

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. (ERRATA)
(TW/USPS-1-2)

The United States Postal Service hereby revises the filing of its responses to the above-listed interrogatories, filed on June 19, 2006. The original filing inadvertently omitted the response to TW/USPS-2, which is now included.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 7, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE TO
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, multisides, 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
 - Operation 348 Manual Sack and Outside Sorting – International
 - Operation 100 Parcel Post Distribution – Outgoing

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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.

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TW/USPS-2 Please provide a copy of the most recent version of the MODS manual. Please indicate also whether a revised version of the manual is expected in the near future, and whether substantial changes have been made since publication of the current version. If there is more than one type of MODS manual, please state what they are and provide copies of each.

RESPONSE:

Please see library reference USPS-LR-L-150, Management Operating Data System (MODS) Manual. A new version is anticipated in approximately six months. Changes in the new version might be characterized as significant, but not substantial. The new version will feature more precise definitions of the MODS operations.

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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