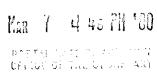**Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES
(ADVO/USPS-T13-1, 3-19abde, 20-22)

The United States Postal Service hereby provides the response of witness

Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-1, 3-19ab, 20-

22, filed on February 22, 2000. Interrogatory ADVO/USPS-T13-23 has been redirected

to the Postal Service. Objections were filed to interrogatories ADVO/USPS–T13-2 and

19(c).

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

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
March 7, 2000

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.

RESPONSE:

(a) Yes, the data presented in my testimony was one of many components used

to develop the engineered methods and time standards, and workload

managing system. The data presented us with a percent time distribution

picture of a day in the life of a carrier. The variability of the distribution

assisted us in determining the structure of the standards, areas of focus for

method improvements, and a design concept for the workload managing

system.

(b) The data was not used for in-depth analysis or validations of work methods.

The data presented us with a percent time distribution picture of a day in the

life of a carrier. The variability of the distribution assisted us in determining the

structure of the standards, areas of focus for method improvements, and a

design concept for the workload managing system.

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.

RESPONSE:

(a) I did not receive any written guidance for the selection of the specific locations

or routes from the Postal Service. In my discussions with USPS the approach

agreed on was to let the ten regions pick the sites and we would use Excel®

generated random numbers to pick the routes at the site. Also we would pick

some sites at random and at these sites once again pick the routes at random.

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

RESPONSE:

None.

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

RESPONSE:

None.

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.

RESPONSE:

(a) All data was collected by either employees and contractors from other

companies or contractors that were hired by my organization. USPS employees

did not collect the data using the bar code process.

(b) The contractors or employees of other companies came from a broad section

of career experience and educational levels.

(c) In Phase 1, the USPS Subject Matter Experts that were involved in the design

of the data to be collected rotated between collection teams observing the

collection process. In Phase 2, the USPS Subject Matter Expert, along with three

Phase 1 data collectors rotated between teams observing the collection process.

Also, the reports from the field were reviewed for logical scans by comparison to

other data being collected and reports.

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.

RESPONSE:

(a-b) A location contained one or more ZIP Codes.

Phase 1

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

(c) I did not keep any records on locations we did not visit.

(d) As far as I know we observed all routes that were picked at random. The team picked the routes daily.

(e) All routes were chosen using the random number process.

ADVO/USPS-T I3-8. 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.

RESPONSE:

The following is a copy of the email sent to the Regions by the USPS.

_____ Reply Separator _____

Subject: Re: Delivery Methods & Standards
Author: ▓▓▓▓▓▓▓▓▓ at CSIL001L
Date: 7/30/96 2:17 PM

Great Lakes Area submits the ▓▓▓▓▓▓▓ post office in the ▓▓▓▓▓
▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓

_____ Reply Separator _____

Subject: Delivery Methods & Standards
Author: ▓▓▓▓▓▓▓ at ERDHQDSS
Date: 7/22/96 12:34 PM

Gentlemen,

Engineering has contracted with ▓▓▓▓▓▓▓▓▓▓▓▓▓▓ for the development of engineered City Carrier methods and standards. Our customer is Operations Redesign, who was tasked by ▓▓▓▓▓▓▓ Headquarters Delivery, Labor Relations, and Operations Redesign is being keep informed of all activities by Engineering and the contractor team.

We need ten cities, one in each Area, where up to three delivery units per city could be used to collect data. The units should have a high DPS volume. There must be a mixture of routes, mounted, park and loop, business and residential. No Rural Carriers are to be observed.

The team will be there four weeks, starting October 7 with some starting as late as January 6. We would like to visit, not to collect data, a few times before that. Six to eight full time people with occasional visitors are expected to be used. They will have a hand held device which be used for the time study data collection. It looks like a pocket calculator. There will also be clipboards/note pads to record on.

We have asked ▓▓▓▓▓▓▓ to assist at the selection of units to use. We are seeking your permission and selection of units to study. The Delivery Perfect team has asked that we not use any units with the same NALC local as their test sites. Any visit to a unit would be coordinated through you.

_____ Forwarded with Changes _____
From: ▓▓▓▓▓▓▓▓▓▓ at ▓▓▓▓▓▓▓
Date: 10/9/96 12:15PM
To: ▓▓▓▓▓▓▓▓▓ at ▓▓▓▓▓▓
*cc: ▓▓▓▓▓▓▓▓▓▓▓
*cc: ▓▓▓▓▓▓▓▓▓ at ▓▓▓▓▓▓
*cc: ▓▓▓▓▓▓▓ at ▓▓▓▓▓
Subject: Re[3]: Delivery Methods & Standards
_____ Forwarded with Changes _____
From: ▓▓▓▓▓▓▓▓ at ▓▓▓▓▓▓
Date: 8/1/96 8:12AM
To: ▓▓▓▓▓▓▓▓ at ▓▓▓▓▓
cc: ▓▓▓▓▓▓▓▓▓ at ▓▓▓▓▓

Pacific Area's response.

Dick

_____ Forward Header _____

Subject: Re: Delivery Methods & Standards
Author: ████████████████████at SBCA002L
Date: 8/20/96 2:38 PM

As my secretary ██████, relayed to you on August 15, the ████████████
has been designated as the location to select test sites for the Delivery
Methods and Engineered Standards project. The ████████████has selected
████████ for the testing as that city matches your selection criteria. The
████████████ contact is████████and he can be reached at████
██████ If you need any further assistance, please let me know.

_____ Reply Separator _____

bject: Delivery Methods & Standards
uthor: ████████████at ERDHQDSS
Date: 8/15/96 9:36 AM

████████

We had hoped that each Area would participate in the Delivery Methods
& Engineered Standards project. It is not mandatory. We simply felt
that the buy-in from the Areas and the NALC would be better if all
Areas were involved. The NALC has been notified and is invited.   We
will be going to our first Experimental Site by the 9/3. This site
will be used to determine how we will collect data at the other sites.
I had sent two messages asking for test sites in your Areas. Please
consider involvement in this project.

_____

First message   7/22/96

Gentlemen,

Engineering has contracted with████████████████████for the
development of engineered City Carrier methods and standards. Our
customer is Operations Redesign, who was tasked by ████████████
Headquarters Delivery, Labor Relations, and Operations Redesign is
being keep informed of all activities by Engineering and the
contractor team.

We need ten cities, one in each Area, where up to three delivery units
per city could be used to collect data. The units should have a high
DPS volume. There must be a mixture of routes, mounted, park and

loop, business and residential. No Rural Carriers are to be observed.

The team will be there four weeks, starting October 7 with some
starting as late as January 6. We would like to visit, not to collect
data, a few times before that. Six to eight full time people with
occasional visitors are expected to be used. They will have a hand
held device which be used for the time study data collection. It looks
like a pocket calculator. There will also be clipboards/note pads to
record on.

We have asked ███████████ to assist at the selection of units to use.
We are seeking your permission and selection of units to study. The
Delivery Perfect team has asked that we not use any units with the same
NALC local as their test sites. Any visit to a unit would be
coordinated through you.

Follow up message   8/5/96

Thank you for your responses to the request for data collection sites
for the Delivery Methods & Standards Study. We have received
responses from 8 of the 10 areas.

The suggested locations from the Areas are:

Allegheny Area: ███████████

Great Lakes Area: ███████████

Mid-Atlantic Area: ███████████

Mid-West Area: ███████████
███████████
███████████

New York Metro Area: ███████████
███████████
███████████

Northeast Area: No information yet

Pacific Area: No information yet

Southeast Area: ███████████

Southwest Area: ███████████
███████████
███████████

Western Area: ███████████
███████████

────────────── Forwarded with Changes ──────────────
From: ███████████ a ███████████

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 6 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.

RESPONSE:

(a-c) Also see to ADVO/USPS-T13-7

Phase 2

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

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.

RESPONSE:

(a-b)

Phase 2

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

(c) I did not keep any records on locations we did not visit. Resource availability was the reason we did not observe all sites.

(d) As far as I know, we observed all routes that were picked at random. The teams picked the routes daily.

(e) All routes were chosen using the random number process.

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.

RESPONSE:

(a) One would drive the car and the other would scan and collect data.

(b) The team would arrive ½ to 1 hour before the start of the route. They would observe the case and if there had been any PM casing from the previous day then they were to count and record the cased volume. In addition, they would check the DPS end-of-run report, count, measure and weigh mail for the route, and count the paces from/to the various locations the carrier would travel in the office.

They would also check with they supervisor to determine which carrier/s would be carrying the route that day, and observe the carrier upon arrival to determine if any activities began pre-clock in. Typically, they would start the work sampling and time studies at clock-in. Every six minutes when the scanner beep went off the observers typically performed the work sampling. They would take time studies of the various inside activities counting the appropriate items such as number of letters cased, flats cased, bends, paces taken during the in office

time. They would videotape the case layout and inside activities for

approximately ½ hour. The video would be shot at various times throughout the

in-office time.

If possible, they would obtain quantitative data: temperature, humidity, carrier

– age, height, weight, left or right handed, gender, out-seam, bundle method,

smoker/non-smoker, length of reach.

They would follow the carrier throughout the day doing the work sampling, time

study, and videotaping. They would switch from collecting inside data to outside

data as the carrier clocked to the street or as the carrier cleared the office to load

the vehicle.

They would enter starting odometer reading and collect additional quantitative

data on the street portion of the day such as: the empty satchel weight, loaded

satchel weights at the beginning of a loop, temperature, humidity, wind, rain,

snow, hail.

Every six minutes, when the scanner beep went off, they typically

performed the work sampling. They would take time studies of the various

outside activities counting the appropriate items such as: number of paces

walked, number of delivery points served, number of doors and gates,

number of weighted or un-weighted bends made, number of trays/tubs

handled, distance in tenths of miles, final odometer reading. The team also

had a daily comments log for making notes about any special events, and

corrections to scans. They would videotape outside activities for

approximately ½ hour. The video would be shot at various times

throughout the street time.

Upon return to the unit, they would continue the work sampling, time study,

videotaping and recording of quantitative data. They would switch from street

activities to Inside-Office when the carrier clocked off the street and/or as the

carrier passed the time clock.

Breaks were accommodated by the other team member performing the data

collection tasks. Typically, time study and videotaping would be temporarily

interrupted and only work sampling would continue during break times. If

necessary, the data collectors could use the Observer Personal scan sequence if

they had to be away from the carrier.

I do not know how often team members traded activities.

Upon completion of the data collection on the route, the team would return to

their hotel. They would print out reports, scan for abnormalities, consult their

Daily Comments Log, and mark up the reports in red with their recommended

changes. After the review process they would make phone contact with the

central location, discuss any issues, make arrangements to upload the data

collected to a central database, and upload the data. 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.

Which team member performed which activities, how often they switched, and

how they supported each other was left up to team.

(c-d) I am not aware of any cases where only one data collector went out on a

route. We did not keep records as to the number of collectors out on the routes.

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?

RESPONSE:

(a) All instructions were given verbally to the data collectors. Videx provides a

user guide for programming the scanners with each scanner. I have not been

able to locate a copy of the guide.

(b) No, no observers were instructed to complete the scan a soon as possible.

(c) No.

(d) Yes, a date and time stamp is placed on each scan.

(e) Yes.

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.

RESPONSE:

(a) No written instructions were provided, all training was on the job.

(b) There were Postal Service subject matter experts and roving quality

assurance observers. These individuals acquired their knowledge by

participating in the development of the data collection structure.

(c) (1) No records were maintained on the number of route days requiring

change.

(2) No records were maintained on the number of individual observations

changed.

(d) Not available.

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.

RESPONSE:

(a-b) No instruction manuals exist. Initially the database managers were the

developers of the data collection. Additional database managers received on the

job instruction from the original database managers.

(c) The database managers would print a set of reports from the software by

selecting the observer, location and date. The database managers would then

compare these reports to the records and reports from the field observers.

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.

RESPONSE:

(a) No, If the database managers had a question about the recommended

changes, the database managers would discuss the question with the field

observer the next day. The observers and database managers would then

agree on the change. No summary records are available. The audit trail

exists, but only in raw collected form. The occurrence of this process was

very rare.

(b) Yes, on rare occasions records were identified by the database managers

and discussed with the observers before changes are made.

(c) No summary records are available. The audit trail exists but in raw collected

form. I do not have a list such as that requested.

(d) Method of changes are discussed in (a) above.

(e) A data record that was out of the expected norm. Examples: lunch break

scans at the end of the day, or six vehicle inspection scans back to back.

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.

RESPONSE:

(a) No summary records are available. The audit trail exists but only in raw

collected form. If the database managers had a question about the

recommended changes, the database managers would discuss the question

with the field observer the next day. The observers and database managers

would then agree on the change.

(b) Typically tallies were not eliminated, tallies were corrected.

(c) No full route days were purged.

(d) No summary records are available. The audit trail exists but only in raw

collected form.

(e) No summary records are available. The audit trail exists but only in raw

collected form.

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.

RESPONSE:

(a-h)

Unit Code	Route Number	Residential Other	Residential Curb	Residential Central	Residential NDCBU	Business Other	Business Curb	Business Central	Business NDCBU
CY02	1569	199	15	0	0	1	0	0	0
CY02	1579	275	50	0	195	45	1	15	0
CY02	1581	118	122	0	33	2	0	0	0
CY02	1595	352	0	0	142	0	0	0	0
CY03	4104	358	1	0	153	12	0	7	0
CY03	4106	198	166	0	0	4	31	0	0
CY03	4111	35	165	328	0	0	0	1	0
CY03	4114	215	190	0	0	0	0	0	0
CY03	4126	273	18	0	0	50	10	0	0
CY04	4207	0	215	0	0	26	0	0	2
CY04	4211	148	0	0	49	40	0	14	0
CY04	4213	72	0	0	0	75	0	0	13
CY04	4214	0	82	0	0	62	0	0	69
CY04	4218	0	93	0	0	615	2	0	0
CY04	4219	112	176	0	0	0	0	0	0
CY04	4221	97	239	0	0	0	0	0	0
CY04	4222	203	65	0	0	1	3	0	0
CY04	4224	149	10	0	33	112	2	0	0
CY04	4225	2	361	4	0	0	3	0	0
CY04	4228	0	236	0	0	49	0	3	11

CY04	4229	0	277	0	155	4	1	0	0
CY04	4230	42	0	0	50	136	0	47	10
CY04	4232	1	290	0	0	45	3	36	0
CY04	4233	383	0	0	0	34	0	8	0
CY04	4234	0	331	67	0	0	0	0	0
CY04	4235	90	38	0	0	69	1	0	0
CY04	4236	0	142	20	0	98	1	0	0
CY04	4237	177	0	0	30	91	0	0	0
CY04	4238	0	141	0	0	25	1	0	64
CY04	4241	0	111	86	0	68	2	0	26
CY04	4242	0	152	0	84	93	0	0	1
CY04	4243	0	254	0	56	0	62	0	0
CY04	4248	117	0	99	108	45	2	0	14
CY04	4249	0	202	15	16	13	4	0	0
CY04	4254	0	119	0	0	0	0	0	0
CY04	4257	51	159	0	0	50	16	9	0
CY04	4258	152	0	0	242	26	1	0	1
CY04	4259	176	0	0	0	60	0	0	0
CY04	4262	0	191	0	0	14	10	20	46
CY04	4265	163	48	0	0	65	0	14	0
CY04	4272	138	0		0	0	0	0	0
CY04	4285	142	7	122	146	1	0	0	0
CY04	4906	0	287	15	0	5	0	0	0
CY04	4908	0	80	0	0	78	7	0	0
CY04	4909	136	3	0	308	4	2	0	0
CY04	4910	0	106	0	0	23	1	0	66
CY04	4912	69	3	125	261	9	0	28	0
CY04	4915	0	316	0	0	7	11	0	0
CY04	4916	0	285	11	0	3	0	0	0
CY04	4917	0	73	0	0	0	0	0	0
CY04	4920	0	268	15	0	0	0	0	0
CY04	4926	0	562	0	0	0	2	0	0
CY04	4931	10	105	32	286	1	0	0	0
CY04	4940	0	349	0	0	0	0	0	0
CY04	4944	0	2	357	210	43	6	27	0
CY04	4945	0	25	263	0	55	11	43	0
CY04	4999	153	0	0	0	0	0	0	0
CY05	2806	340	0	0	0	118	0	0	0
CY05	2814	0	466	0	0	1	0	0	0
CY05	2822	374	0	0	0	0	0	0	0
CY05	2835	0	0	172	901	49	2	0	0
CY06	9302	0	369	0	0	0	2	0	0
CY07	8028	95	0	0	284	149	0	0	19
CY07	8035	49	396	0	0	0	0	0	0
CY07	8045	56	42	0	241	52	0	0	48
CY08	1620	26	409	0	0	0	0	0	0
CY08	1632	31	569	0	0	11	3	0	26
CY08	1638	217	3	0	37	0	0	0	0
CY09	2451	3	0	0	733	133	2	0	2

CY09	2465	90	0	336	447	18	0	0	0
CY09	2469	4	351	0	0	0	0	0	0
CY10	2155	2	257	14	0	4	23	6	1
CY10	2160	1	0	196	268	34	2	5	0
CY10	2167	7	281	83	0	5	4	7	19
CY10	2169	0	0	92	561	72	0	0	0
CY11	4708	346	0	8	223	46	0	0	0
CY11	4712	424	0	100	88	14	0	22	0
CY11	4719	442	0	0	43	1	0	0	0
CY11	4725	377	0	27	316	5	0	0	5
CY11	4731	291	0	24	241	0	0	0	0
CY11	4732	244	0	7	255	90	0	6	49
CY11	4811	100	0		0	0	266	4	0
CY11	4814	213	0	0	189	79	0	31	11
CY11	4817	296	0	0	0	72	0	0	19
CY11	4910	179	0	211	108	63	0	8	0
CY11	4921	320	0	101	226	0	0	0	0
CY15	1024	269	124	155	83	29	3	0	0
CY15	1061	340	22	0	234	17	5	0	1
CY16	1233	0	632	34	31	0	2	0	0
CY16	1237	0	486	15	48	51	21	0	0
CY16	1252	72	322	0	96	59	8	0	0
CY18	2934	499	0	0	0	22	0	0	0
CY19	4846	67	84	209	0	1	0	0	0
CY19	4880	104	94	0	162	13	1	0	0
CY23	0603	276	0	0	25	2	0	0	0
CY23	0607	218	0	0	0	0	0	0	0
CY23	0623	261	4	0	2	12	0	0	0
CY28	2374	0	24	40	513	26	47	14	0
CY28	2375	24	329	0	0	53	9	0	0
CY28	2385	209	166	0	203	8	0	22	0
CY29	4515	60	328	24	0	5	43	0	0
CY30	4442	0	424	148	0	0	0	0	0
CY38	8008	162	162	9	0	3	1	0	0
CY38	8044	0	308	0	31	1	25	30	1
CY38	8229	175	163	0	0	2	1	0	0
CY39	0908	0	152	272	177	24	0	0	8
CY39	1205	103	285	31	0	2	0	0	0
CY39	1206	0	72	370	386	2	0	0	0
CY40	8404	180	0	0	200	130	1	0	1
CY40	8405	477	0	0	0	3	0	0	0
CY40	8408	278	55	0	0	25	24	16	0
CY41	0626	0	0	0	0	39	0	0	0
CY42	1946	0	0	0	1151	31	0	0	0
CY46	1132	69	344	18	195	4	4	0	0
CY46	1133	18	369	23	191	0	0	0	1
CY46	1142	0	415	56	0	1	0	0	0
CY46	1145	161	203	51	34	0	0	0	0
CY46	1148	0	342	146	0	2	1	0	0

CY47	1411	372	75	0	0	0	0	0	0
CY47	1475	0	0	348	288	79	1	0	132
CY47	1507	71	184	354	0	16	0	0	8
CY47	1508	342	1	220	140	3	0	0	0
CY47	1586	224	0	301	0	0	0	0	0
CY48	0105	145	0	0	0	175	0	9	0
CY48	0146	367	23	0	0	3	0	0	0
CY48	0164	0	130	476	0	57	5	0	0
CY48	0337	0	387	0	0	1	1	0	0
CY49	0101	204	150	103	68	253	7	0	0
CY49	0102	81	6	0	24	313	91	0	1
CY49	0711	216	68	0	42	0	0	0	0
CY49	0716	0	345	299	0	2	5	1	0
CY50	8701	0	189	0	0	5	3	80	33
CY50	8702	2	572	0	0	2	1	11	0
CY50	8703	0	596	100	0	0	5	0	0
CY50	8705	0	308	0	0	44	7	18	0
CY50	8711	0	386	0	0	3	5	0	0
CY50	8714	0	459	0	0	0	0	0	0
CY50	8717	1	572	0	0	1	3	0	0
CY50	8726	1	573	0	0	0	1	0	0
CY50	8727	0	388	0	0	1	2	0	0
CY50	8729	2	540	0	0	0	0	0	0
CY50	8735	0	361	0	0	19	17	0	24
CY50	8736	1	558	0	0	1	0	0	0
CY50	8739	1	135	358	268	2	3	1	0
CY50	8744	0	351	0	0	0	0	0	0
CY50	8747	0	547	0	0	18	2	0	0
CY50	8748	0	483	0	0	0	0	0	0
CY50	8756		0	0	0	3	6	0	0
CY50	8759	1	134	358	268	2	3	1	0
CY50	8770	0	462	0	0	0	4	0	0
CY51	6156	33	417	0	0	0	0	0	0
CY51	6157	9	449	0	0	0	0	0	0
CY51	6410	478	1	0	26	73	0	1	0
CY51	6419	517	5	0	6	4	0	0	0
CY52	1101	40	0	20	714	35	0	0	6
CY52	1111	132	0	0	120	145	0	0	49
CY52	1121	140	145	0	0	1	0	0	0
CY52	1131	7	324	0	0	0	0	0	0
CY53	2201	362	0	0	0	24	0	0	14
CY53	2202	182	0	0	243	2	0	0	0
CY53	2203	333	0	0	116	0	0	0	0
CY53	2205	181	0	0	178	6	0	0	0
CY53	2206	315	0	0	109	3	0	0	0
CY53	2207	360	0	0	16	14	0	0	4
CY53	2210	189	0	0	271	34	0	0	0
CY53	2211	361	0	0	104	24	0	0	0
CY53	2212	291	0	0	43	0	0	0	0

CY53	2213	213	0	0	216	22	0	0	0
CY53	2214	182	0	0	393	28	0	0	0
CY53	2215	161	0	0	371	0	0	0	0
CY53	2216	369	0	0	107	0	0	0	0
CY53	2219	301	0	0	51	54	0	0	0
CY53	2221	269	0	0	95	85	0	0	0
CY53	2224	331	0	0	12	13	0	0	0
CY53	2225	347	0	0	22	1	0	0	0
CY53	2227	387	0	0	46	0	0	0	0
CY54	0411	351	33	0	0	48	0	0	0
CY54	0424	38	533	0	0	9	1	0	0
CY54	0432	585	38	0	0	16	0	0	0
CY54	0474	175	50	40	302	51	12	0	1
CY55	0611	328	0	0	0	10	0	0	0
CY55	0621	364	0	0	0	0	0	0	0
CY55	1605	1	18	0	0	145	4	14	172
CY55	1606	53	0	95	227	115	0	0	26
CY56	0405	220	3	168	95	44	4	1	1
CY56	0467	0	328	315	112	0	1	1	1
CY56	0498	0	73	115	457	55	65	40	0
CY56	1049	2	528	107	163	7	55	18	2
CY57	3704	327	0	0	84	3	0	0	0
CY57	3707	320	22	0	0	1	0	0	0
CY57	3709	49	0	0	467	33	0	0	0
CY57	3716	106	0	0	434	3	0	0	0
CY58	8212	201	0	0	6	0	0	0	0
CY58	8217	184	0	0	20	0	0	0	0
CY58	8218	4	0	0	573	0	0	0	0
CY58	8221	147	14	0	0	0	8	0	0
CY59	0305	173	0	0	110	79	0	0	5
CY59	0320	355	0	12	240	21	0	0	0
CY59	2402	33	0	0	520	3	0	0	0
CY59	2417	130	0	0	313	2	0	0	0
CY60	1901	96	394	4	0	93	15	18	0
CY60	1913	561	2	0	0	17	0	0	0
CY60	1917	0	48	282	337	118	61	82	0
CY60	1929	253	348	0	0	11	3	0	0
CY61	2717	0	383	167	70	13	1	0	0
CY61	4271	0	634	0	157	7	0	0	0
CY61	4273	0	728	161	0	2	4	0	0
CY61	4275	0	687	0	0	4	0	0	0
CY62	0406	129	0	0	0	155	2	0	0
CY62	0415	470	0	0	0	44	0	0	0
CY62	0424	363	1	68	513	24	1	0	0
CY62	0426	178	7	15	152	168	3	0	0
CY63	0801	193	1	0	0	6	0	0	0
CY63	0802	251	0	0	0	1	0	0	0
CY63	0803	192	1	0	0	2	0	0	0
CY63	0806	413	0	33	12	1	0	0	0

CY63	0807	174	172	0	0	1	0	0	0
CY63	0808	342	6	0	0	0	0	0	0
CY63	0809	311	0	0	0	0	0	0	0
CY63	0811	103	47	0	0	98	0	0	0
CY63	0815	367	1	0	0	0	0	0	0
CY63	0816	208	1	0	0	0	0	0	0
CY63	0817	283	0	0	0	1	0	0	0
CY63	0819	267	10	1	0	53	1	0	0
CY63	0820	249	66	0	0	0	0	0	0
CY63	0821	145	24	0	0	106	0	0	0
CY63	0822	46	250	0	0	0	0	0	0
CY63	0823	190	32	0	285	10	1	0	21
CY63	0824	242	140	0	0	1	0	0	0
CY63	0825	8	269	0	0	1	0	0	0
CY63	0827	75	77	0	0	153	10	0	0
CY63	0828	168	95	0	0	0	0	0	0
CY63	0830	163	161	84	0	51	0	0	0
CY63	0831	0	255	198	0	9	0	1	0
CY63	0832	150	0	0	66	109	0	20	33
CY64	1401	407	4	0	0	5	1	0	0
CY64	1457	168	53	32	79	86	0	0	0
CY64	2407	1	243	8	16	51	1	0	0
CY64	2411	0	268	0	0	5	1	0	0
CY66	0101	133	1	134	68	121	0	12	48
CY66	0102	324	7	55	112	51	0	5	0
CY66	0103	43	0	0	0	325	0	0	10
CY66	0104	51	2	9	90	182	0	0	5
CY66	0105	202	15	174	46	91	0	73	27
CY66	0106	291	53	166	68	54	0	14	4
CY66	0107	138	126	80	22	115	3	12	33
CY66	0108	172	25	13	36	104	1	27	0
CY66	0110	308	23	159	154	17	0	0	0
CY66	0111	15	399	259	4	8	10	90	0
CY66	0112	378	94	161	9	8	0	0	0
CY66	0113	211	88	321	0	42	6	2	0
CY66	0114	8	307	236	0	53	21	24	0
CY66	0115	15	419	98	0	13	26	18	0
CY66	0116	280	221	31	0	3	0	0	0
CY66	0117	137	377	135	0	1	0	0	0
CY66	0119	220	165	118	0	16	0	19	4
CY66	0120	482	35	27	0	12	2	0	0
CY66	0123	288	133	102	28	42	1	1	2
CY66	0124	14	221	377	0	11	25	44	0
CY66	0126	293	104	157	18	1	1	0	0
CY66	0128	240	155	241	0	112	14	25	0
CY66	0129	208	6	256	0	1	0	0	0
CY66	0130	99	17	364	0	0	0	0	0
CY66	0131	0	0	318	0	0	0	0	0
CY66	0240	28	29	82	0	200	8	75	17

CY66	0241	24	216	322	139	88	8	13	4
CY66	0242	127	163	59	0	66	0	13	49
CY66	0243	1	182	22	102	146	9	8	21
CY66	0244	84	424	147	40	19	9	69	8
CY66	0245	323	96	225	4	0	2	0	0
CY66	0246		350	225		16	1		10
CY66	0247	56	355	276	146	9	7	21	0
CY66	0248	33	345	373	0	3	6	3	0
CY66	0249	147	156	312	0	3	0	0	0
CY66	0250	47	34	154	4	176	3	24	5
CY66	0251	115	159	342	0	68	6	10	11
CY66	0252	169	170	264	0	10	23	38	0
CY66	0253	226	72	212	147	87	5	54	0
CY66	0254	165	150	367	0	1	0	0	0
CY66	0255	24	0	620	0	8	0	0	0
CY66	0256	458	0	187	0	1	0	0	0
CY66	0257	73	51	488	8	73	14	16	0
CY66	0281	54	164	213	0	59	70	146	0
CY66	0370	1	327	401	0	1	5	1	0
CY66	0371	19	12	757	143	13	5	9	0
CY66	0372	270	119	346	26	26	5	11	0
CY66	0373	6	404	452	0	8	30	27	0
CY66	0374	199	0	415	124	0	0	0	0
CY66	0375	1	346	440	0	27	8	23	0
CY66	0376	65	98	35	307	44	1	0	0
CY66	0377	29	107	712	67	14	9	16	0
CY66	0378	157	131	326	148	6	2	10	0
CY66	0379	20	8	668	0	110	4	44	0
CY66	0380	91	293	505	8	6	2	0	0
CY66	0382	314	54	251	0	1	0	0	0
CY66	0383	53	21	671	50	68	1	32	0
CY66	0384	5	26	769	0	4	1	21	0

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.

RESPONSE:

(a-h) No summary records maintained on the actual deliveries made.

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
Curbline Access Test, or the Load Time Variability Test? If so, what
documentation did you review, and when did you review it?

RESPONSE:

(a) August/September 1999

(b) 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.

(d)Yes, we received definitions as stated in appendix F.

(e) No other tests were reviewed.

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.

RESPONSE:

We provided to the USPS and USPS contractors the description of the content of

the Engineered Standards observations/tallies. The USPS provided the six

definitions from appendix F of my testimony.

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?

RESPONSE:

(a) 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.

(b) The barcode scanners six minute intervals began when the scanner was removed from the docking station. The observations began when the carrier clocked in. Observations continued through the entire day, including breaks. All routes were observed in an identical manner.

(c) None, observations continued through the entire day.

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 I-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.

RESPONSE:

(a-b) An initial test was performed manually, after this test a query was written in

Access® to define the entire database.

(c) A record-by-record comparison was performed.

(d) Please refer to Appendix D and Appendix F of my testimony.

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

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March 7, 2000