

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-T42-37-39)
(July 24, 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 10, 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-T42-37

- 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?

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Response:

- a. (1) MODS numbers 196-197 have recently been updated to reflect UFSM 1000 OCR international mail processing; (2) MODS numbers 305-308 pertain to international mail mechanized processing; (3) MODS numbers 441-448 pertain to UFSM 1000 processing of outgoing primary and outgoing secondary, incoming primary and incoming secondary, Managed Mail, incoming SCF, Box Section, and incoming non-scheme flats. (4) MODS numbers 450-451 pertain to UFSM 1000 processing of outgoing Priority Mail and incoming Priority Mail flats; (5) MODS numbers 461-468 have recently been updated to reflect AFSM 100 processing in automatic induction (AI) mode for outgoing primary and outgoing secondary, incoming primary and incoming secondary, Managed Mail, incoming SCF, Box Section, and incoming non-scheme flats. (6) MODS numbers 811-819 have recently been updated to reflect UFSM 1000 OCR processing for outgoing primary and outgoing secondary, incoming primary and incoming secondary, Managed Mail, incoming SCF, Box Section, and outgoing Priority and incoming Priority flats.
- b. Confirmed. I am not aware of any restrictions that may apply to simultaneous use.
- c. MODs numbers on the UFSM 1000 used in the automated feed mode are 196-197, and 811-819. MODs numbers used in the keying mode are 305-308, and 441-451.

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d. No.

e. Yes.

f. & g. The UFSM 1000 flat sorter is more likely to be run in the keying mode for processing both oversized or overweight magazines and/or Periodicals using MODS numbers in the 440 series for processing flats on the UFSM 1000.

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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.?

Response:

A 5-digit zone should have sufficient volume -- approximately 500 or more pieces per route per day -- to warrant incoming secondary flats distribution on automation. In addition, any zone with 10 or more routes, regardless of volume, should also be on automation.

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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?

Response:

- a. No.
- b. No. I am not aware of any associate office that refers to the incoming secondary flats distribution as an incoming primary flats sort.
- c. No. I am not aware of any post office, station or branch that performs outgoing flats distribution.