

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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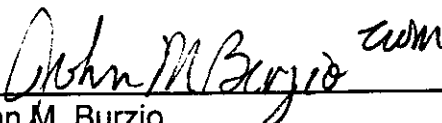
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
LLOYD RAYMOND (ADVO/USPS-T13-24-59)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Lloyd Raymond. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,



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Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Thomas W. McLaughlin

March 15, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS RAYMOND

ADVO/USPS-T13-24. In response to ADVO/USPS-T12-3, witness Baron states that he discussed with you:

“the need to define load time as time that begins after the carrier has completed accessing a delivery stop, and to define the activity of walking to or driving up to a delivery stopping point as something other than load time.”

Please confirm that this discussion took place after the survey data in your study had been collected.

ADVO/USPS-T13-25. You have stated that no written instructions or training manuals were provided to the data collectors. Please provide the following documents with respect to any oral training or instructions given to data collectors on how to identify, categorize, and record the specific carrier activities they observed:

- (a) Copies of all instructional presentation materials (including but not limited to outlines, overhead slides, videos, charts, definitions or descriptions of carrier activities, schematic tables, etc.) used in training or instructing the data collectors.
- (b) Copies of all instructional scripts, outlines, notes, etc. provided to and/or used by the instructors in making their instructional presentations to data collectors.

If no such documents ever existed, please so state. If there were such documents but they are no longer available, explain why this documentation was not maintained.

ADVO/USPS-T13-26. In your response to MPA/USPS-T13-15, you state that “any additional Phase 2 contractors” over and above the 24 initially trained were placed with the two person teams and received on the job instruction and instruction from the Postal Service Subject Matter Expert.” Please provide:

- (a) The number of days a new data collector spent doing on-the-job training.
- (b) For each additional data collector, the code of the data collector(s) that trained him or her.
- (c) Any supporting evidence that such training took place.

ADVO/USPS-T13-27. Please refer to your response to MPA/USPS-T13-16, listing data observers and the routes they worked on. In the summary on pages 1-2, you list three Phase 2 data collectors (coded OBS27, OBS 51, and OBS52) for which no routes are shown in the route-assignment detail on pages 6-15. Conversely, you list three data collectors in the detail section (coded OBS59-OBS61) that are not listed in the summary. Please explain these discrepancies, and provide any missing data and/or corrections to your response.

ADVO/USPS-T13-28. With respect to your response to MPA/USPS-T13-16:

- (a) How many data collectors were employed at one time in Phase 1 (i.e., the standard complement of data collectors)?
- (b) Please indicate the level of turnover of data collectors in Phase 1 (i.e., the number of data collectors who worked during any part of Phase 1 that left before the completion of Phase 1).
- (c) Please identify the number of new data collectors who were brought in after the start of Phase 1 to fill vacancies.
- (d) How many data collectors were employed at one time in Phase 2?
- (e) Please indicate the level of turnover of data collectors in Phase 2.
- (f) Please identify the number of new data collectors who were brought in after the start of Phase 2 to fill vacancies.
- (g) Please provide any documents or information used in the recruitment or hiring of data collectors (e.g., recruitment ads, information sheets or job descriptions provided to prospective applicants, etc.) that describe the job and/or minimum applicant qualifications for the job.

ADVO/USPS-T13-29. The code numbers for data collectors in your response to MPA/USPS-T13-16 go up to number 58 (in the summary section) and up to number 61 (in the detail section). However, in both the summary and detail sections, there are a total of only 52 actual data collectors listed.

- (a) Please explain why there are gaps in the sequential coding of data collectors.
- (b) Do any of the gaps in observer codes represent individuals who collected data for this or any other project. If so, explain fully.

ADVO/USPS-T13-30. In your response to ADVO/USPS-T13-6, you state that "USPS Subject Matter Experts that were involved in the design of the data to be collected rotated between collection teams observing the collection process."

- (a) Were any of these individuals employees of the United States Postal Service? If so, please indicate the number of such individuals, their job titles, positions, and work responsibilities within the USPS.
- (b) If any of these individuals were not employees of the United States Postal Service, please indicate the entities these individuals were affiliated with, the number of such individuals by employer, and their job titles, positions, and work responsibilities.
- (c) How many such individuals rotated between collection teams during Phase 1? During Phase 2?
- (d) Explain precisely how these individuals were "involved in the design of the data."

ADVO/USPS-T13-31. In your response to MPA/USPS-T13-16, you provided a list of the data collectors (by observer code number) and the routes (by route code number) that each data collector worked on during the Phase 1 and Phase 2 data collections.

- (a) Please confirm that your list includes 618 observer/route entries, consisting of 177 entries for Phase 1 and 441 entries for Phase 2.
- (b) Please confirm that among those entries are a number of duplicate entries, specifically for the following observer/route combinations: OBS06 on route 9302, OBS07 on route 3703, OBS07 on route 3705, OBS07 on route 4732, OBS07 on route 4811, OBS08 on route 1595, and OBS13 on route 5566.
- (c) Please explain these duplicate entries. If they are duplicates, provide a corrected response to the interrogatory in hard copy and electronic spreadsheet format.
- (d) Please confirm that, after elimination of these duplicate entries, your list includes a total of 611 observer/route entries, consisting of 170 entries for Phase 1 and 441 entries for Phase 2.

If you cannot confirm any of the above, please explain why and provide the numbers that you believe to be correct.

ADVO/USPS-T13-32. At page 14 of your testimony, you state that Phase 1 included observations of 106 routes. However, at pages 2-5 of your response to MPA/USPS-T13-16, you list 148 unique routes (by "route code number") in Phase 1. With respect to this disparity:

- (a) Does this difference represent routes that were observed for some purpose but that were not included in the database submitted in this proceeding? If so,
 - (i) Please describe in full the purpose of these route observations.
 - (ii) Please explain why the observations were excluded from the database.
 - (iii) Please provide all data that was collected for these routes.
- (b) Is this disparity due to errors in the observer/route information you provided in response to MPA/USPS-T13-16? If so,
 - (i) Please provide a corrected version of your response in both hardcopy and electronic spreadsheet format.
 - (ii) Please separately identify, by observer code and route code, each erroneous entry and the corresponding correct entry.
- (c) If not fully explained in your above responses, please reconcile and explain this disparity, and provide any resulting corrections that need to be made to your testimony, your interrogatory responses, or the data submitted in this proceeding.

ADVO/USPS-T13-33. At page 14 of your testimony, you state that Phase 2 included observations of 234 routes. However, at pages 6-15 of your response to MPA/USPS-T13-16, you list 231 unique routes (by "route code number") that were observed in Phase 2. With respect to this disparity:

- (a) What is the correct number of Phase 2 routes for which observations are included in your database in this proceeding.
- (b) Is this disparity due to errors in the observer/route information you provided in response to MPA/USPS-T13-16? If so,
 - (i) Please provide a corrected version of your response in both hardcopy and electronic spreadsheet format.
 - (ii) Please separately identify, by observer code and route code, each erroneous or omitted entry and the corresponding correct entry.

- (c) If not fully explained in your above responses, please reconcile and explain this disparity, and provide any resulting corrections that need to be made to your testimony, your interrogatory responses, or the data submitted in this proceeding.

ADVO/USPS-T13-34. Please indicate how many separate entries or scans the data collector was required to make when recording a single observation. If the number of required scans varied depending on the type of observation, please explain the differences.

ADVO/USPS-T13-35. In your response to MPA/USPS-T13-16, you provided a list correlating the data collectors (by observer code number) with the routes observed (by route code number) during the Phase 1 and Phase 2 data collections. The following table, compiled from your response to MPA, shows the total number of different (unduplicated) routes identified for each data collector, by code number.

Observer	# of Routes
2	12
4	24
5	1
6	21
7	49
8	16
9	14
10	4
12	29
13	41
14	13
15	12
16	15
17	16
18	13
19	14
20	1
21	9

Observer	# of Routes
22	6
23	1
24	2
25	12
26	2
28	13
29	9
30	26
31	12
32	7
33	4
35	13
36	5
37	14
38	22
39	7
40	16
42	3

Observer	# of Routes
43	22
45	11
46	21
47	5
48	10
49	3
50	10
53	5
54	14
55	11
56	3
57	10
58	5
59	3
60	1
61	6

- (a) Please confirm that this table accurately lists for each data collector the total number of different routes identified for that collector in your response to MPA.
- (b) Please confirm that 22 of the 61 data collectors worked on fewer than ten routes, and that 16 worked on five or fewer routes.
- (c) If you cannot confirm either of the above, please explain why not, provide the figures that you believe to be correct, and explain the source and basis for your figures.

ADVO/USPS-T13-36. In response to ADVO/USPS-T13-11(a), requesting why two-person teams were required to collect the data, you state that "one would drive the car and the other would scan and collect data." In response to part (b) of that question, you state:

"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 also videotape outside activities for approximately 1/2 hour. The video would be shot at various times throughout the street time."

- (a) Please confirm that, except for the first sentence of this quote, all of the other activities described above were in addition to the task of scanning observations at six-minute intervals.
- (b) For each of the above described activities, please identify which ones were performed by the person who drove the car, and which ones were performed by the other person who scanned and collected data. If you do not know, please so state. Please provide documentation to support your answer.

ADVO/USPS-T13-37. At page 21 of Appendix C to your testimony, showing an example of an "observers barcode sheet used for the start of day," the first barcode entry shown is for "Observer," with the notation "Scan once per day."

- (a) Was this the first item scanned by a data collector?
- (b) Was this the only point in the scanning process where information identifying the data collector could be entered? Please explain.
- (c) Does this mean that on a given route-day for observations of a particular route, only one observer is identified for all tallies recorded on that route that day? Please explain.
- (d) During the course of the day in observing a particular route, did the two-person data collector teams ever switch roles (e.g., observer A scanning observations in the morning and observer B scanning in the afternoon; observer B doing scanning during portions of the day while observer A was doing other tasks or on personal break; etc.). If not, please explain

the basis for your conclusion that observers never switched roles, and reconcile your answer with your response to ADVO/USPS-T13-11.

- (e) If data collectors ever did switch roles in scanning observations during the course of the day, was there any procedure by which information identifying the new "observer" could be entered or recorded, either in the scanned database or otherwise? If so, please explain fully how this was accomplished.
- (f) For a particular observation (tally), is there any way to identify -- either from the database provided in this proceeding, or from available information which has not been provided -- which data collector actually recorded the observation if the collectors switched roles at any time after the start of the day?
- (g) Please provide all available information and data that would enable a matching of a specific observation (tally) with the data collector that *actually* scanned the observation (as opposed to the data collector recorded as the "Observer" at the start of the day). Please provide this information in both hard copy and database or spreadsheet format.
- (h) Please provide all documentation and instructions to the data collectors on how and when they were to enter or record information identifying which of them was actually scanning observations, and what to enter or record if they switched the scanning task after the start of the day.

ADVO/USPS-T13-38. Please confirm that the database you filed in LR-163 (and any subsequent updates or variations of that database) does not include any information identifying the observer codes for any observations.

- (a) If you cannot confirm, please identify specifically where this information can be found in the LR-163 database (or any other databases that have been filed in this proceeding).
- (b) Please provide a refiled database, in hardcopy and electronic spreadsheet format, that identifies for each record (tally) the data collector who *actually* recorded the data (by observer code number). If such information is not available, please so state, and explain why it is not available.
- (c) If there are no data or other information that would enable a matching of each tally with the data collector who *actually* recorded the tally, please provide a refiled database, in hardcopy and electronic spreadsheet format, that identifies any segments of observations for each route-day where the data collector (by observer code number) was different from

the one who was listed as the "Observer" at the start of the day. If such information is not available, please so state, and explain why it is not available.

- (d) If there are no data or other information that would enable a matching of either (i) each tally with the data collector who *actually* recorded the tally, or (ii) segments of tallies where the identified data collector is different from the one identified at the "Observer" at the start of the day, please provide a refiled database, in hardcopy and electronic spreadsheet format, that identifies for each route-day the data collector who was listed at the start of the day as the "Observer" (by observer code number). If such information is not available, please so state, and explain why it is not available.

ADVO/USPS-T13-39. In your responses to ADVO/USPS-T13-13 through 16, you state that:

- "No written instructions were provided" to data collectors on how to review for accuracy of scans and manual entries, and that "all training was on the job." [Question 13(a)]
- There were no written instructions given to supervisory individuals on how they were to review the accuracy of scans and manual entries. [Question 13(b)]
- "No records were maintained on the number of route days requiring change." [Question 13(c)]
- "No records were maintained on the number of individual observations changed." [Question 13(d)]
- A list of the types of changes that were forwarded to the central database managers is "not available." [Question 13(d)]
- "No instruction manuals exist" with respect to the central database managers. [Question 14(a)]
- "No summary records are available" with respect to changes forwarded from the site that were not implemented by the database managers. "The audit trail exists, but only in raw collected form." [Question 15(a)]
- There is no list of the "types of errors identified by the database managers" and "no summary records are available." "The audit trail exists but in raw collected form." [Question 15(c)]

- “No summary records are available” on the types of errors that were purged from the data set. “The audit trail exists but only in raw collected form.” [Question 16(a)].
- “No summary records are available” on the number of observations (tallies) that were purged. “The audit trail exists but only in raw collected form.” [Question 16(d)]
- “No summary records are available” on the number of route-days for which observations (tallies) were purged. “The audit trail exists but only in raw collected form.” [Question 16(e)]

With respect to these answers, please respond to the following:

- (a) Do these answers mean that the only way to determine and verify the number and kinds of changes that were made would be through a page-by-page review of the “raw collected” data forms? If your answer is anything other than “yes,” please explain fully.
- (b) Do the “raw collected” data forms identify all changes that were made, including both on-site changes and database manager changes? If not, please explain fully.
- (c) Have all of the raw collected data forms for all route-days of observations been retained? If so, please explain in detail how the data form files are organized.
- (d) Please state the total number of pages of “raw collected” data forms and/or other documents that are included in the “audit trail.” If you do not know, please provide your best estimate and state its basis.

ADVO/USPS-T13-40. In the Postal Service’s Objection to Advo Interrogatories ADVO/USPS-T13-2 and 19(c) to Witness Raymond, dated March 3, 2000, the Postal Service states that:

“In these many capacities, Mr. Raymond has worked under many contracts, each contributing to some extent to the generation of the data presented in witness Raymond’s testimony.”

With respect to each such contract that “contribut[ed] to some extent to the generation of the data presented in witness Raymond’s testimony,” please provide the following:

- (a) A full description of the original work plan proposed to the USPS for each contract.

- (b) The statement of work and list of deliverables for each such contract.
- (c) List of reports, analyses, and all other documentation prepared on each contract.
- (d) Contract initiation and completion dates for each contract.
- (e) An explanation of the manner in which the contract "contribut[ed] to some extent to the generation of the data presented in witness Raymond's testimony."

ADVO/USPS-T13-41. With respect to your response to MPA/USPS-T13-1 and the Foot Access, Curbline Access, and the Load Time Variability Tests:

- (a) When were you first made aware of these data collections?
- (b) What knowledge do you have of these data collections?
- (c) What materials have you read and reviewed on these data collections?

ADVO/USPS-T13-42. In your response to MPA/USPS-T13-22, you state that "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."

- (a) Typically, prior to leaving the unit for the route, how many times does a carrier go between the inside of the unit and his vehicle?
- (b) What are the USPS requirements as to when to clock to the street?
- (c) Did the data collectors make the decision as to when "outside activities" began? If not, who did?
- (d) If the data collectors made the decision as to when "outside activities" began, how were they instructed to choose between the two options you gave them?

ADVO/USPS-T13-43. In your response to MPA/USPS-T13-22, you state that "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."

- (a) Typically, after arriving at the unit from his route, how many times does a carrier go between the vehicle and the inside of the unit?
- (b) What are the USPS requirements as to when to clock to the street?
- (c) Did the data collectors make the decision as to when "outside activities" began? If not, who did?
- (d) If the data collectors made the decision as to when "outside activities" began, how were they instructed to choose between the two options you gave them?

ADVO/USPS-T13-44. Please identify the sites (a) originally selected by the USPS and (b) those selected at random, that were ultimately unobserved:

ADVO/USPS-T13-45. Please refer to your response to MPA/USPS-T13-31 where you state that the term "Engineered Standard Implementation test site" means a location/site used to test the engineered methods, standards and applications that were developed." However, your testimony at page 8, line 14 appears to use the term to indicate a Phase 2 data collection location.

- (a) Were the engineered methods, standards and applications developed prior to the Phase 2 data collection? Please explain.
- (b) Were other observations or tests occurring at the same time that the LR I-163 data were being collected? If so,
 - (i) Please describe the nature of such other observations or tests and the general type of information collected.
 - (ii) Please explain the relationship between the other observations or tests and the LR I-163 data collection effort and data?
- (c) Were any of the Phase 1 locations also "Engineered Standard Implementation test sites?"

ADVO/USPS-T13-46. Once it was determined that 30-day studies were not possible, what rules were used to determine the calendar days actually studies and how many days a multiple-day study would take?

ADVO/USPS-T13-47. Please refer to your response to MPA/USPS-T13-40 concerning correction of incorrect barcode scans out in the field.

- (a) Which observer maintained the comments log – the one that handled the barcode reader or the other individual who was driving the car?
- (b) Are the original marked up reports and videotapes still available?
- (c) During this specific data collection, how long (in hours) was the typical workday for your data collectors, including all preparation time before the start of data collections and time spent after the observations in analyzing and correcting the day's observations?

ADVO/USPS-T13-48. Please refer to your response to MPA/USPS-T13-43 concerning other quantitative data collected during the Engineering Standards project. Of the two data collectors in the team, which data collector manually entered the qualitative data – the one taking the every-six-minute barcode readings or the other one who was driving the car?

ADVO/USPS-T13-49. Please explain why the barcodes on the barcode sheet shown in Appendix C were not presented sequentially.

ADVO/USPS-T13-50. Please refer to your response to MPA/USPS-T13-43 concerning other quantitative data collected during the Engineering Standards project.

- (a) Were quantities of DPS, AM letters, AM flats, parcels, accountables, SPRs, DAL cards, DPS missorts, DPS out of sequence, UBBM, missorts measured for every observation day?
- (b) Explain how each of the above (a) was measured every day.
- (c) Were PM volumes also measured or were they already included in the above (a) volumes?
- (d) Explain how the weight of a loaded satchel was measured.
- (e) What was the frequency of weighing satchel loads.
- (f) Does "delivery point" mean number of addresses, number of delivery receptacles, number of locations for delivery receptacles, or something else?
- (g) What does number of "park points" include: only park & loop park points, number of typical park points for park & loop/dismount/central deliveries, park points for (non-typical) deviation deliveries (e.g., for non-routine

parcel drops, pickups from other units or customers, etc.), or something else?

- (h) Were the number of actual (covered) deliveries or stops also collected each route-day? Please provide any such data by route-day.
- (i) Were average distances between "deliveries" or "stops," average distances for "accesses," average looping distances, or any other outside distances along the route measured in some way? If so, how?
- (j) Was distance or travel time between unit and beginning/end of route measured in some way? If so, how?

ADVO/USPS-T13-51. Please refer to your response to MPA/USPS-T13-51 concerning a definition of the term "outlier."

- (a) Provide any decision rules you had concerning the identification of outliers.
- (b) Identify all examples of outliers of which you are aware.
- (c) You state that a lunch break scan at the end of the day would be considered an outlier. What were the standard times for lunch breaks? For example, if there is no break in the middle of the day, would that be considered an outlier? Please explain.
- (d) You state that six vehicle inspection scans in a row would be an outlier. Please provide some examples of observations which indicate a vehicle inspection is occurring.
- (e) Is vehicle inspection considered to be an "out-of-office" activity? Please explain.

ADVO/USPS-T13-52. In response to MPA/USPS-T13-55 you state that the number of possible delivery points by type and type status are not available. However, in response to MPA/USPS-T13-43 you state that the data collectors manually entered information on number of delivery points by type (from the 3999X form).

- (a) What is the distinction you are making between possible delivery points by type and the number of delivery points by type from the 3999X form? Please explain.
- (b) Please provide in hardcopy and electronic spreadsheet format the number of delivery points by type from the 3999X form, for each route in your database.

- (c) Please provide the date(s) of the 3999X form(s) for each route (route/day).

ADVO/USPS-T13-53. In response to OCA/USPS-T13-1, you provide a method for determining sample size for the number of time studies that was the guide for the number of route studies.

- (a) Please explain and provide your calculations for determining number of routes to be studied, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.
- (b) Please identify the "task(s)" that were the subject of the sample size calculations.

ADVO/USPS-T13-54. In response to OCA/USPS-T13-1(a), you state that you did "check to see if the routes, the mix of delivery points, gender, and age of carriers that we had studied matched the Postal Service percent distributions." Please provide those comparisons and analyses, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

ADVO/USPS-T13-55. In response to OCA/USPS-T13-1(b), you indicate that you compared the data from the random routes to the USPS selected routes and found that the "data should be considered as random and representative of the population."

- (a) Do you mean that you compared the LR I-163 data from the routes of the units chosen at random to that from the routes of the units selected by the USPS? If not, please identify the data compared and the routes selected by the USPS.
- (b) Do you mean that you believe the data from the random routes are representative of the population of routes in the USPS system? Please explain and reconcile this with your response to OCA/USPS-T13-6 where you state that "the randomly observed routes [from the randomly chosen sites] are a respectable sample but is not large enough to represent the total population of routes."
- (c) Please provide the comparisons and analyses to which you refer, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

ADVO/USPS-T13-56. Did you conduct any analyses of the LR-163 data to determine whether it was representative of the system of routes on an annual basis? If so, please provide the analyses, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

ADVO/USPS-T13-57. In response to OCA/USPS-T13-3, you state that you performed "analysis of data from the test sites after implementation."

- (a) Was this analysis related to studies or analyses performed by other researchers or related to the effect of monitoring on carrier activities? Please explain.
- (b) If any of this analysis was specific to the work sampling data in LR I-163, please provide the analysis, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

ADVO/USPS-T13-58. Please refer to your response to MPA/USPS-T13-9:

- (a) Explain fully what a "predetermined time system" is. If there is more than one type of "predetermined time system," explain which type you used.
- (b) Explain specifically how the "predetermined time system" was used to develop or generate the LR I-163 work or activity sampling data or, alternately, how the LR I-163 data were used to develop the "pre-determined time system."
- (c) Explain specifically how the "activity/methods descriptions and times" were used to develop or generate the LR I-163 work or activity sampling data or, alternately, how the LR I-163 data were used to develop the "activity/methods descriptions and times."
- (d) Explain how the videotapes were used to develop or generate the LR I-163 work or activity sampling data.
- (e) Explain how the LR I-163 work sampling data were used to support "in-depth analysis and validation of work methods" (p. 5, lines 14-15, USPS-T-13).
- (f) When you state that "analysis were performed on the data collected," are you discussing the LR I-163 work or the activity sampling data? If so, please provide all analyses from that data, including documentation and sources, with sufficient explanation for someone to follow and replicate your results.

ADVO/USPS-T13-59. Please refer to your response to MPA/USPS-T13-25. In your response you state that "In my opinion, we achieved this goal [of reducing any bias]."

- (a) Please specify the type of bias were you looking for?
- (b) Provide all analyses which you conducted on the extent of any bias.