

ADVO, INC. INTERROGATORIES TO USPS WITNESS STEVENS (USPS-T-19)

ADVO/USPS-T19-1. USPS LR-L-1 states:

Each evaluated rural carrier is paid a salary determined by the evaluated time for his or her route. The evaluated time is developed based on route factors such as route length; boxes served; the number of letters delivered; the number of papers, magazines, and catalogs delivered; and box holder mail volume. These route factors are measured in periodic regular counts, called "National Rural Mail Counts," and, when circumstances dictate, in special counts. During a National Rural Mail Count, all mail for nearly all rural routes is counted by shape (but not by class), and the actual time for individual routes is recorded daily during a two-to four-week period (typically during February and March). The mileage, number of boxes, volume of mail, and other applicable items provide a value for evaluated time used to determine the pay for individual routes.

Once the evaluation is performed on his route, please identify the ways in which a rural carrier's weekly salary may change as a result of workload changes prior to another "mail count" evaluation being performed. Please include in that response a discussion of when the rural carrier may receive overtime compensation.

ADVO/USPS-T19-2. Referring to the time variables on page 6 of USPS LR-L-70, please provide the following for each of those variables for each route category (i.e., evaluated and other) in spreadsheet format:

- (a) The average weekly times for the FY04 data
- (b) The average weekly time for the FY05 data
- (c) The evaluation time standards used during the FY04NMC
- (d) The evaluation time standards used during the FY05 NMC

ADVO/USPS-T19-3. Referring to page 7 of USPS LR-L-70, please provide definitions that differentiate among the variables called "Total Hours," "Total Minutes," and "Actual Hours.

ADVO/USPS-T19-4. For a particular year, are earlier workload counts for a route ever used with current year evaluation time standards to determine evaluated times? If so, please explain the circumstances where this is done.

ADVO/USPS-T19-5. If routes are ever excluded from the annual NMC, please explain the reasons why that may occur.