

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

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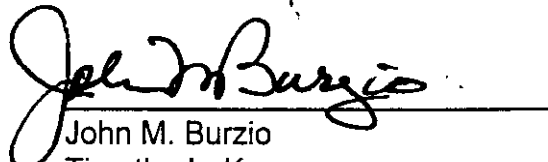
POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

INTERROGATORIES OF AOL TIME WARNER INC.
TO WITNESS KINGSLEY (AOL-TW/USPS-T39-15-19)
(November 9, 2001)

Pursuant to sections 25 and 26 of the Rules of Practice, AOL Time Warner Inc. (AOL Time Warner) directs the following interrogatories to United States Postal Service witness Kingsley (USPS-T-39). If witness Kingsley is unable to respond to any interrogatory, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

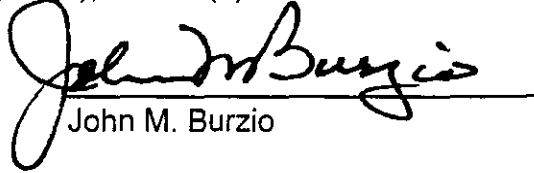

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.


John M. Burzio

November 9, 2001

**SECOND SET OF INTERROGATORIES TO WITNESS KINGSLEY
(USPS-T-39)**

AOL-TW/USPS-T39-15 In response to AOL-TW/USPS-T39-5f you refer to "the AFSM 100 National Standardization Guide." Is that document available in the present docket? If yes, please provide a reference. If not, please provide a copy.

AOL-TW/USPS-T39-16 Please refer to your response to AOL-TW/USPS-T39-7, where you say that the FSM-1000 will have one automated feed and three keying consoles in the test-year configuration.

- a. Is the target 7000 pieces-per-hour throughput capacity referred to on page 15 in your testimony expected to come from running flats through the automated feeder only?
- b. Will the one automated feeder and the three keying consoles be used simultaneously in normal operations?
- c. What is the maximum FSM-1000 throughput based on the speed of the FSM-1000 belt?
- d. What kinds of flats will be keyed on the FSM-1000 keying consoles?
- e. Will attempts be made to run flats that are rejected in the automated feed mode through the machine again using the keying mode?
- f. How many employees will staff an FSM-1000 under normal operating conditions and how will the work be divided between them?

AOL-TW/USPS-T39-17 In your response to AOL-TW/USPS-T39-14 you commented on the sortation at a delivery unit of bundles of carrier route presorted flats from either a 5-digit pallet or a 5-digit hamper. You pointed out that in this type of sortation bundles are normally not thrown into receptacles but "typically placed into flat tubs or other containers where breakage should not be an issue at this point." And in response to part e of that interrogatory you confirmed that packages at this point are sorted "not by throwing but by placing the package on the carrier's ledge, or on a shelf or in a cubbyhole designated for that carrier so that the possibility of package breakage does not occur."

Please comment on the corresponding situation where the carrier route packages are contained in a carrier routes sack, rather than a hamper or pallet.

- a. Please confirm that the term "carrier routes sack" normally refers to a 5-digit sack containing carrier route presorted bundles, going to more than one carrier route

within the given 5-digit ZIP code area. If not confirmed, please provide an alternative definition.

b. Assume that a bundle inside such a sack has broken during transport and is not easily recoverable. What would the clerk handling this mail normally do with the pieces from this bundle? In particular, what is the likelihood that he would do each of the following?

- (1) Bring each loose flat to the appropriate carrier.
- (2) Collect the loose flats and take them to a manual incoming secondary flats case at the DDU.
- (3) Collect the loose flats and return them for incoming secondary sortation at the main office.
- (4) Any other action not listed above. Please explain fully.

c. Would the contents of this sack normally be dumped on a table or opening belt before sorting the bundles to each carrier, or would the clerk sort directly from the sack?

d. Would the clerk distributing the contents of a carrier routes sack to the carriers normally have scheme knowledge?

e. Assume that instead of being carrier routes, a sack is labeled as being only for a single carrier. Would the clerk handling it in that case take the sack's contents, including any loose pieces from broken bundles, directly to the receptacle for the appropriate carrier, rather than mix it with mail going to other carriers? If no, please explain why not.

AOL-TW/USPS-T39-18 In your response to AOL-TW/USPS-T39-14, part c, you indicate that any loose pieces found in a 5-digit hamper at a DDU are likely to be recovered by a clerk rather than a carrier, because "volume has to be measured prior to being cased by the carrier."

a. Does the statement mean that all volume going to every single carrier has to be measured?

b. Why does volume have to be measured prior to being cased by the carrier?

c. What postal data system do the measurements of mail volumes going to carriers belong to?

d. What precisely does the clerk who handles mail before it goes to a carrier measure and record regarding the volume to that carrier?

AOL-TW/USPS-T39-19 In your response to AOL-TW/USPS-T39-5, part e, you indicate that an AFSM typically may run 3 or 4 incoming secondary schemes at the same time.

- a. Will the same 3-4 schemes normally be worked together every night, or may it change from night to night?
- b. How often will a facility revise its incoming secondary sort plan?