

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

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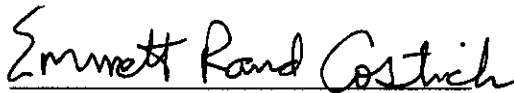
Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DONALD M. BARON (USPS-T12-1-7)
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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Director
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OCA/USPS-T12-1. Please refer to page 7, lines 7 through 12 of your testimony, wherein you define the measurement of the stops effect, which you indicate is the minimum of the load times recorded during the 1985 load-time field test at stops receiving only one letter piece.

- (a) Please explain what possible actions or inaction in which a carrier might be engaged during the time period between accessing the mailbox and loading the mailbox.
- (b) How would a trained data collector be able to verify that the letter carrier was engaged in whatever action or inaction occurs during the stops effect as delineated in (a)?
- (c) Please confirm that the amount of time called the "stops effect" and fixed with respect to volumes is measured in terms of the amount of time spent to load a single piece of letter mail. If you do not confirm, please explain.
- (d) In determining the duration of the stops effect, did you find that the value of the stops effect was different between BAM, SDR, and MDR routes? Please explain.

OCA/USPS-T12-2. Please refer to USPS-LR-I-159, page 20. Please provide (or indicate where provided) a definition for each column heading.

OCA/USPS-T12-3. Both the access time and load time can be clearly delineated as carrier activities. For example, a carrier would be able to identify the activity in which he or she was engaged during access or load.

- (a) How would a carrier delineate the activity in which she or he was engaged during the stops effect?
- (b) Why would the stops effect not more logically be a part of the load time?

OCA/USPS-T12-4. Please refer to lines 15 through 17 on page 32 of your testimony, wherein you discuss witness Raymond's data collection efforts. You indicate that witness Raymond collected data for loading, driving, route-access (FAT), route-access (CAT), collection, and street support functions.

- (a) Did witness Raymond collect data for the stops effect? Why or why not; please explain.
- (b) Was the stops effect observable to the data collectors? Were barcodes or activity codes or descriptions given to the data collectors for the stops effect? Please explain.

OCA/USPS-T12-5. Please refer to line 19, page 32, through line 4, page 33, wherein you indicate that the Engineering Standards data set accounts for recent operational practices much more accurately than does the 1986 data set.

- (a) Please define the measure of accuracy, and whether it is a statistical measure.
- (b) Please explain the major changes between the two data sets in their reflection of current operational practices.
- (c) Please identify all changes in operational practices to which you refer.
- (d) Was the 1986 data set created for the purpose of a rate case or rate analysis? Please list all purposes for creation of the 1986 data set.

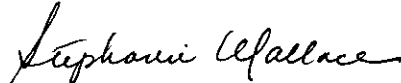
OCA/USPS-T12-6. Please refer to lines 2 through 10 on page 34 of your testimony.

- (a) What was the date of coverage for the Carrier Route Master File that you used?
- (b) You indicate that four of the ES routes could not be located on the CRMF; please explain this discrepancy.
- (c) Does this discrepancy call into doubt the accuracy of the files?

OCA/USPS-T12-7. Please refer to lines 2 through 8 on page 36 of your testimony. You indicate that the new street-time proportions are substantially different from those previously presented. Have you examined these differences to whether they are statistically significant? If so, what were the results? If not, why not?

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