

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BOZZO,
USPS-T-12, TO INTERROGATORIES OF TIME WARNER INC.: (TW/USPS-T12-1-2)**
(July 3, 2006)

The United States Postal Service hereby provides the responses of Witness Bozzo (USPS-T-12) to the following interrogatories of Time Warner Inc.: TW/USPS-T12-1-2, filed on June 19, 2006.

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 3, 2006

Response of United States Postal Service Witness A. Thomas Bozzo,
USPS-T-12, To Interrogatories of Time Warner, Inc.

TW/USPS-T12-1 Please refer to the tables provided as attachments to your response to TW/USPS-T11-1bc.

- a. Please identify the MODS operations where volumes shown represent something other than counts of individual mail pieces (e.g., if they refer to counts of sacks or trays rather than of the pieces that are in the sacks or trays). Please state in each case what the volume measures mean.
- b. For each MODS operation identified in part a above, please describe how the volume measures shown in your tables are obtained.

Response.

a.-b. In general, all operations other than those that handle individual pieces of mail will have workloads that consist of handling articles such as bundles, sacks, trays, or other containers. The affected operations are those assigned to the LDC 13 and LDC 17 cost pools. For mechanized operations, the volume measures are machine counts of the articles processed on the machines (e.g., pieces or bundles in SPBS operations, trays in tray sorting operations). For other "indirect" distribution operations, the workloads are generally counts of the sacks, trays, etc., processed in the operations; my understanding is that, except as noted below, workload reporting for manual "indirect" operations is optional. See also my response in Docket No. R2005-1 to TW/USPS-T12-1.

Opening Units (operations 110-117, 180-186, 343-344): The workload is the FHP count for mail weighed from the opening units to "direct" distribution operations.

Response of United States Postal Service Witness A. Thomas Bozzo,
USPS-T-12, To Interrogatories of Time Warner, Inc.

Flat Mail Preparation (operation 035): The workload is the FHP count for mail weighed from 035 to direct distribution operations.

Platform (operations 210-213, 351): The workload is the inbound or outbound trip, recorded in WebTIMES.

Response of United States Postal Service Witness A. Thomas Bozzo,
USPS-T-12, To Interrogatories of Time Warner, Inc.

TW/USPS-T12-2 Please describe the various ways (e.g. weighing, measuring of lineal feet, etc.) in which estimates of first handling pieces (FHP) to flats sorting operations are measured in today's post offices. Please describe also the approximate frequency of each method, and the factors used to convert measures taken into estimates of numbers of flats. Please state also whether different conversion factors are used for different categories of flats (e.g., magazines, newspapers, sealed envelopes, etc.)

Response.

My understanding is that flat sorting FHP are computed by weighing the mail and converting the weight to pieces using national conversion rates. See Handbook M-32 (April 2000), section 2-1.1.1.4, provided in the response to TW/USPS-2.

The conversion factors vary for different types of mail; see Handbook M-32 (April 2000), section 2-2.2.1 for a list of the source/type codes.

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.

Frank R. Heselton

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