

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF POSTAL SERVICE WITNESS MILLER
TO INTERROGATORY OF TIME WARNER INC.
(TW/USPS-T20-2)
(June 15, 2005)

The United States Postal Service hereby provides the response of witness Miller (USPS-T-20) to interrogatory TW/USPS-T20-2, submitted on June 1, 2005.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Keith E. Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252, Fax -3084
keith.e.weidner@usps.gov

RESPONSE OF POSTAL SERVICE WITNESS MILLER TO
INTERROGATORY OF TIME WARNER

TW/USPS-T20-2. In your response to POIR 4, question 5, you show sack sorter (SSM) productivity rates of 165 pcs/hr in Quarter 1 and 189 pcs/hr in Quarter 2 of FY 2005.

- (a) Please confirm that "pcs / hr" in this case refers to sacks per workhour.
- (b) Please describe the activities, other than keying from sack labels, that these productivity rates include. In particular, state whether they include (1) dumping sacks from containers; (2) any secondary sorting at roller table operations; (3) removing full containers; (4) repairing or removing sacks that are damaged or open; (5) clearing jams; or (6) any other sack sorter related activities.

RESPONSE:

a) Confirmed.

b) It is my understanding that the tasks covered by MODS operation numbers 238 and 239 performed at BMCs include:

SSM keyers

SSM floor support operations

SSM sack roller table operations

Based on this definition, tasks (1), (4), (5) and (6) would not be included.