

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

NOTICE OF FILING OF REVISED RESPONSE OF
POSTAL SERVICE WITNESS MARC D. MCCRERY
TO INTERROGATORY OF NATIONAL NEWSPAPER ASSOCIATION
[NNA/USPS-T42-1] [ERRATA]
(August 16, 2006)

The United States Postal Service hereby files witness McCrery's revised response to NNA/USPS-T42-1. The words "per hour" have been deleted in the second sentence of the response. The second sentence now reads: "In practice, sites need a minimum volume of approximately 5,000 pieces to consider operating in the automation mode." The correction is made in the attached revised response. This response supersedes the original response filed on July 28, 2006.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY
TO INTERROGATORIES OF
THE NATIONAL NEWSPAPER ASSOCIATION

Revised August 16, 2006

NNA/USPS-T42-1 Please refer to your testimony on p. 19 where you state:
"More commonly, small volumes of flats for a particular destination are processed manually when the volume is insufficient to justify the fixed costs of setting-up and sweeping a scheme for such a small volume. "

- a. Do operations guidelines or procedures set minimum volume standards for the use of UFSM 1000s? If so, please provide a copy. If not, please explain why.
- b. If your response to part a. is no, do plant managers have sole discretion in the decision to use the UFSM 1000 or to move mail to manual sorting?
- c. Are you aware of circumstances where manual sorting is opted for in plants for purposes of occupying workers who otherwise have no work to do? If your response is yes, are these practices approved by the Postal Service?

Response:

- (a) There are no management instructions containing guidelines or procedures for the use of UFSM 1000s in regards to minimum volume standards. In practice, sites need a minimum volume of approximately 5,000 pieces to consider operating in the automation mode. From my experience, it should be noted that site-specific circumstances may necessitate the use of UFSM 1000 equipment with a fewer number of pieces (e.g., lack of manual cases, manual distribution clerks, in particular, scheme qualified clerks, etc.).
- (b) Supervisors of the flat sorting operation can make the decision to utilize the UFSM 1000 to sort mail when it is feasible to do so. Plant managers, however, have the ultimate responsibility for the overall plant operation.
- (c) No, I am not aware of any circumstances where manual sorting is opted for in plants in order to keep workers occupied.