

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2006-1

SEVENTH SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS McCRERY
(TW/USPS-T42-37-39)
(July 10, 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/ _____
John M. Burzio
Timothy L. Keegan

COUNSEL FOR
TIME WARNER INC.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
Telephone: (202) 965-4555
Fax: (202) 965-4432
E-mail: burziomclaughlin@covad.net

**SEVENTH SET OF INTERROGATORIES TO WITNESS MCCRERY
(USPS-T-42)**

TW/USPS-T42-37

- a. Please describe the conditions under which a facility using an FSM-1000/UFSM-1000 machine would do so under respectively:
 - (1) MODS numbers 196-197;
 - (2) MODS numbers 305-308
 - (3) MODS numbers 441-448;
 - (4) MODS numbers 450-451;
 - (5) MODS numbers 461-468; and
 - (6) MODS numbers 811-819.
- b. Please confirm that the FSM-1000/UFSM-1000 can be used in either an automated feed mode with a single feeding station or in a manual feed/manual key mode. Please state also whether it is possible to use the two modes simultaneously and any restrictions that may apply to such simultaneous use.
- c. Which MODS numbers are used with the automated feed mode and which are used with the manual feed/key mode?
- d. Do these machines still have a manual feed/automated read mode, as they used to have before being equipped with automated feeding stations? If yes, when is such a mode used and with which MODS numbers?
- e. Your testimony states (at page 19):

The pieces processed on the UFSM 1000 in today's operating environment have many of the same characteristics as those processed on the AFSM 100s, but the flats can be thicker and/or heavier. In plants with both AFSM 100s and UFSM 1000s, the UFSM 1000s are often utilized as an additional piece of flat sorting equipment, with unique responsibilities in terms of the schemes processed on the machine.

Would you also say that many of the flats processed on UFSM 1000 machines could also be processed on an AFSM-100?
- f. Assume that a group of oversized or overweight magazines are identified in the bundle preparation stage as unsuitable for AFSM-100 processing and that they instead are taken to an FSM-1000/UFSM-1000 machine. In what mode is that machine likely to be run to process these flats and what MODS number is likely to be used?

- g. Assume that some Periodicals in newspaper format are identified as unsuitable for AFSM-100 processing and that they instead are taken to an FSM-1000/UFSM-1000 machine. In what mode is that machine likely to be run to process these newspapers and what MODS number is likely to be used?

TW/USPS-T42-38 What are the current guidelines for how many carrier routes a 5-digit zone should have before it is considered worthwhile to perform its incoming secondary flats distribution on automation rather than manually? For example, if a 5-digit zone has only five carrier routes, is incoming flats secondary distribution likely to be performed manually? What if there are ten carrier routes, etc.?

TW/USPS-T42-39 Part c of MPA interrogatory MPA/USPS-T42-1 to you was redirected to witness Smith. In his answer, witness Smith indicates that according to IOCS tallies of manual sorting of Periodicals flats at post offices, stations and branches, only 63.6% is for incoming secondary distribution. Review of the remaining tallies will show that most of them have a value "C" in the response to Question 18D02, indicating a manual incoming primary sort.

- a. Is it true that a significant portion of incoming primary flats distribution today is performed not in the plants, where there is access to automated sorting, but in local post offices, stations and branches? If yes, please describe the conditions under which this occurs and any plans the Postal Service may have for bringing this sorting into the plants where automated flats sorting is available.
- b. Do some associate offices refer to their incoming flats distribution as an incoming primary sort, even if it may result in a distribution of flats to carrier route? If yes, how frequently does this occur?
- c. Do any local post offices, stations and branches in today's postal system perform outgoing flats distribution? If yes, how frequently does this occur and for what reasons?