

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2006-1

ERRATUM TO MISCAPTIONED "THIRD SET" AND CORRECTED COPY OF
FOURTH SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
(TW/USPS-T42-29-31)
(June 20, 2006)

The document filed on June 19, 2006 captioned "Third Set of Interrogatories of Time Warner Inc. to United States Postal Service Witness McCrery(TW/USPS-T42-29-31)" should instead have been captioned "Fourth Set of Interrogatories . . . to . . . Witness McCrery." A copy of that document with a corrected cover page is appended hereto.

Respectfully submitted,

s/

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FOURTH SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
(TW/USPS-T42-29-31)
(June 19, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatories 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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**FOURTH SET OF INTERROGATORIES TO WITNESS McCRERY
(USPS-T-42)**

TW/USPS-T42-29 In Docket No. R2005-1 you indicated, in response to interrogatory TW/USPS-T29-1, that employees working at the automated induction (AI) units attached to some AFSM-100 machines would (June 19 response to TW/USPS-T29-9 in the same docket you indicated that “prepped” flats leaving an 035 operation would be weighed for determination of FHP at the subsequent flats distribution operation.

- a. Please confirm that AI employees still use MODS number 035. If not confirmed, please explain.
- b. Please confirm that flats inducted into an AFSM-100 after being “prepped” at an attached AI unit will be recorded as first handling pieces (FHP) to the AFSM-100. Please explain if not confirmed.
- c. Please confirm that flats inducted into an AFSM-100 after being “prepped” at an attached AI unit will be recorded as total pieces handled (TPH) from operation 035. Please explain if not confirmed.
- d. Please explain how the “weighing” to determine piece volume from the AI to the AFSM100 is accomplished. For example, is there an automatic piece count performed by the AI/AFSM system, or are records of some kind kept by AI/AFSM employees?

TW/USPS-T42-30 Please assume that a given mail processing plant uses AFSM-100 machines for most of its flats sorting but that the incoming secondary flats sorting to a particular 5-digit zone is done manually. Assume further that a rolling container (e.g., hamper, APC) at the plant contains 5-digit flats bundles to that 5-digit zone.

- a. Please confirm that such a container will either:
 - (1) be transported to a flats preparation area (MODS 035); or
 - (2) be transported to a manual flats case, located either at the plant or in a delivery unit (DU).

If there are other possible paths for the container described above, please explain what they are and approximately how frequently they occur.

- b. Please confirm that in the first case described in part a. above, the processing steps involved in distributing the flats in the container to carrier route are as follows. Please explain if any of the steps below do not normally occur, or if there are other steps that should be included.

- (1) The container is transported to the 035 flats preparation area;
 - (2) an 035 employee takes a bundle from the container, removes the bundling material and orients the flats;
 - (3) the 035 employee places the flats from the broken bundle neatly on top of other flats in an ergo cart, making sure they are oriented the same way as the other flats;
 - (4) the ergo cart is transported to the manual flats case, located either at the plant or at a delivery unit;
 - (5) a clerk at the manual flats case grabs a bundle (handful) of flats from the ergo cart;
 - (6) the same clerk sorts the flats into the manual case; and
 - (7) the flats are swept and transported to the carriers who will deliver them.
- c. Please confirm that in the second case described in part a. above, the processing steps involved in distributing the flats in the container to carrier route are as follows. Please explain if any of the steps below do not normally occur, or if there are other steps that should be included.
- (1) The container is transported to the manual flats case, located either at the plant or at a delivery unit;
 - (2) a clerk at the manual flats case takes a bundle from the container, removes the bundling material and orients the flats;
 - (3) the same clerk sorts the flats into the manual case; and
 - (4) the flats are swept and transported to the carriers who will deliver them.
- d. It might appear that when flats end up being sorted manually, a separate 035 type “prepping” operation before the flats are sent to the flats case simply adds handling steps and thereby costs, when compared with sending the bundles directly to the flats case where the same employee breaks the bundles and sorts the flats directly into the case. Please state whether you agree with this conclusion. If you do not agree, please explain why not.
- e. Please confirm that the practice of “prepping” flats in a separate operation from where the flats are sorted exists in order to get the maximum productivity from the flats sorting machines. If not confirmed, please explain.
- f. Please assume that the incoming secondary flats distribution to the 5-digit zone referred to above is performed only at the delivery unit. Please confirm that in that case 5-digit bundles for the zone will not be “prepped” and the bundles will be sent unbroken to the DU.

- g. Please assume that the incoming secondary flats distribution to the 5-digit zone referred to above is performed manually at the plant rather than at the delivery unit. Will 5-digit bundles for the zone in that case be sent directly to the flats cases, or will they first be sent to a flats preparation area? If both are possible, please indicate which is most common.

TW/USPS-T42-31 Do employees at a manual 035 flats prepping operation have instructions to put aside certain flats that are not suitable for processing on the AFSM-100? If yes, what are those instructions?