

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

RECEIVED

MAR 16 3 01 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

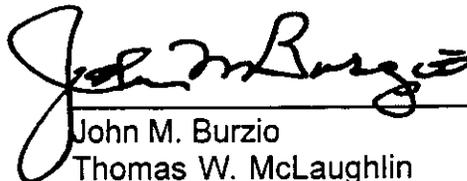
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
LLOYD RAYMOND (ADVO/USPS-T13-60-73)

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.

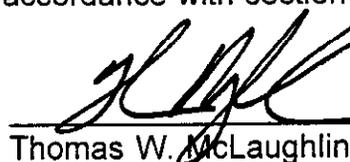
Respectfully submitted,



John M. Burzio  
Thomas W. McLaughlin  
Burzio & McLaughlin  
1054 31st Street, N.W.  
Washington, D. C. 20007  
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 16, 2000

**ADVO, INC. INTERROGATORIES TO USPS WITNESS RAYMOND**

**ADVO/USPS-T13-60.** In your response to ADVO/USPS-T13-8, you provided “a copy of the email sent to the regions by the USPS” that requested the regions to select cities and delivery units that would be included in your data collection survey. The e-mail message instructs the regions that the delivery units to be chosen “should have a high DPS volume.” With respect to this instruction:

- (a) Were you involved in any way in the decision to focus the survey on delivery units that have a “high DPS volume?” If so, please describe your involvement.
- (b) Provide copies of all documents (memoranda, analyses, e-mail communications, correspondence, etc.) that discuss or explain the reasons for the determination to focus the survey on “high DPS volume” delivery units.
- (c) Did you or anyone else involved with the design of this survey consider whether a focus on “high DPS volume” delivery units might bias the survey results, or otherwise produce results that are not representative of “low volume” or “average volume DPS” delivery units or the system of delivery units and carrier routes?
- (d) Please provide copies of all documents that were considered or relied upon in making the determination to focus on “high DPS volume” units that discuss, analyze, or relate to the potential for bias due to that determination.

If you do not have the requested documents and information or are unable to respond to any part of the above, please re-direct this request to the appropriate Postal Service witness. If documents covered by this request never existed, please so state. If documents covered by this request existed at one time but are no longer available, please so state, and explain why they are no longer available.

**ADVO/USPS-T13-61.** Please provide the information requested below with respect to the routes that were observed during your study. If information is not available in precisely the format or detail requested, please provide the best available information most closely corresponding to the information requested, and explain the source of the information (e.g., if volume information is not available for the specific day a route was observed, please provide average daily volumes for that route).

- (a) For each of the observed routes in delivery units that were selected by the regions, please provide the following information:
  - (1) The total volume of DPS mail on the day the route was observed, and the average volume of DPS mail per stop and delivery.
  - (2) The total volume of non-DPS mail on the day the route was observed, and the average volume of non-DPS mail per stop and delivery.
  - (3) The total volume of all mail on the day the route was observed, and the average volume of mail per stop and delivery.
- (b) For all routes in delivery units that were selected by the regions, please provide the information requested in (a)(1)-(3) above on an aggregated average basis (e.g., the average DPS volume per route for all observed routes in units selected by the regions).
- (c) For each of the observed routes in delivery units that were *not* selected by the regions, please provide the information requested in (a)(1)-(3) above.
- (d) For all routes in delivery units that were *not* selected by the regions, please provide the information requested in (a)(1)-(3) above on an aggregated average basis (e.g., the average DPS volume per route for all observed routes in units not selected by the regions).

ADVO/USPS-T13-62. Please refer to your response to MPA/USPS-T13-16, where you provide a list that correlates data collectors with observed routes.

- (a) Please confirm that your list identifies a total of 371 routes that were observed.
  - (b) Please confirm that your list identifies (by observer code number) a total of 52 different data collectors.
  - (c) Please confirm that 246 of the 371 routes shown on your list, comprising 66% of the total routes, identify a single data collector.
  - (d) Please confirm that 78 of the 371 routes shown on your list, comprising 21% of the total routes, identify two data collectors.
  - (e) Please confirm that the remaining 47 of the 371 routes shown on your list, comprising 13% of the total routes, identify three or more data collectors.
-

If you cannot confirm, please explain why, provide the numbers that you believe to be correct, and show how you derived your numbers. If the information in your response to MPA/USPS-T13-16 is incorrect, please provide a corrected response, both in hard copy and electronic spreadsheet format.

USPS-T13-63. The following table attempts to construct information on your site selection and samples, from the sources listed below. Please fill in the missing figures, make any necessary corrections to the figures shown, and reconcile any differences with the data noted below from your testimony:

	Phase 1	Phase 2 New	Phase 2 From Phase 1	Total
Total Observed Sites	40 (i)	21	2	(v)
Random Observed Sites	9 (ii)	2	0	11
USPS Selected Observed Sites	31	19	2	42
USPS Selected but Unobserved Sites	?	5 (iv)	?	?
Randomly Selected but Unobserved Sites	(iii)	?	?	?

NOTES: The above figures for Phase 1 are from MPA/USPS-T13-26, and for Phase 2 are from MPA/USPS-T13-33. These figures differ from figures presented in USPS-T-13 in the following respects:

- (i) Page 14 of the testimony states 32 total observed sites.
- (ii) Footnote 5 on page 8 of the testimony states that Phase 1 one-day studies were performed at 8 of the 10 randomly selected site
- (iii) This depends upon whether page 8 of testimony or the Response to MPA/USPS-T13-26 is correct.
- (iv) Page 8 of the testimony indicates 5 out of 10 test sites were implemented, MPA/USPS-T13-33 states that there were 2 randomly selected but unobserved sites. What is the split between new and from Phase 1?

- (v) Page 14 of the testimony shows a total of 53 observed sites (32 Phase 1 plus 22 Phase2 minus 1 observed in both phases). This does not fit with the data given in response to MPA/USPS-T13-26 and 33.

USPS-T13-64. The following table lists information on your route selection and observation information, from pages 9 and 14 of your testimony. Please fill in the missing figures, make any necessary corrections to the figures shown, and reconcile any differences with both (i) the data noted below from your testimony and (ii) the data in your response to MPA/USPS-T13-16:

	Phase 1	Phase 2	Total
Total Observed Routes	106	234	340
Random Observed Routes	?	62	?
USPS Selected Observed Routes	?	?	?

USPS-T13-65. The following table lists information on your route-day samples and observation information, from pages 9 and 14 of your testimony. Please fill in the missing figures, make any necessary corrections to the figures shown, and reconcile any differences with the data noted below from your testimony:

	Phase 1	Phase 2	Total
Total Route-Days Observed	237	607	844
Days from Random Routes	?	76	100
Days from USPS Selected Routes	?	?	744

USPS-T13-66. When the data in LR I-163 are listed by route-day, there appear to be 861 route-days, consisting of 845 route-days with dates, plus 16 sets of undated tallies (44 tallies total) belonging to 16 different routes (each of which was a multiple-day route). Please provide the following:

- (a) A confirmation that there are 16 undated sets of tallies.
- (b) A full explanation of what these sets represent and how they occurred.
- (c) Identification of which route-days they belong to.

- (d) On page 14 of your testimony, you state that there were 844 route-days of street Information. Please reconcile that figure with the figures listed above.

USPS-T13-67. On Page 22 of your testimony you show sixteen Level 11.1 (Outside Personal or Administrative) barcodes. On page 25, however, you indicate four Personal or Administrative codes (N/A, Personal, Break, Union). In the data in LR I-163, there are seven Level 11.1 codes used (Forms, N/A, Other-Specify, Subject Break, Subject Personal, Supervisor Instruction, and Union).

- (a) Please confirm that the tallies in LR I-163 were all taken during times when the carrier was compensated (as opposed to personal, uncompensated time).
- (b) There is a Level 11.1 for a lunch break (A03) but this code is not found in the database. How did you identify the time period over which the carrier took lunch?
- (c) Please explain how lunch breaks can be identified in the LR I-163 data. If there are tallies indicating lunch, please provide them for each route-day.
- (d) The lunch break itself is not compensated, how much time is permitted for that break? If it varies, please explain.
- (e) There are tallies for Break and Personal time. How much time is permitted for those requirements? If it varies, please explain.
- (f) Are there uncompensated Break or Personal times permitted while the carrier is out of office?
- (g) If there are uncompensated Break or Personal times, please explain how you identify those time periods. If there are tallies indicating uncompensated Break or Personal time, please provide them for each route-day.

USPS-T13-68. With respect to total compensated carrier time:

- (a) Please explain fully how to identify, from the LR-163 database, the total compensated carrier time spent out-of-office for each route-day. If that information is not in the database contained in LR-163, please provide those times for each observed route-day, in both hard copy and electronic spreadsheet format.

- (b) Please provide the total compensated carrier time spent in-office for each observed route-day, in both hard copy and electronic spreadsheet format.

USPS-T13-69. For each of the types of tallies identified below from the LR-163 database, please explain fully how these tallies occurred:

- (a) 492 tallies with the same time and observation information;
- (b) 20 tallies with the same time but different observation information;
- (c) 1,325 tallies that are taken within 5 minutes of another tally, including 241 tallies taken within 3 minutes of another tally;
- (d) Tallies that are greater than 6 minutes apart but do not appear to be the result of some sort of uncompensated break (e.g., 295 tallies that are 11-12 minutes after another tally, and 610 tallies that are 12-15 minutes after another tally).

USPS-T13-70. Comparing Delivery Type Status (Level 11.3) to Activity Detail (Level 11.4.1), please explain:

- (a) Why there are some Residential Inside Delivery Type Status tallies with Central Outside or Gang Box Activity Details.
- (b) Why there are some Residential Outside Delivery Type Status tallies with Central Inside Details.
- (c) Why there are some Business Outside Delivery Type Status tallies with Central Inside Details.

USPS-T13-71. Why are there #1 and #1-1/2 boxes, 1- and 2-handed slots, and customer drops associated with central delivery type tallies? How do these deliveries differ from foot, park & loop, and dismount deliveries with the same activity details (receptacle codes)?

USPS-T13-72. The LR-163 database includes route-days where there are neither "Loading" or "Travel to First Delivery" tallies, and route-days where there are neither "Unloading" or "Return to Unit" tallies (i.e., the day begins or ends with Drive, FAT/CAT, or Load activities). Please explain them.

USPS-T13-73. In the data provided in response to MPA/USPS-T13-26, there are gaps in the CY codes, (CY1, 12, 13, 24, and 25 are missing). Please provide an explanation of what the missing CY codes represent and explain why they are missing.