

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 INTERROGATORY OF TIME WARNER (TW/USPS-T20-9),  
REDIRECTED FROM WITNESS MILLER  
(July 24, 2006)

The United States Postal Service hereby provides the response of witness McCrery to the above-listed interrogatory of Time Warner, Inc., filed on July 10, 2006: redirected from witness Miller.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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WITNESS MILLER**

**TW/USPS-T20-9**

a. Please confirm that in reality some non-carrier route flats do undergo manual incoming secondary sorting even if none of the conditions described in the previous interrogatory hold, for example when:

- (1) the facility serving the flat's destination ZIP code has an AFSM-100 machine but no scheme on that machine for the 5-digit zone that the flat is destined to;
- (2) available machine capacity is insufficient to process all eligible flats in time for a critical dispatch

Please explain if you cannot confirm.

b. Are you aware of still other reasons why a non-carrier route flat may end up undergoing manual incoming secondary sorting in today's postal system? If so, please specify them.

**Response:**

(a) Confirmed.

(b) I can think of the following circumstances that could lead to non-carrier route flats being processed manually: some plants maintain "hot 2C" lists in which mail pieces are, to a large extent, processed manually to minimize the potential for service issues, some plants maintain separate manual operations for processing newspapers due to the problems associated with placing some of those mail pieces on equipment, mailings could be entered after the automation incoming secondary processing window had expired, mail for a class with significantly higher volume (e.g., Standard Mail) could be given processing precedence over mail for a class with lower volume if the classes are processed to maintain a separation and the equipment cannot be used to finalize both mail classes within the processing window, equipment breakdowns could result in the

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implementation of contingency processing plans, power outages/disruptions could result in the implementation of contingency processing plans, adverse weather conditions could affect the staffing level and transportation network and result in the implementation of contingency processing plans, and mail from upstream operations could be delayed.