

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO UPS INTERROGATORIES
(UPS/USPS-T13-3-5)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the United Parcel Service: UPS/USPS-T13-3-5, filed on February 3, 2000. Objections were filed to interrogatories UPS/USPS-T13-1 and 2.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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February 17, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-3. Refer to Appendix A, page 17, of your testimony, where you present a process flow for delivery activities.

(a) Confirm separately each of the following.

(i) The process flow labeled "Park & Loop" shows that, for any given stop, the carrier first completes activities related to collection, delivery, and accountables for "non-parcel" mail.

(ii) After the completion of these activities for a stop, and if the carrier has not completed the loop, the carrier continues to the next stop where non-parcel mail collection, delivery, and accountable activities are first completed. If you do not confirm, explain.

(b) Confirm that the process flow labeled "Park & Loop" shows that after the carrier completes a loop, the carrier then performs activities related to "parcels." If you do not confirm, explain.

RESPONSE:

(a) (i) Not confirmed. "Parcel" mail is handled in the same manner as all other mail, except in instances when the size, shape, or weight of the piece mandates that the piece be handled separately from other pieces on the loop. In those instances where a dedicated access and delivery are mandated by a "parcel's" size, then your description in "(i)" is the typical process.

(ii) Consistent with my answer to "(i)" above, yes, this is the typical process.

(b) Consistent with my answer to "(i)" above, yes, this is the typical process.

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UPS/USPS-T13-4. (a) Consider the following factual scenario. A carrier on a park and loop route has completed collection, delivery, and accountable activities for "non-parcel" mail on the loop. The carrier has two "parcels" in the Long Life Vehicle (LLV) that remain to be delivered to two different addresses on the loop. Consider the following sequence of activities that the carrier could use in order to deliver the parcels:

Step 1: The carrier walks to the LLV after completion of the loop.

Step 2: The carrier drives the LLV to the address where the first parcel is to be delivered.

Step 3: The carrier retrieves the first parcel from the LLV.

Step 4: The carrier walks to the first residence to deliver the parcel

Step 5: The carrier delivers the parcel.

Step 6: The carrier walks to the vehicle from the first residence.

Step 7: The carrier drives to the second residence.

Step 8: The carrier retrieves the second parcel from the LLV.

Step 9: The carrier walks to the second residence to deliver the parcel.

Step 10: The carrier delivers the parcel.

Step 11: The carrier walks to the vehicle from the second residence.

Step 12: The carrier drives to the next loop to continue deliveries.

Confirm that this sequence of activities (Step 1 through Step 12) is consistent with standard Postal Service delivery practice for parcels and show, in a manner similar to the examples provided in pages 11-12 of your testimony, how each of the preceding steps 1 through 12 should be recorded in the Engineered Standards database. If you do not confirm, (i) describe the standard Postal Service delivery practice for parcels in the factual scenario provided, and (ii) identify the source (manual, handbook, etc.) of standard Postal Service delivery practice for parcels, and (iii) in a manner similar to the examples provided in pages 11-12 of your testimony, show how each of the preceding steps 1 through 12 should be recorded in the Engineered Standards database.

(b) Confirm that carriers do on occasion follow the sequence described in (a) in situations such as that indicated.

(c) Describe the circumstances under which the carrier would be likely to follow the sequence in (a) in situations such as that indicated.

(d) Describe the circumstances under which the carrier would not be likely to follow the sequence in (a) in situations such as that indicated.

RESPONSE:

(a)

Step 1: The carrier walks to the LLV after completion of the loop.

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This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S00	T05	K10
On Route	N/A	Park & Loop	N/A	Walking	Walking Flat

Step 2: The carrier drives the LLV to the address where the first parcel is to be delivered.

This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

Step 3: The carrier retrieves the first parcel from the LLV.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L08	A00	WT03	S04	J04	K01
Vehicle	N/A	Park & Loop	Residential Outside	Parcel	LLV

Step 4: The carrier walks to the first residence to deliver the parcel.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	K10
On Route	N/A	Park & Loop	Residential Outside	Parcel	Walking Flat

Step 5: The carrier delivers the parcel.

This would be *Load* time.

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Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	H10
Point of Delivery	N/A	Park & Loop	Residential Outside	Parcel	Drop to Customer

Step 6: The carrier walks to the vehicle from the first residence.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K10
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	Walking Flat

Step 7: The carrier drives to the second residence.

This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

Step 8: The carrier retrieves the second parcel from the LLV.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L08	A00	WT03	S04	J04	K01
Vehicle	N/A	Park & Loop	Residential Outside	Parcel	LLV

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Step 9: The carrier walks to the second residence to deliver the parcel.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	K10
On Route	N/A	Park & Loop	Residential Outside	Parcel	Walking Flat

Step 10: The carrier delivers the parcel.

This would be *Load* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	H10
Point of Delivery	N/A	Park & Loop	Residential Outside	Parcel	Drop to Customer

Step 11: The carrier walks to the vehicle from the second residence.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K10
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	Walking Flat

Step 12: The carrier drives to the next loop to continue deliveries.

This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

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(a) (i) Yes, this is the typical process, unless the carriers can take the parcels with them as they start the loop delivery process

(b) Yes, this is the typical process unless size or weight impact the delivery process.

(c) This is the typical process unless size and weight impact the delivery process.

(d) The following are typical circumstances under which the carrier would not be likely to follow the sequence in (a):

- 1. The parcel to be delivered is to the first delivery point on the park & loop and is of a size and weight the carrier can take it along with the delivery of the non-parcel mail.**
- 2. The residence for the parcel delivery is a few delivery points into the loop sequence so the carrier adjusts the park point to in front of the delivery point. The carrier will walk to the first delivery point and deliver the loop sequence. As the carrier is walking to the delivery point requiring the parcel the carrier will stop by the vehicle and obtain the parcel, and take it along with the non-parcel mail.**
- 3. Customers meet the carrier at their vehicle to obtain their parcels.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-5. Consider the following factual scenario. A carrier on a park and loop route has completed collection, delivery, and accountable activities on the loop for "non-parcel" mail. The carrier has two "parcels" in the Long Life Vehicle (LLV) that remain to be delivered to two different addresses on the loop. Suppose that the carrier has completed delivery of the first parcel and the carrier's activity is sampled while driving the LLV to the second parcel stop.

(a) In a manner similar to the examples that are provided in pages 11-12 of your testimony, describe how this driving activity should be recorded in the Engineered Standards database.

(b) Do the Engineered Standards data collection instructions recognize that driving activities may be performed solely in support of a particular product or service or group of products or services? If so, how is a driving activity associated with a specific product or service or group of products or services in the Engineered Standards data?

(c) Provide by product or service all data related to instances where driving activities are performed solely in support of a particular product or service or group of products or services.

(d) Confirm that it is standard practice for a letter carrier on a park and loop route to deliver parcels only after all non-parcel mail is delivered on the loop.

RESPONSE:

(a) This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

(b) NO.

(c) There is no work sampling data to supply this information.

(d) Yes, this is the typical process, unless the carriers can take the parcels with them.

DECLARATION

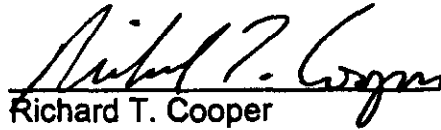
I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 2-17-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
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February 17, 2000