

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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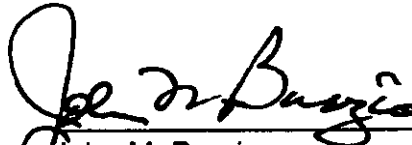
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
LLOYD RAYMOND (ADVO/USPS-T13-1-23)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Lloyd Raymond. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,



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CERTIFICATE OF SERVICE

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


Thomas W. McLaughlin

February 22, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS LLOYD RAYMOND

ADVO/USPS-T13-1. On page 5 of your testimony, you state:

"The objective of the Engineered Standards was to collect actual activities of the city letter carrier and to develop engineered methods and time standards to establish a workload managing system. . . . The data collected needed to be comprehensive in order to support in-depth analysis and validation of work methods."

- (a) From the data presented in your testimony, were engineered methods and time standards developed to establish a workload managing system? Please explain and describe how the data were used in these capacities.
- (b) Were the data presented in your testimony used to support any in-depth analyses or validations of work methods? Please explain and describe how the data were used in these capacities.

ADVO/USPS-T13-2. With respect to the specific project which generated the data presented in your testimony, please provide the following:

- (a) A full description of your original work plan proposed to the USPS for each contract you performed on this specific project.
- (b) The statement of work and list of deliverables for each contract you performed on this specific project.
- (c) List of reports, analyses, and all other documentation you prepared on each contract you performed on this specific project.
- (d) Contract initiation and completion dates for each contract you performed on this specific project.

ADVO/USPS-T13-3. With respect to specific project which generated the data presented in your testimony, please provide all USPS written guidance and describe all discussions with the USPS concerning

- (a) the selection of specific locations and routes for observation.
- (b) the observation approach, activities to be recorded, and the criteria for the data collection for this project.
- (c) data processing and quality assurance procedures.

ADVO/USPS-T13-4. What documentation did you review or assess on either sites, locations or routes prior to the selection process?

ADVO/USPS-T13-5. What documentation did you review or assess on either sites, locations or routes once the sites/locations were selected?

ADVO/USPS-T13-6. Were any of the data included within your project data (the Engineered Standards/Delivery Redesign project, described on page 3 of your testimony) collected by USPS employees or other contractors (rather than your own organization)? If so, please:

- (a) Identify and describe such data.
- (b) Identify the types of USPS employees/contractors that provided the data.
- (c) Describe how you validated that data.

ADVO/USPS-T13-7. On page 14 of your testimony, you state that during Phase 1, 106 routes were observed at 32 locations.

- (a) Please identify the 32 locations in Phase 1 and identify the USPS Regions in which they are located.

- (b) Which locations were chosen by USPS Region personnel which were chosen by the random-number selection?
- (c) Were there any locations initially chosen by either USPS Region personnel or the random-number selection that ultimately were not observed? If so, please provide the number of such locations and explain why they were not observed.
- (d) Were there any routes initially chosen by the random-number selection that were not observed? If so, please provide the number of such locations and explain why they were not observed.
- (e) Were any observed routes chosen by other than the random-number selection process? If so, please identify them and explain why they were chosen.

ADVO/USPS-T13-8. You state that Engineering sent requests to the ten geographic USPS Regions asking that each Region select 3 to 5 sites (zip codes). Please provide a copy of those requests, and any other guidance that was provided to the Regions, with respect to making choices of sites. If any of the guidance was oral in nature, please also describe it.

ADVO/USPS-T13-9. On page 14 of your testimony, you state that 234 routes were observed at 22 locations during Phase 2. On page 8 you state that ten "sites" were selected as potential implementation test sites, which Delivery Redesign reduced to five implementation test-sites. On page 9 (footnote 8), you also state that two sites from Phase 1 were also observed. Please identify the number of sites/locations in Phase 2 that were chosen from

- (a) the Phase 2 requests to the ten geographic Regions,
- (b) the Phase 1 requests, and

- (c) the Phase 1 "random" selection.

ADVO/USPS-T13-10. For the Phase 2 locations,

- (a) Please identify the 21 locations in Phase 2 and identify the USPS Regions in which they are located.
- (b) Which locations were chosen by the Regions and which were chosen by the random-number selection?
- (c) Were there any locations initially chosen by either the Regions or the random-number selection that were not observed? If so, please quantify and explain why.
- (d) Were there any routes initially chosen by the random-number selection that were not observed? If so, please explain why they were not observed.
- (e) Were any observed routes chosen by other than the random-number selection process? If so, please identify them and explain why they were chosen.

ADVO/USPS-T13-11. On page 6 of your testimony, you state that it was determined that two-person teams would be required to collect the work sampling data.

- (a) Please explain why two data collectors were required to sample each route-day.
- (b) Please describe what each data collector did during the data collection process.
- (c) Please identify any route-day where there was only one data collector.
- (d) Please identify any route-day where there were more than two data collectors.

ADVO/USPS-T13-12. With respect to the Videx TimeWand II Barcode Scanners,

- (a) Please provide all documentation available on how to use the equipment.
- (b) When the six-minute interval tone is programmed, is there a limitation on when data must first be entered? Is there a limitation on how long it takes to complete an observation?
- (c) Is it possible to make corrections to one or more entries on the scanner during the observation?
- (d) Do the scanners automatically time and date each observation?
- (e) Do the scanners maintain the time sequencing of the observations?

ADVO/USPS-T13-13. On page 13 of your testimony, you state that:

"Data collectors printed daily reports which the team reviewed for accuracy of scans and manual entries. Changes were not made on site; any changes to the data were noted and forwarded to the central database managers. After being reviewed, the data was uploaded to a central database."

- (a) Please provide all written instructions and criteria given the data collectors on how they were to review for accuracy of scans and manual entries.
- (b) Were there supervisory individuals on site/location who reviewed the accuracy of scans and manual entries? If so, provide all written instructions and criteria given to those individuals on how they were to review for accuracy.
- (c) With respect to the forwarded changes from on-site, please quantify the following:
 - (1) The number of route-days which were noted as requiring some change.

- (2) The number of individual observations by route-day which were noted as requiring some change.
- (d) Please provide a list of all the types of changes that were forwarded.

ADVO/USPS-T13-14. With respect to the central database managers for this project, please provide:

- (a) copies of all training and instruction manuals.
- (b) a description of the training of the central database managers, and
- (c) an explanation of how the database managers ran and reviewed the daily reports.

ADVO/USPS-T13-15. With respect to the changes made by the central database managers:

- (a) Were there occasions when the changes forwarded from the site were not implemented by the database managers? Please explain and quantify by route-day.
- (b) Were there occasions when the database managers made changes which were different from those forwarded from the site? Please explain and quantify.
- (c) Please provide a list of all the types of errors identified by the database managers. If they can be quantified by type, please do so.
- (d) When these types of errors were resolved, please explain generally how they were resolved.
- (e) Please describe the types of "outliers" that were investigated.

ADVO/USPS-T13-16. With respect to errors that were purged from the data set:

- (a) Please provide a list of all the types of errors that were purged and how your organization attempted to resolve them before purging them. If they can be quantified by type, please do so.
- (b) When there was an unresolved apparent error in only one or a small grouping of observations, were only those observations (tallies) eliminated or was the entire route-day eliminated? Please explain.
- (c) Please quantify the number of full route-days that were purged.
- (d) Please quantify the number of observations (tallies) that were purged on route-days that remained in the database.
- (e) Please quantify the number of route-days for which only some observations (tallies) were purged.

ADVO/USPS-T13-17. For each route code, from the data you collected on location, please provide the number of possible:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Number of residential centralized deliveries
- (d) Number of other residential deliveries
- (e) Number of business curb deliveries
- (f) Number of business NDCBU deliveries
- (g) Number of business centralized deliveries
- (h) Number of other business deliveries.

ADVO/USPS-T13-18. For each route/day, from the data you collected on location, please provide the number of actual deliveries made. If possible separate them by type:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Number of residential centralized deliveries

- (d) Number of other residential deliveries
- (e) Number of business curb deliveries
- (f) Number of business NDCBU deliveries
- (g) Number of business centralized deliveries
- (h) Number of other business deliveries.

ADVO/USPS-T13-19. With respect to the use of the Engineered Standards data for "support/update" of the Street-Time Survey (STS):

- (a) When were you first advised that data from the Engineered Standards data collection might be used for postal rate case costing purposes as a "support/update" for the Street-Time Survey (STS)?
- (b) Please identify all the USPS and USPS contractor representatives with whom you discussed the use of the ES data for support/update of the STS, and when you first discussed it with them.
- (c) Please provide copies of all requests, proposals, instructions and correspondence with the USPS and/or USPS contractor representatives relating to such use of the ES data.
- (d) Did you review any documentation for the Street-Time Survey? If so, what STS documentation did you review, and when did you review it?
- (e) Did you review any documentation on the Foot Access Test, the Curblin Access Test, or the Load Time Variability Test? If so, what documentation did you review, and when did you review it?

ADVO/USPS-T13-20. Did the USPS or any USPS contractor provide any written or oral guidance or assistance on how to translate the individual observations/tallies in your data into the six STS categories? If so, please identify those individuals, provide copies of any written guidance or assistance, and describe any oral guidance or assistance.

ADVO/USPS-T13-21. Please explain how the out-of-office observations were initiated and ended.

- (a) Did the data collectors identify the check-out time when carriers left for the street or the check-in time when they returned to the office?
- (b) For any one route, at what points were the Videx TimeWand II Barcode Scanners initiated to start counting six minute intervals at the beginning of out-of-office time and for the end of lunch break? Did this vary by route?
- (c) For any one route, at what points were the scanner stopped for lunch break and for the end of out-of-office time?

ADVO/USPS-T213-22. On page 14 of your testimony, you state:

"The scan sequence for each line of the database was reviewed and one of the STS categories was entered. . . To crosscheck the manual review process, a master list of scan sequences were grouped according to STS activity. All scan-sequence possibilities for an STS activity were assigned a 1-6 code. An update query was then used to assign the sequences a code in the database. These codes appear in the Library Reference USPS-LR-I-163 with the column header "STS Type."

- (a) Was the initial assignment to STS category done manually? If so, who was responsible for the assignment and at what point in the processing was it done?
- (b) On page 14, you state that the column "STS Type" contains the definitions entered by manual sequence review, but on page 15 you state that this column contains the numeric codes assigned by the master list. Please explain.
- (c) How was the master list used to crosscheck the manual sequence review?
- (d) Please provide the master list of scan sequences.

ADVO/USPS-T13-23. Please provide the following information with respect to the sample survey that generated the data presented in your testimony and used by USPS witness Baron:

- (a) the "definition of the universe under study, the sampling frame and units, and the validity and confidence limits that can be placed on major estimates," as required by Rule 31(k)(2)(ii) of the Commission's Rules of Practice.
- (b) a description of all sampling and statistical tests performed with respect to the data collection.
- (c) the results of all such sampling and statistical tests.