

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER INC.,
REDIRECTED FROM WITNESS TALMO (TW/USPS-T27-7-9)
(June 6, 2006)

The United States Postal Service hereby provides its institutional responses to interrogatories TW/USPS-T27-7-9, which have been redirected from witness Talmo (USPS-T-27).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF TIME WARNER INC., REDIRECTED
FROM WITNESS TALMO (USPS-T-27)

TW/USPS-T27-7. Please provide an estimate, consistent with Postal Service industrial engineering methodology, of the productivity rate (sacks per man-hour) in manual sack sorting operations performed at SCFs. Please provide all relevant source references and documentation.

RESPONSE:

The Postal Service lacks the data necessary to respond to this request.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF TIME WARNER INC., REDIRECTED
FROM WITNESS TALMO (USPS-T-27)

TW/USPS-T27-8. Please state whether the Postal Service has any empirically derived estimate of the productivity rate (sacks per man-hour) of manual sack sorting operations performed at SCFs. If such an estimate exists, please provide it along with all relevant documentation.

RESPONSE:

The Postal Service has no information responsive to this request.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF TIME WARNER INC., REDIRECTED
FROM WITNESS TALMO (USPS-T-27)

TW/USPS-T27-9. LR-L-85 indicates nine different mail processing productivity rates. It cites the PGL (planning guidelines) as the source for two and Postal Service testimonies in docket No. R2000-1 as sources for the other seven. Please note that the following questions are not about which Postal Service witnesses may have used the same data in the past, but rather about the way in which each productivity rate estimate was originally obtained.

- (a) Please state which of the cited productivity rates originate from the application of industrial engineering methodology, and for each such rate explain specifically which movements and actions on the part of postal employees were assumed in order to arrive at the cited rates.
- (b) Please state which of the cited productivity rates originate from Postal Service surveys. For each rate that originated from a survey please state the year in which the survey was conducted and provide references and all relevant documentation.

RESPONSE:

The “Empty Pallet Handling,” “Dump Sacks at Bundle Sort,” and “Empty Sack Handling” productivities originate in Planning Guidelines (PGLs). As explained by witness Eggleston in Docket No. R2001-1, “all the productivities in the PGLs were produced using MTM analysis. In MTM analysis, standards are set for lengths of time of certain activities.” See Docket No. R2001-1, Tr. 11A/3994 (response of witness Eggleston to UPS/USPS-T25-15). The Postal Service has been unable to locate documentation underlying these productivities.

The “Move OWC to Bundle Sort Operation” and “Empty OWC Handling” productivities originate in Docket No. R84-1, USPS-T-14P (specifically, the “Container Move” productivity on USPS-T-14P). In that docket, witness Byrne conducted a study of the Buffalo ASF during PFY 1982. As explained by witness Byrne in an interrogatory response to the OCA, the “Container Move” productivity was one of several productivities “regularly used by the ASF staff in their

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF TIME WARNER INC., REDIRECTED
FROM WITNESS TALMO (USPS-T-27)

analyses of ASF operations.” See Docket No. R84-1, Tr. 13/7268-70 (response of witness Byrne to interrogatory OCA/USPS-T14-13(b)). As also discussed by witness Byrne in that response, he lacked “any data underlying the derivation of [those] productivities.”

The “Move Pallet to Bundle Sort Operation” productivity originates in Docket No. R84-1, USPS-T-14KK (specifically, the “Move Pallet to Outbound Dock” productivity on USPS-T-14KK). In that docket, witness Byrne conducted a study of the Philadelphia and San Francisco BMCs and the Buffalo ASF during PFY 1982. As explained by witness Byrne in an interrogatory response to Time, Inc., he derived the “Move Pallet to Outbound Dock” productivity by averaging the individual facility productivities he measured for that operation. See Docket No. R84-1, Tr. 13/7352-53 (response of witness Byrne to interrogatory Time/USPS-T14-12(a)); see also page 59 of witness Byrne’s testimony. The BMC productivities were derived from production records from each sampled BMC during Postal Quarter 3 of PFY 1982, as explained at page 15 of witness Byrne’s testimony and in his response to interrogatory OCA/USPS-T14-7(a) (see Docket No. R84-1, Tr. 13/7242).

The “Unload Pallet,” “Dump Pallet,” and “Unload OWC” productivities originate in Docket No. R97-1, USPS-LR-H-132, which was an update to witness Byrne’s Docket No. R84-1 study. The productivity data presented in that library reference is based on volume and workhour reports provided by six BMCs during FY 1996.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF TIME WARNER INC., REDIRECTED
FROM WITNESS TALMO (USPS-T-27)

Please see USPS-LR-H-132 for further information on the derivation of these
productivities.