

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 (TW/USPS-T27-3 - 6),
REDIRECTED FROM WITNESS TALMO
(June 6, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the following interrogatories of Time Warner, Inc., filed on May 23, 2006: TW/USPS-T27-3 - 6, redirected from witness Talmo.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 6, 2006

**RESPONSE OF POSTAL SERVICE WITNESS McCRERY TO
INTERROGATORIES OF TIME WARNER
REDIRECTED FROM WITNESS TALMO**

TW/USPS-T27-3. Please assume that a rolling container (e.g., hamper, APC) arrives at an SCF with Periodicals sacks that have been placed in that container at an upstream postal facility. Assume further that the container includes sacks with SCF, 3-digit, 5-digit, carrier routes and carrier route presort. Assume also that some of the 5-digit, carrier routes and carrier route sacks will be transferred to their respective DDUs before being opened, i.e., the SCF is not the destinating facility for all the sacks in the given container.

a. Please confirm that before the 3-digit/SCF sacks in this container can be dumped at a 3-digit/SCF bundle sorting operation they must be separated from the 5-digit, carrier routes and carrier route sacks that arrived in the same container. Please confirm also that, unless the SCF has a sack sorting machine capable of reading sack labels, performing such a separation involves at least (1) manually reading the sack label and (2) manually placing the sacks that are to be taken to the 3-digit/SCF bundle sorting operation in a separate container. Please explain if not confirmed.

b. Please confirm that before the 5-digit, carrier routes and carrier route sacks to a particular 5-digit zone can be moved to their respective bundle dumping/sorting operations they must be separated from sacks to other 5-digit zones as well as from the 3-digit/SCF sacks that are in the same container. Please confirm also that, unless the SCF has a sack sorting machine capable of reading sack labels, performing such a separation involves at least (1) manually reading the sack label and (2) manually placing the sacks for that 5-digit zone in one or more separate containers. Please explain if not confirmed.

RESPONSE:

(a)-(b) Confirmed, but these separations described in subparts (a) and (b) are accomplished together in a single operation (i.e., the sacks are not handled twice).

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TW/USPS-T27-4. Please assume that a rolling container (e.g., hamper, APC) arrives at an ADC with Periodicals sacks that have been placed in that container at an upstream postal facility. Assume further that the container includes sacks with ADC, SCF, 3-digit, 5-digit, carrier routes and carrier route presort. Please confirm that before the ADC sacks in this container can be dumped at an ADC bundle sorting operation they must be separated from the sacks with higher presort level that arrived in the same container. Please confirm also that, unless the ADC has a sack sorting machine capable of reading sack labels, performing such a separation involves at least (1) manually reading the sack label and (2) manually placing the sacks that are to be taken to the ADC bundle sorting operation in a separate container. Please explain if not confirmed.

RESPONSE:

Confirmed.

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TW/USPS-T27-5. Please assume that a BMC is sorting Periodicals sacks that are then sent to different SCF's and ADC's in the BMC service area.

a. Is it likely that such a BMC sack sort operation would place the 3-digit sacks to the particular SCF in a container separate from the container(s) into which 5-digit, carrier routes and carrier route sacks to the same SCF are sorted? If you believe this is likely, then please provide an approximate estimate of the percent of 3-digit sacks, sorted to the destinating SCF by a BMC, that are segregated at the BMC from sacks with higher presort going to the same SCF.

b. Is it likely that such a BMC sack sort operation would place the sacks to a particular 5-digit zone within the SCF in a container separate from the container(s) into which other sacks to the same SCF are sorted? If you believe this is likely, then please provide an approximate estimate of the percent of 5-digit sacks, sorted to the destinating SCF by a BMC, that are segregated at the BMC from sacks to other 5-digit zones within the same SCF.

RESPONSE:

(a) No, not likely.

(b) No, not likely.

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TW/USPS-T27-6. Please assume that an outgoing sack operation at a Periodicals ADC sorts sacks destined to other ADCs. Consider the sacks to a given destinating ADC that is not also the originating ADC. Is it likely that such an outgoing ADC sack sort operation would place the ADC sacks to the given destinating ADC in a container separate from the container(s) into which SCF, 3-digit, 5-digit, carrier routes and carrier route sacks to the same ADC are sorted? If you believe this is likely, then please provide an approximate estimate of the percent of ADC sacks, sorted to the destinating ADC at the originating ADC, that are segregated at the originating ADC from sacks with higher presort going to the same destinating ADC.

RESPONSE:

No, not likely.