

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2006-1

SIXTH SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
(TW/USPS-T42-33-36)
(July 6, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatoies to United States Postal Service witness McCrery (USPS-T-42).

If witness McCrery is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or by another person capable of providing an answer.

Respectfully submitted,

s/ _____
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SIXTH SET OF INTERROGATORIES TO WITNESS McCRERY (USPS-T-42)

TW/USPS-T42-33 Please refer to your answer to TW/USPS-T42-29a, in which you indicate that MODS number 140 is used by AI employees for mail preparation.

- a. Please confirm that MODS number 140 was not used during FY2005. If not confirmed, please provide the total FY2005 volume and workhours.
- b. Will both volumes and workhours be recorded under MODS number 140? If volumes are recorded, will the MODS reports distinguish between volumes fed to different AFSM-100 sorting schemes (e.g., outgoing versus incoming)?
- c. To the extent that AI systems were used for inducting flats in FY2005, were the AI workhours recorded under MODS number 035? If no, how were they recorded?

TW/USPS-T42-34 Please refer to your answer to TW/USPS-T42-29b, in which you state: "Flats inducted into an AFSM may also be second or third handling pieces, therefore, not recorded as FHP."

- a. Please note that the question referred only to flats inducted into the AFSM-100 via the AI system and state whether one can infer from your answer that the AI system is or will be used also to induct flats that already have been sorted at a previous flats sorting operation. If this inference is correct, please state the circumstances under which the AI system will be used to induct flats from previous flats sorting operations and what advantages it offers for such flats.
- b. Please confirm that MODS numbers 401-407 are used to record volumes and workhours at AFSM-100 machines that are equipped with AI systems. If not confirmed, what numbers are used and what is the use of MODS numbers 401-407?

TW/USPS-T42-35 In your response to TW/USPS-T42-12d you describe current procedures for dealing with bundles that break on an APPS machine.

- a. Do the procedures you describe in that answer also apply to bundles that break during: (1) an SPBS bundle sorting; (2) a LIPS bundle sorting; or (3) manual bundle sorting from an

opening belt? If the procedures differ in any way, please describe the differences.

- b. In Docket No R2001-1, witness Kingsley provided, as part of her response to AOLTW/USPS-T39-10 (Tr. 9/2173-74), a copy of an April 3, 2001 letter to "Managers, In-Plant Support," signed by Mr. O'Tormey, that stresses the importance of package recovery. Is there any more recent set of written instructions to plant managers dealing with the subject of package recovery? If yes, please provide a copy. If no, please state whether the instructions in the letter referred to above still apply and, to the extent that they do not, explain what is different today.
- c. The April 3, 2001 letter referred to above complained that the recommended procedures for package (bundle) recovery often were not followed, that many plants had no recovery plan in place and that many continued to key individual pieces (from broken bundles) on the SPBS machines. Based on your observations of mail processing plants today, do you believe that plants today do have a plan for recovery of broken bundles and that recommended procedures generally are being followed? If no, what steps are being taken to improve the situation?
- d. Assume that during an APPS, SPBS/LIPS or manual bundle sorting operation a bundle is observed that still is intact but appears to have been weakened in some way, so that it is at risk of breaking under subsequent bundle handlings. What instructions apply to such bundles at different types of bundle sorting operations? Should employees whenever practicable attempt to reinforce such bundles?
- e. When the pieces in a broken bundle are still together, is bundle recovery always the preferred action? If no, what are the exceptions?
- f. In your observation, approximately what percentage of broken bundles are able to be recovered in today's operating environment? If it is impossible to specify even a rough percentage, please state at least whether you think it is more or less than 50%. Additionally, please indicate how you believe the percentage may vary among various types of bundle sorting operations.
- g. Has the Postal Service performed any survey to determine the percentage of broken bundles that end up being recovered in current bundle sorting operations? If yes, please describe any

such survey and its results, and provide copies of any available documentation.

- h. Please assume that a mail processing employee sees a broken bundle on an APPS, SPBS or manual opening belt and that the pieces in the bundle still are together, so that recovery is possible. Approximately how much time would it typically take this employee to remove the bundle, reinforce it and place it back on the belt? Is it likely that such an operation could take as much as a half minute?
- i. Has the Postal Service performed any survey to determine the average time it takes an employee to recover a broken bundle and repair it? If yes, please describe any such survey and its results, and provide copies of any available documentation.

TW/USPS-T42-36 Please describe the various types of sacks currently being used by the Postal Service as well as any new types of sacks that it may use in the future. Please describe the characteristics of various types of sacks in terms of size, durability, opening/closing methods (e.g., use of strings, padlocks, Velcro, etc.) and other handling characteristics that affect costs and carrying capacity. Please identify also the types of sacks commonly used for different classes and shapes of mail as well as those used for the Postal Service's internal operations and indicate which types of sacks will continue to be commonly used as the Postal Service reduces its total sack use.