

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF TIME WARNER INC.
(TW/USPS-1-2)

The United States Postal Service hereby files its responses to the above-listed interrogatories, filed on June 19, 2006 and due on July 3, 2006.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 3, 2006

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INTERROGATORY OF TIME WARNER, INC.

TW/USPS-1 In response to interrogatories TW/USPS-T27-7-8, redirected from witness Talmo, the Postal Service indicates that it has no information regarding either industrial engineering based or empirically based productivity rates for manual sack sorting performed at SCF's.

- a. Please confirm that MODS number 235 is used by employees engaged in manual sorting of sacks and outsides at MODS facilities. If not confirmed, please describe how this MODS number is used.
- b. According to witness Bozzo's response to TW/USPS-T13-11b, redirected from witness Van-Ty-Smith, MODS number 235 had TPH equal to 393,787,584 sacks/outsides and a total of 3,606,561 recorded workhours in FY2005. Dividing the two gives approximately 109 sacks/outsides per workhour. Please confirm that this is an empirically based measure of the productivity rate at MODS operation 235.
- c. Are there any other MODS numbers that are designated for employees engaged primarily in manual sorting of sacks and/or outside parcels? If yes, please list them and describe further the particular function associated with each such MODS number.
- d. Is there any MODS number designated for employees at a sawtooth type operation? If yes, what is it?
- e. If the Postal Service knows any reason why the MODS productivity rate at MODS operation 235 might not be suitable for the purpose of estimating the costs associated with manual sack sorting at SCF's, please explain those reasons.

Response:

- a. Operation 235 is used to manually separate sacks, pouches, or outsides on saw tooth platforms, slides, chutes, conveyors, multislides, and in bullpen operations. Workload credit is optional for this operation.
- b. Confirmed that the calculation is empirical. Not confirmed that the resulting calculation is meaningful.
- c. Yes, the operations are:
 - Operation 320 O/G Primary Parcels (Priority) – Outsides
 - Operation 325 I/C Primary Parcels (Priority) – Outsides

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Operation 348 Manual Sack and Outside Sorting – International
Operation 100 Parcel Post Distribution – Outgoing
Operation 102 Manual Parcel Distribution - International Export
Operation 103 Manual Parcel Distribution - International Import
Operation 130 Parcel Post Distribution – SCF
Operation 200 Parcel Post Distribution – Incoming

- d. Yes, operations 235 and 348.
- e. The Postal Service does not recommend the empirical computation of productivity shown above because volume recording is neither required nor performed on a common basis for this operation, and because the computational results for a number of offices range from statistically improbable to physically impossible.

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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