

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 MPA INTERROGATORIES
(MPA/USPS-T13-1-5, 8, 9, 11, 13, 15, 16, 18, 20-44, 48, 49, 51-55)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T13-1-5, 8, 9, 11, 13, 15, 16, 18, 20-44, 48, 49, 51-55, filed on February 17, 2000. Objections were filed to interrogatories MPA/USPS-T13-6, 7, 10, 12, 14, 17, 19, 45-47, 50, and 56.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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March 2, 2000

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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 Curblin Access Test, and the Load Time Variability Test.

RESPONSE:

Some time in the August – September 1999 time frame I became aware of Postal Service interest in the ES data for possible use in a rate case. I had no knowledge of the Street-Time Survey prior to meeting with members of Foster Associates, Incorporated and with witness Stevens.

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MPAIUSPS-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?

RESPONSE:

No.

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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.

RESPONSE:

No, I am not aware of the recommendations of the Data Quality Study.

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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.

RESPONSE:

I do not remember how many times I met with witness Baron. I did not make any notes or develop any records of the meetings with Witness Baron.

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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.

RESPONSE:

The route totals at the bottom of the final page of a 3999x data set were used in the early steps with Foster Associates Inc. to classify routes as Park & Loop, Curbline, Mixed Business. This classification was not necessary and we dropped the route classification data from the information given to Foster Associates Inc.

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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.

RESPONSE:

There were three major areas of focus and they were progressive. The first area of focus was to collect data on the actual activities being performed by carriers along with criteria that might be effecting their activities. The second area of focus was the development of the methods, time standards, and the time standards application technique/workload managing system. The third area of focus was the implementation of the methods, time standards, route adjustment process, workload managing system, and analysis of the results of implementation at four test sites.

Yes, we were interested in observing all the work activities performed by carriers.

Our observations of the route began before the carrier arrived and finished upon completion of the route. Work sampling began upon carrier clocking in and finished upon the carrier clocking out. In addition to the work sampling, time studies, videotape, and other quantitative data were collected throughout the day.

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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.

RESPONSE:

Work sampling, time studies, videotape, and other quantitative data were collected throughout the day. A predetermined time system was applied to the activities performed and used information from the data collected. This approach provided written methods descriptions and generated the standard time for each activity. *These activity/methods descriptions and times were reviewed by the Postal Subject Matter Expert, and other team members during the development of the application system. The videotape served as a platform for review of the methods being used, as a way to validate methods, and as a time study technique. Frame- by-frame data were extracted and these actual times were compared to the time projected by the application of the methods developed and predetermined time measurement systems.*

Analysis were performed on the data collected. We analyzed volume data, time data extracted from the videotapes, route data, and the effects of the quantitative data.

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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.

RESPONSE:

An observation made every six minutes would give 10 observations per hour which would make it easy for anyone to relate to a percentage of time spent performing a task or time spent at a location during the work hours of a day.

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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?

RESPONSE:

We wanted to minimize the potential impact Postal Service management, the carrier and/or the Union might have on the routes being studied. We had also been advised the data may be used to support negotiations and/or possible arbitration and we wanted to reduce any bias that could be introduced by teams picking specific types of routes.

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MPA/USPS-TI3-15. 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.

RESPONSE:

Phase 1 data collectors were either assigned by their respective companies or independent contractors that I was aware of from previous consulting jobs.

Phase 2 data collectors were contractors from Phase 1, contractors hired through A. T. Kearney, and contractors brought on board by Resource & Process Metrics, Inc.

The data collectors in Phase 1 participated in the inventory of the carrier tasks, assisted with development of the data collection approach, and participated in the pilot study to perfect the data collection approach. During Phase 2 new data collectors were placed with Phase 1 data collectors to receive on the job instruction as to the data requirements and techniques used. They also received on the job instruction from Postal Subject Matter Experts. In Phase 2, there were three Phase 1 collectors teamed with six new collectors for 3 weeks for on the job instruction, then these nine were teamed with 18 additional collectors for 2 weeks for on the job instruction. Then the three collectors from Phase 1 formed the Quality Control – rovers, and twelve 2-person teams formed the collection group.

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Team members reviewed a book of Postal Forms carriers may fill out, pictures of Postal equipment and mailboxes/drops, and a book of bar codes. The experienced contractors and Postal Subject Matter experts worked with the contractors.

Any additional Phase 2 contractors were placed with the two person teams and received on the job instruction and instruction from a Postal Service Subject Matter Expert.

ES materials used in support of on the job instruction: a book of forms/pictures developed and used by the Postal Subject Matter Expert, and the bar code book developed in Phase 1. Engineered Standards Book of Forms/Pictures Library Reference USPS-LR-I-220 and Engineered Standards Book of Bar Codes Library Reference USPS-LR-I-221. These library references will be filed shortly.

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MPA/USPS-TI3-16. 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.

RESPONSE:

Code	Phase 1	Phase2
OBS02	X	
OBS04	X	
OBS05	X	
OBS06	X	
OBS07	X	
OBS08	X	X
OBS09		X
OBS10		X
OBS12	X	X
OBS13	X	X
OBS14		X
OBS15		X
OBS16		X
OBS17		X
OBS18		X
OBS19		X
OBS20		X
OBS21		X
OBS22		X
OBS23		X
OBS24		X
OBS25		X
OBS26		X
OBS27		X
OBS28		X
OBS29		X
OBS30		X
OBS31		X
OBS32		X
OBS33		X
OBS35		X
OBS36		X
OBS37		X
OBS38		X
OBS39		X
OBS40		X
OBS42		X
OBS43		X

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OBS45		X
OBS46		X
OBS47		X
OBS48		X
OBS49		X
OBS50		X
OBS51		X
OBS52		X
OBS53		X
OBS54		X
OBS55		X
OBS56		X
OBS57		X
OBS58		X

Phase 1 Observer and Routes

ObserverCode	RoutNumberCode
OBS02	1908
OBS02	1928
OBS02	1970
OBS02	2822
OBS02	2835
OBS02	2947
OBS02	4846
OBS02	4876
OBS02	7519
OBS02	8035
OBS02	8045
OBS02	9303
OBS04	0610
OBS04	0626
OBS04	1560
OBS04	1569
OBS04	1595
OBS04	1612
OBS04	1842
OBS04	2912
OBS04	2947
OBS04	3507
OBS04	3522
OBS04	3543
OBS04	3549
OBS04	3618
OBS04	3656
OBS04	4114
OBS04	4126
OBS04	4214

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OBS04	4219
OBS04	4242
OBS04	4310
OBS04	4445
OBS04	8044
OBS04	8229
OBS05	3705
OBS06	1618
OBS06	1906
OBS06	1926
OBS06	2806
OBS06	2814
OBS06	2912
OBS06	2934
OBS06	3133
OBS06	3655
OBS06	4442
OBS06	4506
OBS06	4515
OBS06	4846
OBS06	4880
OBS06	5405
OBS06	5546
OBS06	8008
OBS06	8028
OBS06	8061
OBS06	9302
OBS06	9302
OBS07	0163
OBS07	0818
OBS07	0828
OBS07	0849
OBS07	0908
OBS07	1024
OBS07	1061
OBS07	1205
OBS07	1206
OBS07	1233
OBS07	1237
OBS07	1252
OBS07	1253
OBS07	1428
OBS07	1430
OBS07	1435
OBS07	1475
OBS07	1485
OBS07	1946
OBS07	2374
OBS07	2375

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OBS07	2385
OBS07	3104
OBS07	3125
OBS07	3141
OBS07	3703
OBS07	3703
OBS07	3704
OBS07	3705
OBS07	3705
OBS07	3707
OBS07	4708
OBS07	4712
OBS07	4719
OBS07	4725
OBS07	4726
OBS07	4731
OBS07	4732
OBS07	4732
OBS07	4811
OBS07	4811
OBS07	4814
OBS07	4817
OBS07	4910
OBS07	4918
OBS07	4921
OBS07	6703
OBS07	6739
OBS07	6742
OBS08	0628
OBS08	1558
OBS08	1560
OBS08	1569
OBS08	1595
OBS08	1595
OBS08	2934
OBS08	4104
OBS08	4106
OBS08	4111
OBS08	4114
OBS08	4214
OBS08	4219
OBS08	4223
OBS08	4227
OBS08	4242
OBS12	0211
OBS12	0222
OBS12	0310
OBS12	0321
OBS12	0326

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OBS12	0429
OBS12	0603
OBS12	0607
OBS12	1620
OBS12	2155
OBS12	2161
OBS12	2167
OBS12	2169
OBS12	2451
OBS12	2465
OBS12	2469
obs12	3705
obs12	3706
OBS12	5414
OBS12	5416
OBS12	5440
OBS12	5553
OBS12	6234
OBS12	6248
OBS12	8405
OBS13	0134
OBS13	0211
OBS13	0218
OBS13	0401
OBS13	0414
OBS13	0433
OBS13	0480
OBS13	0623
OBS13	1613
OBS13	1620
OBS13	1632
OBS13	1638
OBS13	2155
OBS13	2160
OBS13	2167
OBS13	2169
OBS13	2451
OBS13	2469
OBS13	3127
OBS13	5420
OBS13	5433
OBS13	5546
OBS13	5553
OBS13	5566
OBS13	5566
OBS13	6229
OBS13	6288
OBS13	8404
OBS13	8408

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Phase 2 Observer and Routes

ObserverCode	RoutNumberCode
OBS09	0102
OBS09	0105
OBS09	0114
OBS09	0130
OBS09	0249
OBS09	0252
OBS09	0254
OBS09	0376
OBS09	0380
OBS09	1132
OBS09	1133
OBS09	1142
OBS09	1145
OBS09	1148
OBS10	4225
OBS10	4239
OBS10	4254
OBS10	4910
OBS12	1148
OBS12	8711
OBS12	8735
OBS12	8747
OBS13	4214
OBS13	4235
OBS13	4241
OBS13	4909
OBS13	4917
OBS13	8701
OBS13	8702
OBS13	8726
OBS13	8735
OBS13	8736
OBS13	8744
OBS13	8759
OBS14	0815
OBS14	0820
OBS14	0822
OBS14	0823
OBS14	0825
OBS14	0828
OBS14	0830
OBS14	0832
OBS14	1579
OBS14	1581
OBS14	4234

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OBS14	4243
OBS14	4909
OBS15	0382
OBS15	1132
OBS15	1142
OBS15	1579
OBS15	1581
OBS15	2201
OBS15	2203
OBS15	2205
OBS15	2213
OBS15	2215
OBS15	4234
OBS15	4243
OBS16	0101
OBS16	0467
OBS16	0711
OBS16	0716
OBS16	1606
OBS16	4232
OBS16	4248
OBS16	4258
OBS16	4259
OBS16	4265
OBS16	4285
OBS16	4908
OBS16	4915
OBS16	4940
OBS16	4944
OBS17	0116
OBS17	0124
OBS17	0244
OBS17	0806
OBS17	0807
OBS17	0809
OBS17	0811
OBS17	0821
OBS17	0824
OBS17	0827
OBS17	0831
OBS17	4272
OBS17	8701
OBS17	8717
OBS17	8735
OBS17	8759
OBS18	0803
OBS18	0807
OBS18	0808
OBS18	0811

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OBS18	0816
OBS18	0819
OBS18	0824
OBS18	1401
OBS18	1457
OBS18	1579
OBS18	1581
OBS18	4234
OBS18	4243
OBS19	0146
OBS19	0164
OBS19	0406
OBS19	0424
OBS19	0825
OBS19	1101
OBS19	1131
OBS19	1901
OBS19	1929
OBS19	2214
OBS19	2219
OBS19	6156
OBS19	6410
OBS19	8744
OBS20	1411
OBS21	0105
OBS21	0337
OBS21	1111
OBS21	1121
OBS21	1913
OBS21	2215
OBS21	2227
OBS21	6157
OBS21	6419
OBS22	1411
OBS22	1475
OBS22	1507
OBS22	1508
OBS22	1586
OBS22	8744
OBS23	8717
OBS24	0101
OBS24	0716
OBS25	1132
OBS25	1133
OBS25	1145
OBS25	1148
OBS25	4230
OBS25	4234
OBS25	4254

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OBS25	4912
OBS25	4916
OBS25	4917
OBS25	4920
OBS25	4931
OBS26	8701
OBS26	8717
OBS28	0415
OBS28	0426
OBS28	0801
OBS28	0817
OBS28	0820
OBS28	0822
OBS28	0825
OBS28	0828
OBS28	0830
OBS28	1581
OBS28	2717
OBS28	4273
OBS28	4275
OBS29	0320
OBS29	1581
OBS29	2417
OBS29	3707
OBS29	3716
OBS29	4234
OBS29	4254
OBS29	8212
OBS29	8218
OBS30	0106
OBS30	0107
OBS30	0115
OBS30	0119
OBS30	0123
OBS30	0240
OBS30	0247
OBS30	0255
OBS30	0305
OBS30	0370
OBS30	0373
OBS30	0379
OBS30	0383
OBS30	1049
OBS30	1581
OBS30	2206
OBS30	2211
OBS30	2214
OBS30	2224
OBS30	2402

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OBS30	2407
OBS30	2411
OBS30	3704
OBS30	3709
OBS30	8217
OBS30	8221
OBS31	0374
OBS31	1142
OBS31	1507
OBS31	1579
OBS31	1581
OBS31	1586
OBS31	2207
OBS31	2219
OBS31	2221
OBS31	2225
OBS31	4234
OBS31	4243
OBS32	8701
OBS32	8717
OBS32	8729
OBS32	8735
OBS32	8739
OBS32	8744
OBS32	8759
OBS33	0102
OBS33	0411
OBS33	0432
OBS33	0711
OBS35	0120
OBS35	0378
OBS35	1411
OBS35	1475
OBS35	1507
OBS35	1508
OBS35	1586
OBS35	8714
OBS35	8727
OBS35	8744
OBS35	8756
OBS35	8759
OBS35	8770
OBS36	0105
OBS36	0337
OBS36	1101
OBS36	6156
OBS36	6410
OBS37	0146
OBS37	0164

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OBS37	0406
OBS37	0424
OBS37	1121
OBS37	1901
OBS37	1917
OBS37	1929
OBS37	2214
OBS37	2219
OBS37	4271
OBS37	4275
OBS37	6157
OBS37	6419
OBS38	0320
OBS38	0424
OBS38	0498
OBS38	0611
OBS38	0802
OBS38	1401
OBS38	1457
OBS38	2417
OBS38	3707
OBS38	3716
OBS38	4213
OBS38	4257
OBS38	4262
OBS38	4906
OBS38	4908
OBS38	4920
OBS38	4926
OBS38	4931
OBS38	4940
OBS38	4944
OBS38	8212
OBS38	8218
OBS39	0101
OBS39	0129
OBS39	1411
OBS39	1475
OBS39	1507
OBS39	1508
OBS39	1586
OBS40	0108
OBS40	0111
OBS40	0241
OBS40	0246
OBS40	0250
OBS40	0375
OBS40	0377
OBS40	1132

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OBS40	1133
OBS40	1142
OBS40	1145
OBS40	1148
OBS40	2202
OBS40	2210
OBS40	2212
OBS40	2216
OBS42	1579
OBS42	8701
OBS42	8717
OBS43	0305
OBS43	0405
OBS43	0424
OBS43	0474
OBS43	0498
OBS43	0611
OBS43	1049
OBS43	2402
OBS43	2407
OBS43	2411
OBS43	3704
OBS43	4906
OBS43	4908
OBS43	4909
OBS43	4910
OBS43	4915
OBS43	4917
OBS43	4926
OBS43	4940
OBS43	4945
OBS43	8217
OBS43	8221
OBS45	0415
OBS45	0426
OBS45	1148
OBS45	1579
OBS45	2227
OBS45	2717
OBS45	4234
OBS45	4254
OBS45	4273
OBS45	4909
OBS45	4945
OBS46	0243
OBS46	0256
OBS46	1411
OBS46	1508
OBS46	1579

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OBS46	4207
OBS46	4221
OBS46	4233
OBS46	4238
OBS46	4249
OBS46	4908
OBS46	4910
OBS46	8701
OBS46	8702
OBS46	8703
OBS46	8705
OBS46	8717
OBS46	8735
OBS46	8744
OBS46	8748
OBS46	8759
OBS47	0405
OBS47	0467
OBS47	0621
OBS47	1605
OBS47	1606
OBS48	0621
OBS48	1475
OBS48	1508
OBS48	1586
OBS48	1605
OBS48	4234
OBS48	4242
OBS48	4254
OBS48	4906
OBS48	4908
OBS49	1581
OBS49	8701
OBS49	8735
OBS50	1132
OBS50	1142
OBS50	1145
OBS50	1581
OBS50	4906
OBS50	4910
OBS50	4915
OBS50	4917
OBS50	4920
OBS50	4926
OBS53	0102
OBS53	0116
OBS53	0242
OBS53	8744
OBS53	8759

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OBS54	0106
OBS54	0111
OBS54	0112
OBS54	0117
OBS54	0128
OBS54	0131
OBS54	0244
OBS54	0251
OBS54	0281
OBS54	0384
OBS54	0827
OBS54	0831
OBS54	1507
OBS54	4234
OBS55	0103
OBS55	0110
OBS55	0126
OBS55	0245
OBS55	0248
OBS55	0253
OBS55	0254
OBS55	0257
OBS55	4254
OBS55	4940
OBS55	4944
OBS56	0104
OBS56	0113
OBS56	0372
OBS57	0256
OBS57	1475
OBS57	1579
OBS57	4222
OBS57	4225
OBS57	4229
OBS57	4910
OBS57	4920
OBS57	4944
OBS57	8701
OBS58	4219
OBS58	4228
OBS58	4237
OBS58	4945
OBS58	4999
OBS59	0110
OBS59	0130
OBS59	0371
OBS60	4211
OBS61	4211
OBS61	4218

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OBS61	4224
OBS61	4236
OBS61	4265
OBS61	4917

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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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."

RESPONSE:

Site and location mean the same.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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.

RESPONSE:

We used Excel® to generate a random number list for the Postal Service to use in the selection of the random sites. The Postal Service picked the sites in my presence from a listing of finance numbers.

Our organization had no types of routine and/or typical discussions with postmasters, supervisors, and carriers in connection with the selection of sites.

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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.

RESPONSE:

The work sampling, time study, and videotaping were not changed between the Phases. Additional bar codes were added for inputting quantitative data for electronic uploading of data that in Phase 1 was manually added to a database.

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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.

RESPONSE:

Outside activities began when the carrier clocked to the street or when the carrier walked by the clocking station with the mail on the way to load the vehicle. Outside activities ended when the carrier clocked back into the office after performing the street activities or when the carrier walked by the clocking station with the empty tubs/trays and mail collected on the way to put items away and/or perform other PM activities.

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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?

RESPONSE:

When the carrier clocked back in at the end of the day the remaining time was inside time.

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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.

RESPONSE:

CY02, CY04 were observed in Phase 1. They were also observed during Phase 2 because they had been selected as a potential implementation test sites.

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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.

RESPONSE:

We wanted to create a data set based on random selection to compare to the sites selected by the Postal Service to determine if bias had been introduced by their selection of the sites. This approach would reduce the potential effect of Postal Service management making the selections, and the possible effect of carrier and/or the Union might have on the routes being studied. We had also been advised the data may be used to support negotiations and/or possible arbitration and we wanted to reduce any bias that could be introduced. In my opinion, we achieved this goal.

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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.

RESPONSE:

A location contained one or more ZIP Codes.

CY02	Allegheny	Region
CY03	Allegheny	Region
CY04	Allegheny	Region
CY05	Southwest	Region
CY06	Southwest	Region
CY07	Southwest	Region
CY08	Southeast	Region
CY09	Southeast	Region
CY10	Southeast	Region
CY11	Pacific	Region
CY14	Western	Region
CY15	Western	Region
CY16	Western	Region
CY17	NY Metro	Region
CY18	NY Metro	Region
CY19	NY Metro	Region
CY20	Mid Atlantic	Region
CY21	Mid Atlantic	Region
CY22	Mid Atlantic	Region
CY23	Northeast	Region
CY26	Mid West	Region
CY27	Mid West	Region
CY28	Mid West	Region
CY29	Great Lakes	Region
CY30	Great Lakes	Region
CY31	Great Lakes	Region
CY32	Northeast	Random
CY33	Northeast	Random
CY34	NY Metro	Random
CY35	Southwest	Random
CY36	Great Lakes	Random
CY37	Great Lakes	Random
CY38	Allegheny	Random
CY39	Midwest	Random
CY40	Great Lakes	Random

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CY41	Great Lakes	Region
CY42	NY Metro	Region
CY43	NY Metro	Region
CY44	Southeast	Region
CY45	Southeast	Region

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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.

RESPONSE:

Yes, time constraints did not allow us to study all the sites selected.

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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.

RESPONSE:

More than one route was observed at the Phase 1 sites; therefore the teams were at the site for more than a day. It was not practical to travel to a site and conduct just a one day study.

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MPA/USPS-TI3-29. 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.

RESPONSE:

No, all sites had more than one day of observation.

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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?

RESPONSE:

We wanted maximum exposure in Phase1 to many different geographic sites to obtain representative samples. The multiple day studies in Phase 2 were to provide data about volume patterns as well as observing different carriers carrying the same route.

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

RESPONSE:

**A location/site used to test the engineered methods, standards and applications
that were developed. A test site may have one or more ZIP Codes.**

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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.

RESPONSE:

The intent was to identify monthly volume cycles through 30 calendar day studies.

However, due to resource allocation requirements multiple day studies of
variable calendar time spans were conducted.

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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.

RESPONSE:

CY02 and CY04 were also studied in Phase 2.

CY46	Western	Region
CY47	Western	Region
CY48	Midwest	Region
CY49	Southeast	Region
CY50	Pacific	Region
CY51	Pacific	Region
CY52	Pacific	Region
CY53	Pacific	Region
CY54	Southeast	Random
CY55	Southeast	Region
CY56	Southeast	Region
CY57	Mid Atlantic	Region
CY58	Mid Atlantic	Region
CY59	DC Metro	Region
CY60	Southwest	Region
CY61	Southwest	Region
CY62	Southwest	Region
CY63	Mid Atlantic	Region
CY64	Midwest	Region
CY65	Southeast	Region
CY66	Pacific	Random

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MPA/USPS-TI3-34. 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.

RESPONSE:

Yes, time constraints did not allow us to study all the sites selected. Records were not maintained on these sites.

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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.

RESPONSE:

Yes, time constraints did not allow us to study all the sites. Two sites selected at random were not studied. We are not aware of any records being kept on sites selected by the Regions that we did not study.

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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.

RESPONSE:

Level 11.4 contains the activity of, Finger @ Delivery, which are the actions of the carrier obtaining the mail while at the delivery point from the hand, and/or arm, and/or satchel, verifying the mail, and depositing the mail.

Level 11.4.1 contains the 1-Hand Slam which is a description of a type of mailbox where the carrier can in a upward sweeping motion open the mailbox and deposit the mail in a single downward motion.

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

RESPONSE:

You can run ratios from database. USPS-LR-I-163. Job_classification.

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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,

RESPONSE:

Yes, the data collectors used the sheets as presented. Numbers were also used
for inside work sampling and time study.

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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**

RESPONSE:

- (a) L12 Point of Delivery – carrier is at the location for depositing mail.**
- (b) L13 On Route – carrier is between the 1st delivery point and the last delivery and has not deviated from his route and is not at another listed location.**
- (c) L15 Miscellaneous – Any location not listed in the L10 level codes.**

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MPA/USPS-TI3-40. Please state the procedure used by data collectors when the wrong barcode was accidentally scanned. How was this corrected?

RESPONSE:

Observers maintained a comments log though the day for noting possible changes to the scans and typically made immediate notations of scans they knew needed to be edited. Upon completion of the data collection on the route the team would return to their hotel. They would print out reports, scan for abnormalities, view their Daily Comments Log for scan edits they noted during their workday, markup the reports in red with their recommended changes. After the review process they would make phone contact the central location, discuss any issues, make arrangements to upload the data collected to a central database, upload the data, and a discussion of previous edits may take place. Next they would make copies of the reports, and place original marked up reports and videotape along with any other documents in a priority mailer for mailing to the central location the next morning.

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

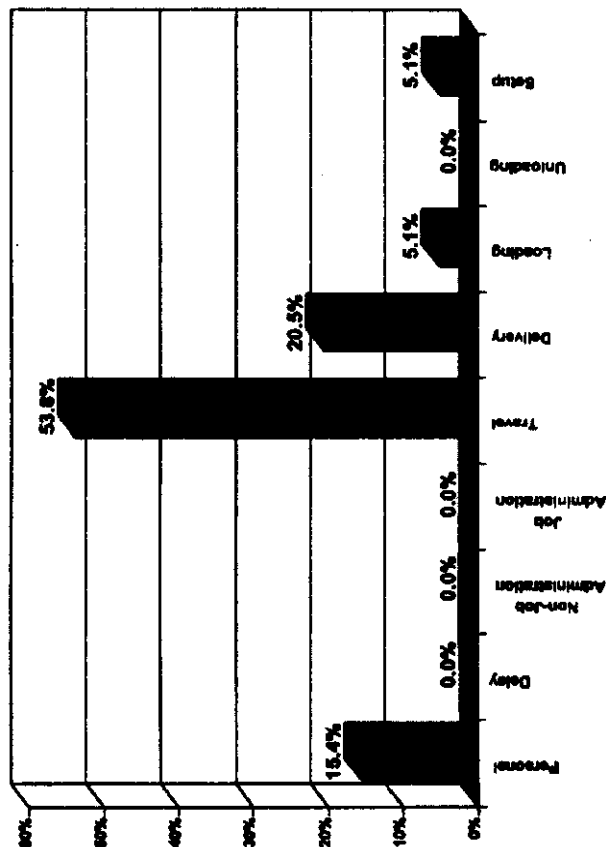
RESPONSE:

Outside Work by Delivery Type

11/1/88 6:15:33 PM

Criteria Selected: State/All Unit/All Job Classifications/JO01 to JO01 Observer/All Date Range:11/01/88 to 11/01/88

Delivery Type: WTRZ Curb



Data Collected - Work Sampling

12/16/97		08538		CY86		12/16/97 5:46:20 PM		Route: 8378		
Job Class	Location	Personal		Delivery Type and Status			Activities			
Regular Carrier	Point of Deliver	2:40 PM	N/A	2:40 PM	Curb	Resident Outside	2:40 PM	Del/Coll.	# 1 Box	2:40 PM
Regular Carrier	Point of Deliver	2:46 PM	N/A	2:46 PM	Curb	Resident Outside	2:46 PM	Del/Coll.	# 1 Box	2:46 PM
Regular Carrier	Point of Deliver	2:52 PM	N/A	2:52 PM	Central	Resident Outside	2:52 PM	Del/Coll.	Central Outside	2:52 PM
Regular Carrier	Point of Deliver	2:58 PM	N/A	2:58 PM	Central	Resident Outside	2:58 PM	Del/Coll.	Central Outside	2:58 PM
Regular Carrier	Point of Deliver	3:04 PM	N/A	3:04 PM	Central	Resident Outside	3:04 PM	Del/Coll.	Central Outside	3:04 PM
Regular Carrier	Point of Deliver	3:10 PM	N/A	3:10 PM	Central	Resident Outside	3:10 PM	Del/Coll.	Central Outside	3:10 PM
Regular Carrier	Point of Deliver	3:16 PM	N/A	3:16 PM	Curb	Resident Outside	3:16 PM	Parcel	Drop to Cust	3:16 PM
Regular Carrier	Vehicle	3:22 PM	N/A	3:22 PM	Curb	Resident Outside	3:22 PM	Travel B/t Divr.	LLV	3:22 PM
Regular Carrier	Point of Deliver	3:28 PM	N/A	3:28 PM	Central	Resident Outside	3:28 PM	Del/Coll.	Central Outside	3:28 PM
Regular Carrier	P B L	3:35 PM	Sbj Break	3:35 PM	Central	N/A	3:35 PM	N/A	N/A	3:35 PM
Regular Carrier	P B L	3:40 PM	Sbj Break	3:40 PM	Central	N/A	3:41 PM	N/A	N/A	3:41 PM
Regular Carrier	P B L	3:46 PM	Sbj Break	3:47 PM	Central	N/A	3:47 PM	N/A	N/A	3:47 PM
Regular Carrier	Vehicle	3:53 PM	N/A	3:53 PM	Central	N/A	3:53 PM	Return to Unit	LLV	3:53 PM
Regular Carrier	Vehicle	3:59 PM	N/A	3:59 PM	Central	N/A	3:59 PM	Return to Unit	LLV	3:59 PM
Regular Carrier	Work Station	4:05 PM	N/A	4:05 PM	Inside Work	N/A	4:05 PM	Mix	Mat'l Handling	4:05 PM

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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.

RESPONSE:

No written instructions were provided. The data collectors knowledge of the task was provided through on the job instruction by experienced data collectors.

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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.

RESPONSE:

The data collectors manually entered qualitative data through the keypad on the scanner. Beginning/ending odometer readings, temperature, Humidity, quantity of DPS mail, quantity of AM letters, quantity of AM flats, quantity of parcels, quantity of accountables, quantity of SPRs, Quantity of DAL cards, quantity of DPS missorts to route, quantity of DPS out of sequence, quantity of UBBM, quantity of missorts, weight of empty satchel, weight of loaded satchel, bundle method, carrier height, carrier age, carrier outseam, smoker, right handed, left handed, male, female, quantity of tubs, quantity of trays, carrier weight, carrier reach, distance to clock, distance to accountable cage, distance to hotcase, distance to parcel hamper, distance to throwback case, distance to vehicle, distance to relocate vehicle to dock, distance to distribution case one, distance to distribution case two, distance to distribution case three, distance to breakroom, distance to restroom, distance to supervisors desk, distance to first swinging door, number of type 1 delivery points on the 3999X, number of type 2 delivery points on the 3999X, number of type 3 delivery points on the 3999X, number of type 4 delivery points on the 3999X, number of type 5 delivery points on the 3999X, number of type 6 delivery points on the

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3999X, number of type 7 delivery points on the 3999X, number of type 8
delivery points on the 3999X, number of delivery points transferred to
another route, number of park points.

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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.

RESPONSE:

Data collectors could not alter data in the field.

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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.

RESPONSE:

Database managers knew the collection strategy from either by being a data collector or from designing the data collection.

See attached examples.

Data Collected - Work Sampling

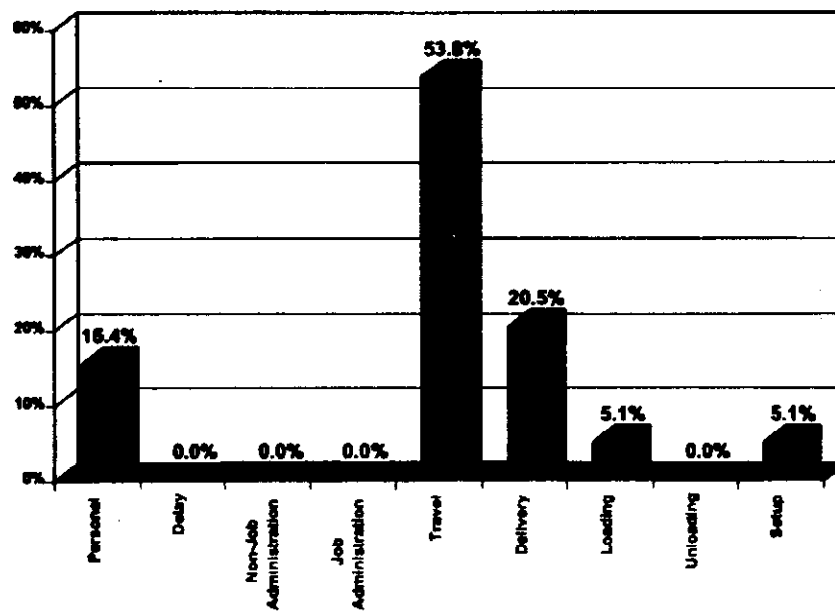
12/16/97		08530		12/16/97 5:48:20 PM		CY00		Route: 8370	
Job Class	Location	Personal	Delivery Type and Status	Activities					
Regular Carrier	Point of Deliver	2:40 PM	N/A	2:40 PM	Curb	Resident Outside	2:40 PM	Del/Coll.	# 1 Box 2:40 PM
Regular Carrier	Point of Deliver	2:46 PM	N/A	2:46 PM	Curb	Resident Outside	2:46 PM	Del/Coll.	# 1 Box 2:46 PM
Regular Carrier	Point of Deliver	2:52 PM	N/A	2:52 PM	Central	Resident Outside	2:52 PM	Del/Coll.	Central Outside 2:52 PM
Regular Carrier	Point of Deliver	2:58 PM	N/A	2:58 PM	Central	Resident Outside	2:58 PM	Del/Coll.	Central Outside 2:58 PM
Regular Carrier	Point of Deliver	3:04 PM	N/A	3:04 PM	Central	Resident Outside	3:04 PM	Del/Coll.	Central Outside 3:04 PM
Regular Carrier	Point of Deliver	3:10 PM	N/A	3:10 PM	Central	Resident Outside	3:10 PM	Del/Coll.	Central Outside 3:10 PM
Regular Carrier	Point of Deliver	3:16 PM	N/A	3:16 PM	Curb	Resident Outside	3:16 PM	Parcel	Drop to Cust 3:16 PM
Regular Carrier	Vehicle	3:22 PM	N/A	3:22 PM	Curb	Resident Outside	3:22 PM	Travel BA Dlv.	LLV 3:22 PM
Regular Carrier	Point of Deliver	3:28 PM	N/A	3:28 PM	Central	Resident Outside	3:28 PM	Del/Coll.	Central Outside 3:28 PM
Regular Carrier	P B L	3:35 PM	Sbj Break	3:35 PM	Central	N/A	3:35 PM	N/A	N/A 3:35 PM
Regular Carrier	P B L	3:40 PM	Sbj Break	3:40 PM	Central	N/A	3:41 PM	N/A	N/A 3:41 PM
Regular Carrier	P B L	3:46 PM	Sbj Break	3:47 PM	Central	N/A	3:47 PM	N/A	N/A 3:47 PM
Regular Carrier	Vehicle	3:53 PM	N/A	3:53 PM	Central	N/A	3:53 PM	Return to Unit	LLV 3:53 PM
Regular Carrier	Vehicle	3:59 PM	N/A	3:59 PM	Central	N/A	3:59 PM	Return to Unit	LLV 3:59 PM
Regular Carrier	Work Station	4:05 PM	N/A	4:05 PM	Inside Work	N/A	4:05 PM	Mix	Mat'l Handling 4:05 PM

Outside Work by Delivery Type

11/1/86 5:15:33 PM

Criteria Selected: State:All Unit:All Job Classifications:JC91 to JC91 Observer:All Date Range:11/01/86 to 11/01/86

Delivery Type: WTS2 Curb



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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MPA/USPS-T13-51. Please refer to your Testimony at page 13, line 15.
Please provide a definition for the term "outlier."

RESPONSE:

A data record that was out of the expected norm. Examples: would be a lunch
break scan at the end of the day, or six vehicle inspection scans back to back.

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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.

RESPONSE:

No problems were experienced.

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INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

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.

RESPONSE:

Donald Baron - contractor Foster Associates

Dennis Stephens - employee USPS

John Kelley - employee USPS

Robert Boldt – independent contractor with Resource & Process Metrics, Inc.

William Lloyd – Resource & Process Metrics, Inc.

We reviewed the definitions as stated in appendix F.

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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.

RESPONSE:

Dennis Stevens provided the STS definitions.

Definitions provided are exact to appendix F.

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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.**

RESPONSE:

- (a) Refer to column in Library Reference USPS-LR-I-163.**
- (b) Refer to column in Library Reference USPS-LR-I-163.**
- (c) Not available**
- (d) Not available**

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: 3-2-00

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.
Washington, D.C. 20260-1137
March 2, 2000