

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 WITNESS McCRERY
TO INTERROGATORIES OF TIME WARNER, INC.
(TW/USPS-T42-33-36)
(July 20, 2006)

The United States Postal Service hereby provides the response of witness McCrery to the above-mentioned interrogatories of Time Warner, Inc., filed on July 6, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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?

Response:

- a. Confirmed
- b. Yes and no, respectively.
- c. Yes.

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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?

Response:

- a. Any flats requiring further sortation on the AFSM 100 will be inducted using the AI system. Flats received from a previous flat sorting operation do not require unbundling, de-compensating, or facing of the bundles, as the flats are received in a flat mail tray ready to be prepped into an Automation Compatible Tray (ACT).
- b. Not confirmed. MODS 401-7 are used for AFSM 100 machines equipped with AHS. MODS 461-7 are used for AFSM 100 machines equipped with AI. MODS 141-7 are for the AFSM 100s with both.

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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

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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.

Response:

- a. In addition to the steps described in TW/USPS-T42-12d, the operators on SPBS, LIPS and manual bundle sorting operations have the ability to “perfect” each questionable bundle before sortation due to individual bundle handling by the operators. Rubber-bands and straps are often used in such operations to secure broken bundles. The ability to handle an individual bundle is limited on the APPS due to automated processing.
- b. See response to TW/USPS-T42-12d. The instructions provided are a part of the recent Certification & Standardization process that is used to certify APPS machines in the field. Since the letter in question, APPS has been deployed at certain sites and Electronic Mail Improvement Reporting (eMIR) is used in lieu of PS form 3749.

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- c. Generally speaking, all plants with SPBS machines have a recovery plan for broken bundles and keying of individual pieces is discouraged.
- d. Employees should attempt to reinforce such bundles whenever practicable.
- e. If the order of the pieces has not been jeopardized e.g., in a carrier-route bundle, bundle recovery is always the preferred action.
- f. No data exists that quantifies the extent of bundle recovery. Based on my observations, in facilities where bundle sorting is still on SPBS equipment or in manual units, recovery of broken bundles can be estimated to be over 50%. In facilities with APPS the percentage of recovery of broken bundles would be considerably less due to the automated handling environment.
- g. I am not aware of any such survey.
- h. Assuming that recovery of the broken bundle is possible within reasonable limits, the time taken to reinforce a broken bundle depends on the equipment, location of the broken bundle, proximity to banding / strapping material and equipment, etc. For example, SPBS keyers may have access to rubber-bands at the induction stations for reinforcing questionable bundles. SBPS and APPS feed station operators may have access to a strapping machine. It is likely that such an operation could take half of a minute or more.
- i. I am not aware of any such survey.

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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.

Response:

Please refer to *Postal Bulletin* 221466, 01/20/2005, pages 76-78 and *Postal Bulletin* 22180, 05/11/2006, pages 41-42 for articles on two new sacks which are replacing much of the previous sack stock. The May 11 article indicates that the new sacks will be deployed over the next 6 to 12 months. The only existing sack stock which will be retained is EIRS 09, the registry sack, and 18G, the security liner. The *Postal Bulletin* articles include pictures of the sacks unfilled, being filled, and closed. Pictures of the retained sack stock appear below.

In general, number one and two sacks are for flats and bundles of letters (green First-Class, brown Periodicals, white Standard). Number 3 sacks are used for Package Services.

Canvas sacks (except EIRS 09) and Plastic Sacks (except EIRS 01V and 03V) are closed with a drawstring. EIRS 09 and the nylon sacks are closed by tightening a strap around the top of the sack until it can be latched closed. EIRS 09 would also have a lock applied to the latch so that an unlocking device is require to open the sack. EIRS 09 is used for internal operations.

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The current sacks are:

1. EIRS 01 – Codura Nylon domestic Mailbag w/Locking Cord fastener closure, Size 31.00”W x 41.00”L
2. EIRS 01VM - Semi-Clear plastic mailbag w/Velcro closure, Size 31.50”W x 44.50”L
3. EIRS 03VM - Semi-Clear plastic mailbag w/Velcro closure, Size 31.50”W x 34.50”L
4. EIRS 09 - Codura Nylon registered Mail pouch w/strap closure, Size 31.00”W x 40.00”L
5. EIRS 12M – Airmail Nylon Priority Mail pouch w/strap closure, Size 31.00”W x 41.00”L
6. EIRS 13 – Airmail Nylon First Class Mail pouch w/strap closure, Size 31.00”W x 41.00”L
7. EIRS 18G – Airmail Nylon Security Liner, Size 70.00”W x 64.00”L
8. EIRS 20M – Airmail Nylon Express Mail pouch w/strap closure, Size 31.00”W x 41.00”L

In addition, the following are used less frequently.

1. EIRS 01P (#1) – Plastic mailbag w/ drawtape and plastic label holder closure, Size 31.00”W x 40.00”L
2. EIRS 02P (#2) - Plastic mailbag w/ drawtape and plastic label holder closure, Size 24.00”W x 40.00”L
3. EIRS 03P (#2Brn) – Plastic mailbag w/ drawtape and plastic label holder closure, Size 24.00”W x 40.00”L
4. EIRS 04P (#3) - Plastic mailbag w/ drawtape and plastic label holder closure, Size 24”W x 25”L
5. EIRS 05 - (#3Brn) - Canvas/Cotton Brown Sack w/cord and metal label holder closure, Size 25”W by 24”Long
6. EIRS05P (#3Brn) - Plastic mailbag w drawtape and plastic label holder closure, Size 24”W x 25”L

MAIL TRANSPORT EQUIPMENT LIST

MAILBAGS

EIRS 01



#1 SACK WHITE
CANVAS, CORDURA,
MIXED
40 X 31
200 PER PALLET

EIRS 01P



#1 SACK PLASTIC
WHITE
39 X 30
500 PER PALLET

EIRS 01V



#1 SACK PLASTIC
CLEAR
44.5 X 32.5
500 PER PALLET

EIRS 02P



#2 SACK PLASTIC
WHITE
36 X 27
500 PER PALLET

EIRS 03P



#2 SACK PLASTIC
BROWN
36 X 27
500 PER PALLET

EIRS 03V



#3 SACK PLASTIC
CLEAR
34.5 X 25
500 PER PALLET

EIRS 04P



#3 SACK PLASTIC
WHITE
30 X 24
500 PER PALLET

EIRS 05



#3 SACK BROWN
CANVAS, COTTON,
POLY
25 X 24
650 PER PALLET

EIRS 05P



#3 SACK PLASTIC
BROWN
25 X 23
500 PER PALLET

EIRS 09



#2 POUCH CANVAS,
CORDURA WHITE
40 X 24
200 PER PALLET

EIRS 12M



US PRIORITY NYLON
MODIFIED
40 X 31
600 PER PALLET

EIRS 13



FCM #1 POUCH
NYLON GREEN
36 X 24
400 PER PALLET

EIRS 18G



SECURITY POUCH
LINER, NYLON
RED, GREEN OR GREY
31 X 42 X 49
50 PER PALLET

EIRS 20M



LG EXPRESS POUCH
NYLON MODIFIED
40 X 31
600 PER PALLET