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

POSTAL RATE AND FEE CHANGES, 2000   )
)   **Docket No. R2000-1**
)

**THIRD SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
TO USPS WITNESS RAYMOND
(MPA/USPS-T13-82-109)**

(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-T13-82-109).

Respectfully submitted,

James R. Cregan
Anne R. Noble
Counsel
Magazine Publishers of America, Inc.
Suite 610
1211 Connecticut Avenue NW
Washington DC 20036
(202) 296 7277

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

MPA/USPS-T13-82. For STS Type, Collection Box, please confirm that there are no tallies identifying the carrier either walking or driving to or from a collection box. Please explain why.

MPA/USPS-T13-83. There are several tallies at "Collection Box" location which indicate unloading activities. Per Appendix D, "Unloading" (code J09) applies to vehicles while del/coll (code J08) applies to unloading collection boxes. Please explain what the data collectors were observing when these tallies were taken and explain how you know that.

MPA/USPS-T13-84. When a Relay Box is also a Collection Box, how did the data collectors indicate location?

MPA/USPS-T13-85. When the Relay Box location is associated with "Wait 4 Collectn" activity or "Coll't Box" detail, how did you determine whether it should be allocated to Collection or Street Support?

MPA/USPS-T13-86. For the following tally types, please explain what STS activity the data collectors were observing, how you know that, and why you assigned the specified STS category. Please note that in some cases two or more STS categories are assigned to the same combination of Location-Activity-Activity Detail. In those cases, please explain why you have made distinctions. (If same tally type is included in more than one STS category, in the list below, it is asterisked.)

	STS Category	Location(s)	Activity(ies)	Activity Detail(s)
a.	Drive	In Vehicle at Stop,* Park Point, Vehicle*	Delay Codes (D Codes)	N/A
b.	Drive	In Vehicle at Stop,* Misc, On Route,* Vehicle,* Wait When Walking	Delay Codes (D Codes)	Delay Codes (I Codes)
c.	Drive	In Vehicle at Stop*	DelaySpcfyDeta	Delay Codes (G Codes)

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d.	Drive	In Vehicle at Stop, Park Point, Vehicle*	N/A	Vehicle Codes (K Codes)
e.	Drive	Vehicle,* Misc, Wait When Walking	Delay Codes (D Codes)	Vehicle Codes (K Codes)
f.	Drive	Misc	N/A	Central Inside
g.	Drive	Misc,* Park Point, Vehicle*	N/A	N/A
h.	Drive	On Route	Travel B/t Dlvr.	Walking Push Cart
i.	Drive	On Route, Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
j.	Drive	On Route	Travel to 1 Dlvr	Vehicle Codes (K Codes)
k.	Drive	Vehicle	Del/Coll	Vehicle Codes (K Codes)
l.	Drive	Vehicle*	Parcel or Accountable	Drop to Customer
m.	Drive	Vehicle*	Parcel or Accountable	N/A
n.	Drive	Vehicle	No Access to Box	Vehicle Codes (K Codes)
o.	CAT	In Vehicle at Stop,* Misc, On Route, Vehicle*	Delay Codes (D Codes)	N/A
p.	CAT	In Vehicle at Stop,* In Vehicle Traffic, On Route,* Vehicle*	Delay Codes (D Codes)	Delay Codes (I Codes)
q.	CAT	In Vehicle at Stop, Vehicle*	Delay Codes (D Codes)	Vehicle Codes (K Codes)
r.	CAT	Misc	DelaySpcfyDetail	N/A
s.	CAT	Misc, Vehicle*	N/A	Vehicle Codes (K Codes)

t.	CAT	Misc,* On Route, Vehicle*	N/A	N/A
u.	CAT	On Route, Vehicle*	Parcel or Accountable	N/A
v.	CAT	On Route	Travel B/t Dlvr.	Walking Codes (K Codes)
w.	CAT	Point of Delivery	Travel B/t Dlvr.	Vehicle Codes (K Codes)
x.	CAT	Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
y.	FAT	Misc, On Route	Delay Codes (D Codes)	N/A
z.	FAT	On Route*	Delay Codes (D Codes)	Delay Codes (I Codes)
aa.	FAT	Vehicle*	Delay Codes (D Codes)	Vehicle Codes (K Codes)
bb.	FAT	Vehicle*	Parcel or Accountable	N/A
cc.	FAT	Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
dd.	FAT	Misc	Walking	Walking Codes (K Codes)
ee.	FAT	Misc	No Work	N/A
ff.	FAT	On Route*	N/A	N/A
gg.	FAT	On Route	No Access to Box	N/A
hh.	FAT	On Route,* Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
ii.	FAT	On Route,* Vehicle*	Parcel or Accountable	N/A
jj.	FAT	On Route	Travel B/t Dlvr.	Receptacle Codes (H Codes)
kk.	FAT	On Route	Travel to 1 Dlvr.	Walking Codes (K Codes)
ll.	FAT	Vehicle	N/A	Mat'l Handling

M m.	Street Support	Misc	DelaySpcfyDetail	Delay Codes (G Codes)
nn.	Street Support	Misc*	N/A	N/A
oo.	Street Support	On Route, Vehicle	DelaySpcfyDetail	N/A
pp.	Street Support	On Route	No Work	N/A
qq.	Street Support	Point of Delivery	Return to Unit	Vehicle Codes (K Codes)
rr.	Street Support	Vehicle*	N/A	N/A
ss.	Street Support	Vehicle	Mix	Material Handling
tt.	Street Support	Vehicle	Parcels	Material Handling
uu.	Street Support	Vehicle*	Delay Codes (D Codes)	N/A
vv.	Street Support	Vehicle	Delay Codes (D Codes)	Union
ww.	Street Support	Wait When Walking	No Work	N/A

MPA/USPS-T13-87. For the "Vehicle" location, for foot deliveries, there are some "Travel B/t Dlvr." activity tallies with either N/A or Walk detail. In some cases, you assign those tallies to Drive Time and in some cases you assign them to the FAT Run or Street Support Time categories.

(a) With the use of a vehicle, what is the distinction between foot, park and loop, central, and dismount deliveries?

(b) What were the data collectors observing at that time and how do you know it?

(c) How did you decide to assign those tallies to the STS categories?

MPA/USPS-T13-88. For the "On Route" location, for curbline deliveries, there are some "Travel B/t Dlvr." activity tallies with Walk (Code K) detail. These are assigned to the CAT Run Time category.

(a) What were the data collectors observing at that time and how do you know it?

(b) How did you decide to assign those tallies to the CAT Run Time category?

MPA/USPS-T13-89. For the "On Route" location, there are some "Travel B/t Dlvr." activity tallies with Walking Push Cart detail. Some of these are assigned to the Drive Time category and some are assigned to the FAT Run Time category. Separately, there are some "Walking" and "Travel B/t Dlvr. w/Sort" activity tallies with "Walking Push Cart" detail assigned to the FAT Run Time category. For each of these tally types, please explain:

(a) What were the data collectors observing at those times and how do you know it?

(b) How did you decide to assign those tallies to STS categories?

MPA/USPS-T13-90. For the "On Route" location, with curbline deliveries, there are some "Accountable" and "Parcel" activity tallies with "LLV" detail. These are assigned to the FAT Run Time category. Please explain:

(a) What were the data collectors observing at those times and how do you know it?

(b) How did you decide to assign those tallies to the FAT Run Time category?

MPA/USPS-T13-91. Please confirm that you allocate no tallies indicating Curbline Delivery type to Drive Time.

MPA/USPS-T13-92. Can you tell when the "Travel B/t Dlvr." tally occurrred between a curbline and another type of deliver? If so, please explain.

MPA/USPS-T13-93. Assume a carrier has just stopped his vehicle at a parking

point for either a set of Central or Dismount deliveries within a single building:

(a)   If he has not yet left the vehicle, what location would a data collector record: In Vehicle at Stop, On Route, or Vehicle?

(b)   If he is working at his vehicle (e.g., unloading a tray of mail), what location would a data collector record?

(c)   If he has left the vehicle and is proceeding to make his deliveries but has not yet gotten to the first delivery, what location would a data collector record?

(d)   If he has reached the first delivery and is moving towards the next, what location would a data collector record?

(e)   If he is returning to his vehicle from the last delivery on that stop, what location would a data collector record?

MPA/USPS-T13-94.   With some minor exceptions, virtually all tallies, regardless of Location Code, which have "Delay Specify Detail" or N/A activity with a Code G activity detail (e.g., public relations, service rates, directions, excess words), have been allocated to Load.

(a)   Please explain why you have done this.

(b)   Please explain why a few of these types of tallies were also allocated to Street Support and Drive Time.

MPA/USPS-T13-95.   Please confirm that all the "Hardship" activity tallies have been allocated to Load. Please explain why you have done this.

MPA/USPS-T13-96.   Please confirm that, with only minor exceptions, virtually all tallies for the "Point of Delivery" location were allocated to the Load or Street Support category. Please explain why you have done this.

MPA/USPS-T13-97.   Please confirm that, with the exception of Collection and Relay Box Locations, virtually all Del/Coll tallies were allocated to the Load or Street Support category. Please explain why you have done this.

MPA/USPS-T13-98.   Please explain why tallies with the activity of "No Access to Box" were allocated among the Drive, Load, and FAT Run Time categories.

MPA/USPS-T13-99.   Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the

"Load" category:

	Location	Delivery Type	Activity(ies)	Detail(s)
a.	N/A	Central	Del/Coll	Central Outside
b.	N/A	N/A	Del/Coll	Central Inside
d.	On Route	Central	N/A	Central Inside
e.	On Route or Park Point	Any Delivery Type (WT Codes)	Del/Coll or Finger @ Delivery	Any Receptacle Type (H Codes)
g.	On Route	Curb	Accountable	#1 Box
h.	On Route	Curb	Del/Coll	Drop to Customer
i.	On Route	Curb	Del/Coll	Walking
j.	On Route	Curb	Parcel	Drop to Customer
k.	On Route	Dismount	Accountable	Flat Receptacle
l.	On Route	Dismount	Finger @ Delivery	Walk Flat
m.	On Route	Dismount	Parcel or Accountable	Walk Flat
n.	On Route	Dismount	Walking	Walk Flat
o.	On Route	Park & Loop	Accountable	N/A
p.	On Route	Park & Loop	Del/Coll	Walk Flat
q.	On Route	Park & Loop	Del/Coll	N/A
r.	On Route	Park & Loop	Finger @ Delivery	Walk Flat
t.	Point of Delivery	Central	Accountable	Flat Receptacle
u.	Point of Delivery	Any Delivery Type (WT Codes)	Parcels, Parcel or Accountable	N/A
v.	Point of Delivery	Central	Del/Coll	Drop to Customer
w.	Point of	Any Delivery	Del/Coll	N/A

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	Delivery	Type (WT Codes)		
x.	Point of Delivery	Central	N/A	Central Inside
y.	Point of Delivery	Any Delivery Type (WT Codes)	N/A	N/A
z.	Point of Delivery	Central, Dismount, Foot, or Park & Loop	Setup	Vehicle Code (K Codes)
aa.	Point of Delivery	Central	Travel B/t Dlvr.	Central Outside
bb.	Point of Delivery	Central	Walking	Central Inside or Outside
cc.	Point of Delivery	Central	Walking	Walk Flat
dd.	Point of Delivery	Curb	Del/Coll	1 Handed Slot
ee.	Point of Delivery	Curb	Del/Coll or Finger @ Delivery	Drop to Customer
ff.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
gg.	Point of Delivery	Any Delivery Type (WT Codes)	Travel B/t Dlvr.	Walk or Vehicle Codes (K Codes)
hh.	Point of Delivery	Curb	Travel B/t Dlvr.	Walk Flat
ii.	Point of Delivery	Dismount	Parcel or Accountable	Walk Codes (K Codes)
jj.	Point of Delivery	Dismount	Delay (D Code)	Gang Box
kk.	Point of	Dismount	Travel B/t Dlvr.	Any Receptacle Type (H

				Codes)
ll.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll.	Walk Code (K Codes)
M m.	Point of Delivery	Park & Loop	Travel B/t Dlvr.	1 Hand Slam
nn.	Vehicle	Curb	Del/Coll or Finger @ Delivery	Receptacle Codes (H Codes)
oo.	Vehicle	Central, Dismount, Park & Loop	Del/Coll or Finger @ Delivery	Receptacle Codes (H Codes)
pp.	Vehicle	Central, Dismount, Park & Loop	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
qq.	Vehicle	Curb	Del/Coll	Drop to Customer
rr.	Vehicle	Curb	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
ss.	Vehicle	Dismount	Parcel	Drop to Customer
tt.	Vehicle	Dismount	Travel B/t Dlvr.	Drop to Customer

MPA/USPS-T13-100. Please confirm that you assigned the "Street Support" category to all tallies with:

    (a)   Dock, Gas Station, In Unit Walking, PBL, or Relay Box locations.

    (b)   Loading or Unloading activity, regardless of location.

    (c)   Materials Handling activity detail.

MPA/USPS-T13-101. Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the "Street Support" category.

Location	Activity	Activity Detail

Dock	Travel B/t Dlvr	LLV
Misc, Park Point, or Vehicle	Loading	Vehicle Codes (K Codes)
Misc	Setup	Walking Push Cart
On Route	Setup	Walking
Park Point, Vehicle	Setup	N/A
Park Point, Vehicle	Unloading	Vehicle Codes (K Codes)
Vehicle	Loading	N/A
Vehicle	Travel B/t Dlvr	Walk Flat
Vehicle	Travel B/t Dlvr	Vehicle Codes (K Codes)

MPA/USPS-T13-102.　　Should the out-of-office time for each route-day, particularly those for motorized carriers, begin with some sort of Street Support (i.e., "Loading/Setup" or Travel to First Delivery activity) and end with some sort of Street Support (i.e., "Return to Unit" or "Unloading" activity) time? Please explain. If a route-day does not begin or end in this manner, what does it indicate?

MPA/USPS-T13-103.　　Should the out-of-office time for each route-day contain some Personal or Administrative (PBL) time? Please explain. If a route-day does not include any PBL time, what does it indicate?

MPA/USPS-T13-104.　　For out-of-office time, if there is no lengthy break in the tally times (one every six minutes or so) for lunch breaks, what does that indicate? Please explain.

MPA/USPS-T13-105.　　For the "Dock" location, there are "set up" activities. Appendix D describes "setup" as "relocating mail form (sic) rear of vehicle to front, loading satchel."

(a) Please explain what the data collectors were observing when they indicated "setup" on the Dock.

(b) Please explain how "setup" differs from "loading" on the Dock.

MPA/USPS-T13-106.　　There Park Point location tallies which indicate central,

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curbline, or dismount delivery types. Per Appendix D, you state that the "Park Point" location applies to park and loop "routes". Please clarify, what were the data collectors indicating when they assigned the "Park Point" location?

MPA/USPS-T13-107. There is a "Relay Box" location tally that has a "Wait 4 Collection" activity. Please explain what specific activity the data collectors were observing when they took this tally.

MPA/USPS-T13-108. There are a lot of vehicle location tallies for dismount deliveries with "setup" activity. Per Appendix D, you state that setup is "relocating mail form [sic] rear of vehicle to front, loading satchel." But, Appendix D also states that Dismount is serving one or more customers by dismounting and without use of a satchel. Please explain what specific activity the data collectors were observing when they took these tallies.

MPA/USPS-T13-109. For the "In Unit Walking" locations, the activity is "loading" which is described in Appendix D as "putting mail into vehicle". Please explain what specific activity the data collectors were observing when they took these tallies.

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