

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2000

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DOCKET NO. R2000-1

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MOTION OF UNITED PARCEL SERVICE  
TO COMPEL ANSWERS TO INTERROGATORIES  
UPS/USPS-T13-1 AND 2 TO WITNESS RAYMOND  
(February 28, 2000)

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Pursuant to Sections 26(d) and 27(d) of the Commission's Rules of Practice, United Parcel Service ("UPS") hereby moves the Presiding Officer to order the United States Postal Service ("Postal Service") to answer interrogatories UPS/USPS-T13-1 and 2, filed on February 3, 2000, and to produce the documents requested therein. The Postal Service filed objections to these interrogatories on February 14, 2000. A copy of the interrogatories is attached hereto as Exhibit "A."

**THE DISCOVERY REQUESTS**

Interrogatory UPS/USPS-T13-1 requests copies of "the final report and all interim reports regarding carrier activities developed as a result of the Engineered Standards/Delivery Redesign project" referred to in witness Raymond's testimony. See Direct Testimony of Lloyd Raymond on Behalf of the United States Postal Service, USPS-T-13. Pursuant to discussions between the parties, UPS has limited its request to the final report (or the latest report, if a final report has not yet been produced). The Postal Service objects to the production of these documents on the basis that they may contain facility specific information that might compromise the Postal Service's business

interests. The Postal Service also claims that disclosure of this information might adversely affect its negotiations with labor unions.

Interrogatory UPS/USPS-T13-2 asks for information regarding the use of the time standards developed as a result of the Engineered Standards project, an explanation of how the time standards are used, the time standards that have been developed, and the time standards currently in use. The Postal Service objects to this interrogatory on the basis that it requests confidential information the disclosure of which could adversely affect the Postal Service's bargaining position in its negotiations with postal labor unions.

### **ARGUMENT**

Despite discussions between the parties, the Postal Service has not yet provided specific descriptions of the reports requested in UPS/USPS-T13-1 which it is attempting to protect. UPS acknowledges that the requested information may arguably have some impact on the Postal Service's negotiations with its labor unions. Nevertheless, this information is highly relevant to the issues in this case. Cost analysis should follow the underlying operational processes, and therefore an operational view of carrier activities is essential. Specifically, an operational view of the time required to complete the various carrier activities goes to the heart of analyzing the costs of those activities. This is evidenced by the Postal Service's express reliance on this information in the Postal Service's testimony. It therefore should be provided.

In order to accommodate the Postal Service's confidentiality concerns, UPS is willing to accept the information requested in both interrogatories under the protective conditions which the Presiding Officer ultimately determines to be appropriate in

connection with the Motion of United States Postal Service for Waiver and for Protective Conditions for Analysis of Witness Yezer (January 12, 2000) ("Yezer Motion"). UPS suggests that the conditions proposed by the Postal Service be adopted on an interim basis, with those conditions automatically modified to be consistent with the Presiding Officer's decision on the Yezer Motion.

The Postal Service also objects to UPS/USPS-T13-2. Interrogatory UPS/USPS-T13-2(a) asks for a description of the purpose of the time standards. The Postal Service provides no support for its claim that the purpose of the time standards is confidential. Similarly, an explanation of how the time standards are used by the Postal Service, requested in interrogatory UPS/USPS-T13-2(c), does not seem to be confidential or commercially sensitive in any way.

UPS understands that the actual standards, requested in interrogatory UPS/USPS-T13-2(b) and (d), may be sensitive in that the Postal Service claims to use them in negotiating with its labor unions. Therefore, UPS agrees to accept this information subject to appropriate protective conditions, as discussed above.

WHEREFORE, United Parcel Service respectfully requests the Presiding Officer to (1) overrule the Objection of United States Postal Service to UPS interrogatories UPS/USPS-T13-1 and 2; (2) order the United States Postal Service to answer interrogatories UPS/USPS-T13-2(a) and (c); and (3) order the Postal Service to provide the final report (or the latest report) requested in interrogatory UPS/USPS-T13-1 and the information requested in interrogatories UPS/USPS-T13-2(b) and (d), subject, on an interim basis, to the protective conditions proposed by the Postal Service in connection

with witness Yezer's testimony, with those conditions automatically modified to be identical to those finally adopted with respect to witness Yezer's testimony.

Respectfully submitted,



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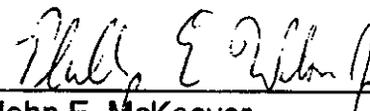
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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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FIRST SET OF INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS RAYMOND  
(UPS/USPS-T13-1 through 5)  
(February 3, 2000)  
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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Raymond (UPS/USPS-T13-1 through 5).

Respectfully submitted,



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Of Counsel.

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

UPS/USPS-T13-1. Refer to page 5 of your testimony, where you state that the purposes of the Engineered Standards/Delivery Redesign project were to develop engineered methods and time standards for city carrier activities, to analyze and validate city carrier work methods, and to provide activity frequency information to determine the portion of time carriers spend doing these activities. Please provide copies of the final report and all interim reports regarding carrier activities developed as a result of the Engineered Standards/Delivery Redesign project.

UPS/USPS-T13-2. You state in your testimony that "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." USPS-T-13, at 5.

- (a) What is the purpose of the time standards to which you refer?
- (b) Provide the time standards for carrier activities that resulted from the Engineered Standards/Delivery Redesign project. If final standards have not been prepared, provide any interim standards that have been developed.
- (c) Explain how these time standards are used by the Postal Service.
- (d) If final or interim time standards resulting from the project have not been adopted, provide the standards currently being used.

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.

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

(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.

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.

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

- 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.

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

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

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.

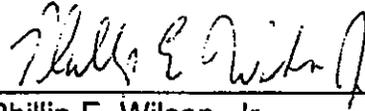
(b) Do the Engineered Standards data collection instructions recognize that driving activities may be performed solely in support of a particular product or service or group of products or services? If so, how is a driving activity associated with a specific product or service or group of products or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

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



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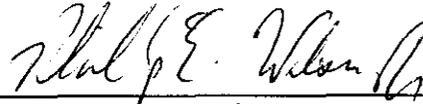
Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: February 3, 2000  
Philadelphia, Pa.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



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Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: February 28, 2000  
Philadelphia, Pa.