers are affirmative, please describe the number of facilities, by facility type, that regularly use each feature.

f.   How does the Site META program handle staffing at manual sorting operations with the "surge" at the end of Tour 3 and Tour I referred to in your testimony? If any output exists describing the application to this situation with real data, please provide it.

g.   Does output from the Site META "optimizer scheduler" in your opinion either (1) predict, (2) explain; or (3) justify the sharply increased break-time, other "non-handling" or empty equipment costs revealed by the IOCS in recent years? Please explan your answer.

h.   Could increased use of the Site META "optimizer scheduler" in your opinion help reduce the sharply increased break-time, other "non-handling" or empty equipment costs revealed by the IOCS in recent years? Please explain your answer.

Response:

a. The Site META model is for a discrete "average" week in an "average" Accounting Period. Impact of seasonal variation can be estimated by modeling selecting weeks higher or lower than "average." The model does not take into account sick leave or other absenteeism. The Site META model does not take into account projected attrition.

b. No, Site META does not identify or track individual employees.

c. No, Site META does not provide individual job assignments.

d. No, Site META is not a real time scheduling and staffing tool.

e. No.

f. Site META flows mail from initial distribution to downstream distribution operations, and estimates the workhours required in each processing time period. The model does not hold manual mail until the end of a Tour. We are not aware of any real output data based on the situation you have described.

g. Site META deals only with direct distribution operations. We have no data or experience which would allow us to answer this question.

h. Site META deals only with direct distribution operations. We have no data or experience which would allow us to answer this question.

NDMS/USPS-T4-9.

How does the unit cost of processing parcels on an SPBS (when operated in a keying mode) compare with the unit cost of processing machinable pieces (flats or parcels) on an FSM 1000 (when operated in a keying mode)?

Response:

Unit costs can be computed using the test year wage of 25.445 from LR-H-146 and the

piggyback factors of 1.7736 for the FSM 1000 (see LR-H-77, page 233 and the

piggyback factor of 1.7085 for the SPBS Other MODS category.

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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September 5, 1997