

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001**

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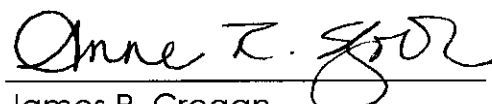
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Docket No. R2000-1

**FIRST SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
TO USPS WITNESS RAYMOND
(MPA/USPS-T13-1-56)**

(February 17, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of American hereby submits the attached interrogatories to USPS Witness Raymond (MPA/USPS-T13-1-56).

Respectfully submitted,



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**FIRST SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
TO UNITED STATES POSTAL SERVICE WITNESS RAYMOND**

MPA/USPS-T13-1. Please identify the date on which you were made aware that the USPS might use the ES data in its calculation of postal rates. Identify what knowledge you had on that date of the Street-Time Survey, the Foot Access Test, the Curbline Access Test, and the Load Time Variability Test.

MPA/USPS-T13-2. Did the fact that the USPS might use the ES data for rate making affect in any way the design of the ES data collection? If so, how?

MPA/USPS-T13-3. Are you aware of the recommendations of the Data Quality Study with regard to the use of the route measurement data from the Delivery Redesign project? If so, state your understanding of these recommendations.

MPA/USPS-T13-4. Please indicate the number of times that you met with USPS Witness Baron with regard to preparation of R2000-1, and state the purpose of each such meeting. Provide any and all records of these meetings, including, but not limited to, notes, correspondence and memoranda.

MPA/USPS-T13-5. Please refer to page 4, lines 34-35 of your testimony, at which you describe Appendix E, Form 3999x, as being "used to prepare the database for Foster Associates Inc." Please describe how this form was used.

MPA/USPS-T13-6. Please refer to page 5, line 4, of your testimony, at which you describe the objective of Engineered Standards study as: "to develop engineered methods and time standards." Were all the methods and time standards developed by the study actually based solely on the activity sampling exercises performed? If not, please describe all other techniques used?

MPA/USPS-T13-7. Please provide a copy of the methods analysis and time values for standards developed during the study described in your testimony at page 5, lines 3-5, and indicate which method(s) was/were used to determine them.

MPA/USPS-T13-8. Please identify the primary focus of the Engineered Standards study. Please state whether that focus was to observe all the different activities that letter carriers are required to perform. Please state how your program of observations was organized to achieve this.

MPA/USPS-T13-9. Please refer to your Testimony, at page 5, lines 14-15, at which you state: "The data collection needed to be comprehensive in order to support in-depth analysis and validation of work methods." Please describe the ways in which your study was "comprehensive," what analysis was performed, and how work methods were validated.

MPA/USPS-T13-10. Please refer to your Testimony at page 6, lines 16-17, describing two-person teams. Please describe the activities performed by each member of the two-person data collection team during a complete shift. Please describe how breaks were accommodated, the frequency that roles were reversed, any counting or methods observations that were taking place concurrently, and any data capture that is not reflected in the Library Reference: Engineering Standards Database.

MPA/USPS-T13-11. Please refer to your Testimony at page 6, lines 17-18. Please describe how and why six minutes was chosen as the observation interval.

MPA/USPS-T13-12. Please refer to your Testimony at page 6, lines 20-22, at which you indicate that the pilot study developed a report showing the percentage breakdown of the various activities based on the work sampling. Please provide a copy of that report.

MPA/USPS-T13-13. Please refer to your Testimony at page 7, footnote 3, in which you describe the technique used to ensure random selection of routes. Please describe the purpose of randomly selecting routes within a station?

MPA/USPS-T13-14. Please identify any data used by you during the preparation of your Testimony that was not collected by a full-time employee of Resource & Process Metrics, Inc. As to all such data, please identify the individuals who performed the collection. As to any such individuals, please specify the company or organization that they are affiliated with (including the USPS, if applicable) and describe what methods you used to ensure the validity of their data.

MPA/USPS-T13-15. Please refer to your Testimony at page 7, lines 12-14, at which you describe the two phases of data collection performed. As to this data collection, please explain how data collectors were selected and trained. Please provide copies of all training materials and manuals. Please indicate any and all differences between the training process used for Phase 1 and that used for Phase 2.

MPA/USPS-T13-16. Please identify individuals who served as data collectors for Phase 1 and Phase 2, described in your Testimony at pages 7-8. (In lieu of names, you may use codes to differentiate these individuals). As to each such individual, please identify the routes worked during Phase 1 and Phase 2.

MPA/USPS-T13-17. Please provide all work plans, data collection sheets, approach/methods, and process review documents or reports prepared for, or in connection with, both Phase 1 and Phase 2.

MPA/USPS-T13-18. On page 14 of your Testimony, you state that during Phase 2, 234 routes were observed at 22 locations. However, on page 8 of your Testimony, you state that ten "sites" were selected as potential implementation test sites and Delivery Redesign reduced the number of implementation test sites to five. Please explain the difference between "locations" and "sites."

MPA/USPS-T13-19. Please refer to your Testimony at page 8, lines 12-14, at which you describe the selection of Phase 2 sites. Please provide copies of all requests and other materials provided to the regions, with respect to site selection for both Phase 1 and Phase 2.

MPA/USPS-T13-20. Please describe all USPS documentation on the site, routes, carriers, etc., that was reviewed by your organization in connection with the selection of sites. Please describe the types of routine and/or typical discussions with postmasters, supervisors, and carriers that were undertaken by your organization in connection with the selection of sites. If these differed between Phase 1 and Phase 2, please explain the differences.

MPA/USPS-T13-21. Please describe any and all instances in which the methods used in, and/or results achieved by Phase 1, caused any revisions in sampling, testing, or data processing in Phase 2. Include in this description an explanation of the extent to which the Phase 1 results were discussed with the USPS, any of its contractors, or any labor organizations, and how these discussions affected any identified revisions.

MPA/USPS-T13-22. Please refer to your Testimony at page 35, numbered paragraph 1, at section 11.3. During Phase 1 and Phase 2, how did you determine the specific point at which the outside activities of letter carriers began and ended? If more than one option was provided, please indicate how observers were instructed to choose between the options.

MPA/USPS-T13-23. During Phase 1 and Phase 2, how was downtime at the end of a shift -- for example, after all deliveries had been completed but before the letter carrier clocked-out -- recorded?

MPA/USPS-T13-24. Please identify all sites that were used in both Phase 1 and Phase 2, and explain why each was used for both phases.

MPA/USPS-T13-25. As to sites selected for Phase 1, please state why some sites were selected by the regions and others were selected randomly.

MPA/USPS-T13-26. Please refer to your Testimony, at page 14, lines 4-5, at which you state that, during phase 1, 106 routes were observed at 32 locations. Please provide for each CY code: the region and whether the site was chosen by the region or randomly selected.

MPA/USPS-T13-27. During Phase 1, was any location that was originally chosen either by the region or by random selection ultimately unobserved? If so, please identify the site and explain why it was not observed.

MPA/USPS-T13-28. Was any Phase 1 site observed for more than one workday? If so, please identify the site and explain why it was observed for a greater length of time.

MPA/USPS-T13-29. Was any Phase 1 site observed for less than one workday? If so, please identify the site and explain why it was observed for a lesser length of time.

MPA/USPS-T13-30. What was the ES study purpose behind the decision to employ single-day observations in Phase 1 and multiple-day observations in Phase 2?

MPA/USPS-T13-31. Please refer to your Testimony at page 8, line 14. Please define the term "Engineered Standard Implementation test site."

MPA/USPS-T13-32. Please refer to your Testimony at page 8, line 12. Please describe how and why you determined the number of days a "multiple-day" study should take, and how many days comprised a "multiple-day" study.

MPA/USPS-T13-33. With regard to Phase 2, please provide for each CY code: the region, and whether it was chosen by the region or randomly selected.

MPA/USPS-T13-34. During Phase 2, was any location that was originally chosen either by the region or by random selection ultimately unobserved? If so, please identify the site and explain why it was not observed.

MPA/USPS-T13-35. During Phase 2, was any location that was originally chosen either by the region or by random selection ultimately unobserved? If so, please identify the site and explain why it was not observed.

MPA/USPS-T13-36. Please refer to your Testimony, at page 11, lines 21 - 22, and levels 11.4 and 11.4.1. Please define the terms "Finger @ Delivery" and "1-Handed Slam." Please state whether it is possible to conduct a 1-Handed Slam while fingering the mail. Please explain how a 1-Handed Slam and fingering the mail at delivery are associated with reaching into the satchel to retrieve mail.

MPA/USPS-T13-37. Please state what proportion of the routes observed were being delivered by the regular letter carrier?

MPA/USPS-T13-38. Please refer to your Testimony at Appendix C. Were the barcodes presented to the data collectors working on the study as they are presented in Appendix C? If not, in what way were the presentations different? If numbers were not sequential, explain why they were presented in this fashion,

MPA/USPS-T13-39. Please refer to your Testimony at Appendix C. As to each of the following bar codes, please provide a more detailed description and explanation as to what was being observed:

- (a) L12 Point of Delivery
- (b) L13 On Route
- (c) L15 Miscellaneous

MPA/USPS-T13-40. Please state the procedure used by data collectors when the wrong barcode was accidentally scanned. How was this corrected?

MPA/USPS-T13-41. Please provide an example of a printed daily report for a specific observation.

MPA/USPS-T13-42. Please identify and provide all instructions and/or materials given to data collectors working on the study regarding how they were to review the accuracy of their scans.

MPA/USPS-T13-43. Please refer to your Testimony at page 13, line 6, at which you refer to "manual entries." Please state what entries were made manually.

MPA/USPS-T13-44. Please state whether it is physically possible for a data collector to change data before sending it to the central database manager.

MPA/USPS-T13-45. Please state whether records were maintained as to changes in data that were made or requested to be made. Please provide any such records.

MPA/USPS-T13-46. Please state whether records were maintained as to changes to data that were made as a result of review or oversight. Please provide any such records.

MPA/USPS-T13-47. Please state whether records were maintained as to changes to data that were made as a result of identification of illogical sequences. Please provide any such records.

MPA/USPS-T13-48. Please state whether any records made during the course of the study were purged from the data set. Please state how many records were purged from the data set.

MPA/USPS-T13-49. Please state whether instructions, manuals, training materials or the like were provided to central database managers concerning reviewing for accuracy, making corrections, and setting-up and/or maintaining databases. Please provide any such instructions, manuals, training materials, or the like, or describe how training in these areas was otherwise provided. Please provide examples of the daily reports reviewed by the database manager.

MPA/USPS-T13-50. Were records maintained of changes to the data set that were requested but were not made? If so, please provide.

MPA/USPS-T13-51. Please refer to your Testimony at page 13, line 15. Please provide a definition for the term "outlier."

MPA/USPS-T13-52. In allocating the ES data to the STS categories were any problems experienced? If so, please explain what these problems were and how they were resolved.

MPA/USPS-T13-53. Identify any and all USPS employee(s), contractor(s) and/or representative(s) with whom you had any discussions regarding the allocation of the ES data to STS categories. As to each such individual, state the substance of any such discussion.

MPA/USPS-T13-54. Please refer to your Testimony at page 14, lines 9-10, at which you state that "carrier activity information collected during the ES study was classified according to the STS definitions for carrier activities. Please identify the source of the STS definitions, as well as copies of the definitions.

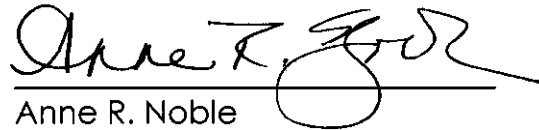
MPA/USPS-T13-55. As to each route code, please provide the following:

- (a) the delivery type;
- (b) the delivery type status;
- (c) the possible delivery points by type and type status; and
- (d) the actual deliveries made by type and type status.

MPA/USPS-T13-56. As to each route/day, please provide the total time and total tallies collected.

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 the Commission's Rules of Practice.


Anne R. Noble

Washington, D.C.
February 17, 2000