

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

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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-T13-74-100)

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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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 20, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS RAYMOND

ADVO/USPS-T13-74. As part of either the Delivery Redesign project, the Engineered Standards project, or the specific data collection project that is the subject of your testimony, were any data collected or analyses undertaken to study or identify the relative characteristics (such as but not limited to average mail volume per route, per stop, or per delivery) of delivery units or routes with high DPS volumes, compared to those with average or low DPS volumes? If so, please provide all such data, analyses, documents and information.

ADVO/USPS-T13-75. The LR-163 database contains numerous central *inside/central outside activity detail tallies for park & loop, foot, and dismount delivery types*. How and why are these tallies different from central delivery type tallies?

ADVO/USPS-T13-76. Please refer to your response to UPS/USPS-T13-7. For the tally in Row 9 of your response,

- (a) Please elaborate every reason you have for including it in Load time rather than some other time.
- (b) Please provide all documentation you have available that shows that the Location should be Point of Delivery rather than Vehicle.

ADVO/USPS-T13-77. Please refer to your response to UPS/USPS-T13-7. If the carrier was on his route and deviated to deliver a parcel, please explain fully why the Location would then be recorded as "Other Route."

ADVO/USPS-T13-78. For the "Central Inside" receptacle detail (Code H12), please identify the types of receptacles and/or drops that could be encompassed within that code (e.g., drop to a central mailroom, one or more banks of central receptacles, groupings of individual receptacles that could also be used as single delivery receptacles).

ADVO/USPS-T13-79. Is a "flat receptacle" always associated with some other type of receptacle? Please explain.

ADVO/USPS-T13-80. In your response to MPA/USPS-T13-15, which asked you to describe how data collectors were selected and trained, you provided the following information with respect to Phase 2 data collectors:

- Three of the Phase 2 data collectors participated in Phase 1 data collections.
- Six new data collectors received on-the-job training for three weeks during the Phase 2 data collections.
- Eighteen new data collectors received on-the-job training for two weeks during the Phase 2 data collections.

With respect to this response, please answer the following:

- (a) The above three categories total up to 27 data collectors. However, your response to MPA/USPS-T13-16 lists 47 data collectors (by observer code number) in Phase 2. Please state the correct total number of data collectors that participated in any part of the Phase 2 data collections.
- (b) Does this mean that an additional 20 data collectors were hired sometime after the 27 identified above? If not, please indicate the correct number of additional data collectors hired.
- (c) Please explain how much on-the-job training (in days or weeks) these last 20 data collectors received. If the amount varied by individual, please indicated the range of training.
- (d) Are the "observer code numbers" arranged in the order of hire; e.g., do the last 20 observer code numbers correspond to the 20 last-hired data collectors in (b) above? If not, provide a list that groups observer code numbers by training category.

ADVO/USPS-T13-81. With respect to the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status codes, please

- (a) Confirm that, although the barcode descriptions in Appendix C (page 22) call them "route" codes, these codes relate to a delivery or set of deliveries rather than the entire route. If this is incorrect, please explain fully.
- (b) Explain how these two types of codes were identified for a "Point of Delivery" location.
- (c) For "Point of Delivery" location, explain where and when the information was gathered on the delivery types/delivery status for a route (i.e., was it decided as each observation was made or taken from an already filled-

out form? Would it depend upon whether the carrier had an atypical delivery to make to a certain address?).

- (d) For all other (Level 10) location codes, provide the information requested in (b) and (c) above.

ADVO/USPS-T13-82. Please refer to the PS Form 3999X "Examination of Letter Carrier Worksheet" presented in Appendix E to your testimony.

- (a) Please provide the route observers' definitions of the following delivery types from Form 3999:
 - Type 1 residential deliveries
 - Type 2 residential deliveries
 - Type 3 residential deliveries
 - Type 4 residential deliveries
 - Type 5 business deliveries
 - Type 6 business deliveries
 - Type 7 business deliveries
 - Type 8 business deliveries
- (b) For each of the delivery types in (a), please provide any systematic instructions provided to the observers with respect to the type of receptacles or other delivery conditions that might be expected.

ADVO/USPS-T13-83. Provide a cross-tabulation of the delivery type/delivery type status codes with the Form 3999 data you collected in the format shown below:

Delivery Status	Delivery Type	Res Type 1	Res Type 2	Res Type 3	Res Type 4	Bus Type 5	Bus Type 6	Bus Type 7	Bus Type 8
Residential Outside	Central								
	Curb								
	Dismount								
	Foot								
	Park&Loop								
Residential Inside	Central								
	Curb								
	Dismount								
	Foot								
	Park&Loop								
Business Outside	Central								
	Curb								
	Dismount								
	Foot								
	Park&Loop								
Business Inside	Central								
	Curb								
	Dismount								
	Foot								
	Park&Loop								

ADVO/USPS-T13-84. With respect to LR I-220 (Engineered Standards Book of Forms/Pictures) and LR I-221 (Engineered Standards Book of Barcodes), please confirm:

- (a) There are a number of photographs of mail equipment and mail receptacles in LR I-220, but, with the possible exception of "gang box," there are no photographs or other graphics that specifically identify a receptacle type as it relates to a receptacle type description or (Level 11.4.1, Delivery Details H) code, as described in the barcode book.
- (b) There are no photographs in LR I-220 that explicitly identify with or relate to any Level 10 Location or Level 11.4 Outside Activity codes, as described in the barcode book.

ADVO/USPS-T13-85. Please refer to your Appendix A, "Delivery - Basic," which provides a flowchart of carrier activities and route characteristics that were used to develop the barcode method.

- (a) By barcode method, do you mean the work/activities sampling process or did the barcode method extend to other projects your organization was also performing (i.e., the time studies, methods analyses)? Please explain.
- (b) Were flowcharts such as these given to the data collectors/observers as part of their training process (e.g., something like this was included in LR I-220, the Engineering Standards Book of Forms/Pictures)? Please explain.
- (c) Please confirm that the code numbers on the flowchart in Appendix A were not included in the barcode information in your Appendix C or anywhere else in your testimony, but were only provided later when you filed LR I-221. If this is incorrect, please explain.

ADVO/USPS-T13-86. Please refer to your Appendix A, "Delivery - Basic," which provides a flowchart of carrier activities and route characteristics that were used to develop the barcode method.

- (a) Please confirm that for Central Inside, Central Outside, and Dismount deliveries there are no words or codes describing the carrier activities of walking to and from vehicle (at a park point) or between delivery points. If this is incorrect, please explain fully.
- (b) Please confirm that for Park & Loop deliveries there are no words or codes describing the carrier activities of walking to and from vehicle (at a park point), along route, or between delivery points. If this is incorrect, please explain fully.
- (c) Please confirm that for Foot deliveries there are no words or codes describing the carrier activity of walking to or from relay point, along route, or between delivery points. If this is incorrect, please explain fully.
- (d) Please confirm that for any delivery type, there are no words or codes describing the carrier activity of walking from a routine delivery point to make a special delivery of an accountable or parcel. If this is incorrect, please explain fully.

If you cannot confirm any of the above, please explain why not.

ADVO/USPS-T13-87. With respect to the Videx TimeWand II scanner, please provide the following:

- (a) The program listing and all programming documentation for the scanner.
- (b) Identification of whether the individual who programmed the scanner was you, a regular employee of your firm, or some other individual.
- (c) Full information on whether the scanner was programmed so that certain codes could not be used with certain other (incompatible) codes.
- (d) Confirmation that once the Videx II scanner's data file was opened (for an observation), the scanner would permit codes only in hierarchical order (i.e., a higher level code could not precede a lower level code). If this is incorrect, please explain.
- (e) Confirmation that the Videx II scanner would not permit a level from being omitted during an observation. If this is incorrect, please explain.
- (f) Confirmation that the Videx II scanner would prompt the data collector (on the LCD) for each Level's scan. If this is incorrect, please explain.
- (g) Information on precisely when the scanner's data file was opened and the clock reading was made (was it right after it beeped or when the data collector scanned the first barcode?).
- (h) The estimated time required by the data collector to scan one full observation.

ADVO/USPS-T13-88. With respect to the Videx TimeWand II, please provide:

- (a) The name and address of its manufacturer or supplier.
- (b) Any additional model or identifier numbers or names.
- (c) If available, an operational scanner (to be filed at the Commission for viewing and handling).

ADVO/USPS-T13-89. For the team of two individuals that collected data for a route-day, please explain:

- (a) Were all "Study" and "Work Sample" data (indicated as requiring collection in LR I-221) input into the same Videx TimeWand II scanner or

were both individuals on the team scanning different kinds of data on two separate scanners during the day?

- (b) Were the Level 9 (Inside and Outside) event quantities (indicated as requiring collection in LR I-221) physically counted by the individual with the Videx TimeWand II scanner or by the other individual?
- (c) Were any other data (not included as barcodes in LR I-221) also being scanned into the same Videx TimeWand II scanner that was being used to scan the work/activity sampling data? If so, please identify and explain.
- (d) Did the individuals on the team sometimes switch assignments over the course of a day? If so, and there was some routine involved, please explain fully.
- (e) Were the data collectors involved in timing any activities during the data collection? If so, please explain what activities were timed, how those activities were timed, and how the information was recorded.

ADVO/USPS-T13-90. With respect to LR USPS I-221 (Engineered Standards Book of Barcodes), please provide the following:

- (a) A confirmation that these are all the barcodes used in the activity sampling project. If they are not, please provide all the barcodes.
- (b) A confirmation that the barcodes on the second page of codes are the Level 7 codes. If this is not correct, please explain and provide the Level 7 codes.
- (c) A full explanation of and definitions for the barcodes on the second page of the barcode book.
- (d) For each barcode, identify and explain:
 - (i) whether it was used to develop work/activity sampling data (regardless of whether the data are included in LR I-163), data for some other purpose, or data for multiple purposes.
 - (ii) whether it would be scanned by the individual with the Videx II scanner and collecting the work/activity sampling data, or by another individual handling another scanner (collecting something other than activity sampling data).

ADVO/USPS-T13-91. In LR USPS I-221 (Engineered Standards Book of Barcodes), Level 6 is a scan for the starting odometer reading on the delivery vehicle.

- (a) Was this intended to be entered at the start of each route-day? Please explain.
- (b) Was there also a scan for the odometer reading at the end of the day? Please identify.

ADVO/USPS-T13-92 With respect to the codes in LR USPS I-221 (Engineered Standards Book of Barcodes),

- (a) There are two page 3s, one is for the "Inside Study" and the other is for the "Outside Study." Please confirm that the data relating to these barcodes were used to develop the Work Standards. If this is incorrect, please explain what these data were used for.
- (b) There are two page 4s, one is for the "Inside Work Sample" and the other is for the "Outside Work Sample." Please confirm that the data relating to these barcodes were used to develop the work/activities sampling data. If this is incorrect, please explain what these data were used for.
- (c) Please confirm that the data for the "Inside Study" and the "Inside Work Sample" were both collected on the route-days included in your Engineered Standards Database (LR I-163). If this is incorrect, please explain when each of these types of data were collected.
- (d) Please confirm that the data for the "Outside Study" and the "Outside Work Sample" were both collected on the route-days included in your Engineered Standards Database (LR I-163). If this is incorrect, please explain when each of these types of data were collected.

ADVO/USPS-T13-93. In LR USPS I-221 (Engineered Standards Book of Barcodes), code levels 8.2 through 11.4.1 are divided between "Inside" and "Outside."

- (a) Please confirm that the only codes given in your testimony (other than the codes associated with unit/route/job classification) are the code levels 10 through 11.4.1 of the "Outside Study" set. If this is incorrect, please indicate where in your testimony these other codes can be found.
- (b) Please refer to your responses to MPA/USPS-T13-22 and 23, where you explain the points at which the outside activities of letter carriers began and ended. Are these points the breakpoints for "Inside Study" and "Outside Study?" If not, please explain fully the relationship between the

outside activities and the "Outside Study" codes (i.e., are there "Outside Study" coded tallies that were not included in the LR I-163 database? Should some "Inside Study" coded tallies be included in the LR I-163 database?) .

- (c) Please confirm that there were "Inside Study" codes for "inside clock" and "outside clock," were any of these codes recorded and, if so, why weren't these used for those particular route days?

ADVO/USPS-T13-94. Please explain the Level 8.2 Status codes (i.e., Start, Finish, Interrupt, Resume, N/A) displayed in LR I-221 (the Engineering Standards Book of Barcodes).

- (a) What was their purpose?
- (b) When were they used?
- (c) When there was an interruption, did the Videx II continue to beep and the data collector continue to record tallies as indicated in the 8.2 codes, or did the scanner have to be restarted?
- (d) Why weren't those codes included in the LR I-163 database?

ADVO/USPS-T13-95. For LR I-221 (Engineering Standards Book of Barcodes), please explain why there are "Inside Study" codes for the following:

- (a) Bus - Public (TT25)
- (b) Train/Subway (TT29)
- (c) Load Vehicle, Return Hamper (V02)
- (d) Travel to 1st Delivery (V03)
- (e) Refueling (V04)
- (f) Travel b/t Park Points (V05)
- (g) Return to Unit (V06)
- (h) Unload Vehicle at End (V07)

ADVO/USPS-T13-96. For LR I-221 (Engineering Standards Book of Barcodes), please confirm the following and explain why it occurs:

- (a) Both the "Inside Study" and "Outside Study" sets of codes have the same codes for Vehicle Types (Level 8.3 TT codes) and Task Types (Level 8.4 V codes).
- (b) Both the "Inside Study" and "Outside Study" sets of codes have many of the same Level 10 Location codes (i.e., dock, vehicle, misc, PBL).

ADVO/USPS-T13-97. For LR I-221 (Engineering Standards Book of Barcodes), please explain fully the definitional differences between Outside Study Level 8.3 Delivery Types (TT and DT codes) and Level 11.2 Outside Delivery Type Codes (WT codes), and explain why there are two sets of codes.

ADVO/USPS-T13-98. In the Outside Study and Work Sample codes listed in LR I-221 (Engineering Standards Book of Barcodes), please explain:

- (a) The definitional difference between the Level 8.4 "Outside Task" codes (P codes for items such as various types of deliveries, unloading vehicle, re-arranging vehicle, restocking satchel) and the Level 11.4.1 "Outside Activities" codes (e.g., J codes for delivery/collection and setup; T code for travel between deliveries).
- (b) The circumstances when the data collectors entered each Level 8.4 code.
- (c) How each of the Level 8.4 P codes relate to each of the Level 11.4 Work Activity codes.

ADVO/USPS-T13-99. Consider the barcodes listed in LR I-221 (Engineering Studies Book of Barcodes).

- (a) When you assigned tallies among the STS classifications, did you use any coded or written information other than the Outside Study Codes 10 through 11.4.1 included in LR I-163? If so, please explain fully.
- (b) If you did not use the Level 8.2 through Level 9.1 Outside Study information for purposes of assigning tallies among the STS classifications, please explain why you ignored that information.
- (c) Why did you exclude the Level 8.2 through Level 9.1 Outside Study information from the LR I-163 database? Please explain.

ADVO/USPS-T13-100. Please refer to the Level 13 barcodes listed in LR I-221 (Engineering Studies Book of Barcodes).

- (a) For each route-day, how often were each of these items identified and counted? Please specify by each code.
- (b) Provide a complete definition for each item.
- (c) Are these the manual entries which you describe in response to MPA/USPS-T13-43? Please explain.