

UNITED STATES OF AMERICA
Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE BOARD
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LLOYD RAYMOND (USPS-T13-1-9)
February 17, 2000

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 to the United States Postal Service, dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T13-1. Please refer to page 7, line 7 through page 8, line 21 of your testimony.

- (a) Did you perform a statistical analysis to determine the number of data observations that would constitute a statistically accurate sample in your data collection efforts? If your answer is yes, please delineate the methodology.
- (b) Did you perform a statistical analysis and/or stratification to determine which routes should be selected for data collection? If your answer is yes, please provide the analysis.
- (c) Please indicate whether the resulting database could be considered random and representative of the population, including all pertinent documentation on which you base your conclusions.
- (d) Did you perform an analysis of the statistical implications of the decision to eliminate potential implementation sites that did not have Delivery Unit Computers?

OCA/USPS-T13-2. Why did you perform a two-phase study for the data collection? Did you have a methodology that presented the statistical implications of such an approach? If so, please explain.

OCA/USPS-T13-3. It is the OCA's understanding that letter carriers do not, in general, have their activities monitored by data collectors.

- (a) Did you perform any analysis of potential differences between the work actions of the observed carriers on the days on which they were observed in comparison to their work actions on days during which they were not observed?

- (b) Did you have access to any such studies or analyses performed by other researchers? If so, please provide copies of all documents related to such studies or analyses.

OCA/USPS-T13-4. Please refer to Section IV of your testimony, headed "Procedure," on page 10 and following.

- (a) Did you develop or have a handbook or other documentation used to convey the data collection procedure in a standardized way to all data collection personnel? If so, please discuss and provide the documentation furnished consistently to all personnel.
- (b) Did you have training sessions conducted on a formal, consistent basis with all data collection personnel? If so, please discuss and provide all relevant information.

OCA/USPS-T13-5. Please refer to Section V, "Quality Assurance" of your testimony on page 13. In this section you discuss the review and correction of potential data collection errors.

- (a) Please provide information on the total number of data observations accepted as correct, the number of observations determined to be incorrect, and the statistical (or other) rules and methodologies used to eliminate the observations considered as being incorrect.
- (b) Did you perform an analysis of the outliers? If so, please provide the analysis and statistical tests used.

OCA/USPS-T13-6. Please refer to page 14 of your testimony, lines 7 through 8 where your state, "Of the 844 route-days observed 100 route-days were studied from sites and routes chosen at random."

- (a) Were the randomly observed routes representative of the population of routes? Please explain.
- (b) Do you have a study to verify whether the aforesaid routes were random?
- (c) Were the remaining 744 route-days a sample that was not random? Do you have a study or analysis of the statistical accuracy of the 744 nonrandom route-days? If so, please provide all related documents.
- (d) Would the data you provided to witness Baron have produced significantly different proportions if only the random sample were used to generate the proportions? If only the nonrandom sample were used?
- (e) Please provide separate data sets for the random and nonrandom samples.

OCA/USPS-T13-7. Please refer to page 7 of your testimony, line 19, through page 8, line 4, which discusses the selection process for zip codes, cities, and carrier routes.

- (a) Please provide copies of the paperwork, including memos, letters, emails, faxes, studies, and/or other documents, sent internally by the Postal Service management to the various proposed data collection site locations.
- (b) Please indicate what criteria, studies, and analyses were used in determining the selection of the sites in (a).
- (c) If information as to the selection process by the various criteria is unavailable to you, please refer this interrogatory to the Postal Service.

OCA/USPS-T13-8. Please refer to your testimony on page 5, lines 3 through 5, wherein you indicate that the objective of the study was to gather data to establish a workload managing system.

- (a) Were the data collected specifically for this rate case, or were the data collected for other, possibly additional, objectives? Please explain your answer in detail.
- (b) If the data collection was undertaken for purposes other than this rate case, please identify when the Postal Service decided to use the data for the rate case. Please provide all related documents.
- (c) Were any changes made to the data (scrubs, adjustments, estimates, modifications, etc.) in order for the data to be used in this rate case?
- (d) Please provide a copy of any other data simultaneously collected as part of the data collection effort if the data have not already been provided.

OCA/USPS-T13-9. Please provide the actual or, if unavailable, estimated costs of the data collection efforts, including total contractor costs as well as person hours of all Postal Service personnel involved in the data collection efforts outlined in your testimony.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Stephanie Wallace

Washington, D.C. 20268-0001
February 17, 2000