

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

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POSTAL RATE AND FEE CHANGES, 2000  
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**SECOND SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS RAYMOND  
(MPA/USPS-T13-57-81)**  
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**(March 7, 2000)**

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS Witness Raymond (MPA/USPS-T13-57-81).

Respectfully submitted,



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

**MPA/USPS-T13-57.** Please refer to page 10 of your testimony, where you state:

... the TW2 was programmed with the data collection hierarchy and to emit an audible tone to notify collectors to collect work-sampling data. The collection of the work-sampling data began with this tone. At the beep, the LCD on the TW2 prompted data collectors with the word/phrase representing each level of the collection hierarchy. Information was required to be collected/scanned at each level of the hierarchy. In general, all sub-level information (detail level) was scanned before the data collector continued the scanning process at the next level.

Please provide all systematic written or oral instructions that were given the data collectors as to the exact instant or period of carrier time to be recorded.

- (a) For what period of carrier activity was the observation intended to record (e.g., an instant snapshot of the activity just as the beep occurred, a snapshot 5 or more seconds after the beep occurred, a snapshot at the next convenient location after the beep, the next several seconds of the carrier's activity just as the beep occurred, several seconds at the next convenient location after the beep)?
- (b) With respect to your response in (a), what systematic efforts did you make to ensure that all data collectors correctly recorded the same instant or period of time in the same manner? For example, do any video records exist that could be matched to data records to validate the actual observations?

**MPA/USPS-T13-58.** For the observed routes:

- (a) Were all of them designed as 8-hour routes? If not, please identify the ones that were not and specify their designed length.
- (b) Was all 8 hours of the carrier's day observed and recorded? If some routes or days were treated differently in this respect than others, please distinguish route/day, and please explain why this was done.
- (c) For any route, for any observation day, did any of the carriers exceed their 8 hours or did any complete their work before their 8 hours were

over? Please identify all such route/days and explain how the observations proceeded in those cases.

- (d) Did all the routes have a full-time regular carrier? If some of the data were for someone other than a full-time regular carrier, please explain what type of personnel each route had.
- (e) When a chosen route had router or auxiliary assistance, how did you treat it?
- (f) Please identify each route-day that also had router or auxiliary assistance.
- (g) Did you determine how long it had been since each route was evaluated by a supervisor? If so, please indicate those routes for which you have this period and the length of the period since last evaluated.
- (h) Did all the routes receive Delivery Point Sequenced (DPS) volume? If not, please identify the ones that did.

**MPA/USPS-T13-59.** Please refer to your testimony at Appendix C.

- (a) Throughout Phases 1 and 2 of the data collection, were the same sheets, with the barcodes in the same order, used for each route?
- (b) At any time, was there any effort made to determine that the order or placement of the barcodes on those sheets did not bias the data collection in any way? Please describe it.
- (c) Please describe or provide a photo of exactly how the data collector handled both the barcode sheets and the Videx TimeWandII.

**MPA/USPS-T13-60.** Please identify, by code, each of the data collectors employed to collect this data, relate them to each route-day of data collected, and specify the ones which had previous experience (in projects other than one in which you collected this time-proportion data and the standards data) observing postal delivery carriers for purposes of identifying specific activities. If more than one collector collected this data on a particular day, please provide separate information for each.

**MPA/USPS-T13-61.** Please refer to your testimony at Appendix D Level 10 Locations, and please provide the following:

- (a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 10 Locations.
- (b) All systematic efforts made to ensure that the L00-L24 codes were consistently and correctly applied by all data collectors.

**MPA/USPS-T13-62.** Please provide all systematic written or oral guidance to the data collectors on how to identify and distinguish between the following location codes:

- (a) L08 Vehicle and L07 Dock, L09 Park Point, L13 On Route, L17 Gas Station, L19 In Vehicle at Stop, and L20 In Vehicle in Traffic.
- (b) L13 On Route and L09 Park Point, L10 Collection Box, L11 Relay Box, L12, Point of Delivery, L19 In Vehicle at Stop, L20 In Vehicle in Traffic, and L21 Wait when Walking.
- (c) L09 Park Point and L10 Collection Box, L12 Point of Delivery, L20 In Vehicle at Stop.

**MPA/USPS-T13-63.** Please identify what kinds of locations the data collectors would identify as Site Location L15 (Miscellaneous).

**MPA/USPS-T13-64.** With respect to Level 11.2 Delivery Type, please provide:

- (a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 11.2 Delivery Types.
- (b) A description of all systematic efforts made to ensure that the WT01-WT05 codes were consistently and correctly applied by all data collectors.
- (c) The systematic written or oral guidance given to data collectors with respect to distinguishing between a WT04 Dismount Delivery and a WT05 Central Delivery, in terms of type of mail equipment and mail

receptacles used.

**MPA/USPS-T13-65.** Please explain how the data collectors assigned a Level 11.2 Delivery Type and Level 11.3 Delivery Type Status when the carrier was moving from one kind of delivery type or delivery type status to another.

**MPA/USPS-T13-66.** Please state, with respect to delivery types:

- (a) Whether motorized carriers ever dismount to make centralized deliveries. If so, please explain how the data collectors distinguished between the "dismount" and "centralized".
- (b) Whether some carriers ever remain in their vehicles (at curblines) while delivering to NDCBU or other types of centralized outside boxes. If so, please explain how the data collectors distinguished between "curblines" and "centralized".
- (c) Whether central deliveries are made by both motorized and foot carriers. Please explain.

**MPA/USPS-T13-67.** With respect to the Level 11.4 activities, please provide the following:

- (a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 11.4 Activity alternatives.
- (b) All systematic written or oral guidance that was given to the data collectors concerning the relationships between 11.4 Outside Activity and 11.4.1 Activity Detail codes.
- (c) The systematic written or oral guidance given to data collectors on how to distinguish among T05 (walking) and T01 Travel to First Delivery Point, T02 Travel b/t Delivery, and T03 Travel b/t w/Sort.
- (d) How were the data collectors systematically instructed to tell the difference between D08 Delay Specify and F04 Delay Specify?
- (e) How were the data collectors systematically instructed to tell the difference between J04 Parcels and F02 Parcels?
- (f) A description of all systematic efforts to ensure that the Level 11.4

codes were consistently and correctly applied by all data collectors.

**MPA/USPS-T13-68.** With respect to the relationship between Level 10 (Location) and Level 11.4 (Activity) codes, please provide all systematic written or oral guidance you gave your data collectors (and data processors) on Level 11.4 codes which are always or should never be associated with the following:

- (a) Dock Location.
- (b) Vehicle Location.
- (c) Park Point Location.
- (d) Collection Box Location.
- (e) Relay Box Location.
- (f) Point of Delivery Location.
- (g) On Route Location
- (h) Miscellaneous Location
- (i) Gas Station Location
- (j) In Unit Walking Location
- (k) In Vehicle at Stop Location
- (l) Wait When Walking Location
- (m) Other Route Location

**MPA/USPS-T13-69.** With respect to the Level 11.2 (Delivery Type) and Level 11.3 (Delivery Type Status) codes, please:

- (a) Confirm that all but 22 of your 39,046 tallies identifies a Delivery Type, even those for Dock, Collection Box, Miscellaneous, Gas Station, In Unit Walking, In Vehicle in Traffic, and Wait While Walking.
- (b) Confirm that all but 4,076 of your 39,046 tallies identifies a Delivery Type Status.
- (c) Provide the systematic guidance that you gave your data collectors (and data processors) on how to correctly identify delivery type for tallies not at the point of delivery.
- (d) Provide all systematic guidance that you gave your data collectors (and data processors) on how to correctly identify delivery type status for tallies when the Level 10 code was not Point of Delivery.
- (e) Explain why the data collectors assigned delivery type and delivery type status codes to locations that were not at the point of delivery.

**MPA/USPS-T13-70.** With respect to the relationship between Level 11.4 (Activity) and Level 11.4.1 (Activity Detail) codes, please provide all systematic written or oral guidance that you gave your data collectors (and data processors) on the following:

- (a) The circumstances when Activity T codes are associated with something other than Activity Detail K codes.
- (b) Which activity detail codes should always or never be associated with Activity T codes.
- (c) When D codes should be associated with anything other than Activity Detail I codes.
- (d) Which activity detail codes should always or never be associated with Activity D codes.
- (e) When Activity J codes should be associated with anything other than Activity Detail H codes.
- (f) Which activity detail codes should always or never be associated with Activity J codes.
- (g) When F codes should be associated with anything other than Activity Detail G codes.
- (h) Which activity detail codes should always or never be associated with Activity F codes.

**MPA/USPS-T13-71.** With respect to the relationship between Level 11.3 (Delivery Type Status) and Level 11.4.1 (Activity Detail), please provide all systematic written or oral guidance that you gave your data collectors (and data processors) on which Level 11.4.1 H codes (delivery receptacle type) should go with which delivery type status codes.

**MPA/USPS-T13-72.** Please consider Level 11.4 Activity Code D01 (No Access to Box).

- (a) What specific physical action was the data collector observing. Please explain how that could be determined from the data.
- (b) For D01, do the data indicate whether and how the mail was actually delivered to that particular customer? Please explain.

**MPA/USPS-T13-73.** With respect to Level 11.4 Activity Code F03 (Hardship), what specific physical action was the data collector observing? Please explain how that could be determined from the data.

**MPA/USPS-T13-74.** For Level 11.4 Activity code F01 (accountable), please provide the following information:

- (a) At point of delivery, when an accountable (F01) is indicated, does that mean that only an accountable was delivered to that point at that time? Please explain how that can be determined from the data.
- (b) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail? Please explain.
- (c) What specific physical action was the data collector observing? Please explain how that can be determined from the data.
- (d) If at point of delivery, does F01 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data..
- (e) At any other Level 10 location code, other than point of delivery, when an accountable is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data.
- (f) When Activity Detail Codes G01 (public relations), G02 (service rates), G03 (directions), G04 (excess words), or G05 (excess words) were indicated with F01 (Accountable), did that mean that those activities were required to physically deliver the mail to the customer? Or were they activities that did not necessarily have to be associated with the delivery? Please explain.



**MPA/USPS-T13-75.** For Level 11.4 Activity code F02 (parcel), please provide the following information:

- (a) At point of delivery, when a parcel (F02) is indicated, does that mean that only a parcel was delivered to that point at that time? Please explain how that can be determined from the data.
- (b) Can the data be used to determine whether that point of delivery was served a second time that day with all other mail?
- (c) What specific physical action was the data collector observing? Please explain how that can be determined from the data.
- (d) If at point of delivery, does F02 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data.
- (e) At any other Level 10 location code, other than point of delivery, when a parcel is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data. Please explain.
- (f) When Activity Detail Code G01 (public relations), G02 (service rates), G03 (directions), G04 (excess words), or G05 (excess words) was indicated with F02, did that mean that those activities were required to physically deliver the mail to the customer. Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

**MPA/USPS-T13-76.** For Level 11.4 Activity code J04 (parcels), please provide the following information:

- (a) At point of delivery, when parcels (J04) are indicated, does that mean that only parcels were delivered to that point at that time? Please explain how that can be determined from the data.
- (b) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other

mail?

- (c) What specific physical action was the data collector observing? Please explain how that could be determined from the data.
- (d) If at point of delivery, does J04 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that could be determined from the data.
- (e) At any other Level 10 location code, other than point of delivery, when parcels are indicated, what specific physical action was the data collector observing? Please explain how that could be determined from the data.
- (f) When Activity Detail Codes G01 (public relations), G02 (service rates), G03 (directions), G04 (excess words), or G05 (excess words) are indicated with J04, does that mean that those activities were required to physically deliver the mail to the customer? Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

**MPA/USPS-T13-77.** For Level 11.4 Activity code J06 (mix), please provide the following information:

- (a) At point of delivery, when mix (J06) is indicated, does that mean a mix of mail was delivered to that point at that time? If so, does it indicate any particular products? Please explain how that can be determined from the data.
- (b) Does J06 indicate any particular type of mail container or a particular method of mail delivery, as opposed to a typical delivery of multiple postal products? Please explain.
- (c) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail?
- (d) What specific physical action was the data collector observing? Please explain how that can be determined from the data.
- (e) If at the point of delivery location, does J06 indicate whether the

delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data.

- (f) At any other Level 10 location code, other than point of delivery, when J06 is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data.
- (g) When Activity Detail Code G01 (public relations), G02 (service rates), G03 (directions), G04 (excess words), or G05 (excess words) were indicated with J06, does that mean that those activities were required to physically deliver the mail to the customer. Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

**MPA/USPS-T13-78.** For Level 11.4 Activity Code F03 (Hardship):

- (a) What specific physical activity was the data collector observing? Please explain how that can be determined from the data.
- (b) Do the data indicate whether and how mail was delivered to that particular customer? Please explain.

**MPA/USPS-T13-79.** Please provide all systematic written and oral guidance you gave your data collectors (and data processors) on which Level 11.4.1 Activity Detail codes are always or should never be associated with the following Activity codes:

- (a) No Access to Box
- (b) Vehicle Breakdown
- (c) Weather
- (d) Traffic/Detour
- (e) No Work
- (f) Delay-Specify (D08)
- (g) Accountable
- (h) Parcel
- (i) Hardship
- (j) Delay-Specify (F04)
- (k) Parcels
- (l) Mix

- (m) Delivery/Collection
- (n) Loading
- (o) Unloading
- (p) Setup
- (q) Finger @ Delivery
- (r) N/A
- (s) Travel to 1 Delivery
- (t) Travel b/t Delivery
- (u) Travel b/t w/sort
- (v) Return to Unit
- (w) Walking.

**MPA/USPS-T13-80.** Please explain why activity detail H codes (codes for mail collection and receptacle boxes) were used with the following outside activities:

- (a) Finger@Delivery
- (b) N/A
- (c) Delay
- (d) No Access to Box
- (e) Setup
- (f) Travel B/T Deliveries
- (g) Walking
- (h) Hardship.

**MPA/USPS-T13-81.** Please explain why a mail receptacle code (activity detail H code), other than drop to customer, was used with the Accountable outside activity.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.

  
Anne R. Noble

Washington, D.C.  
March 7, 2000