

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

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Postal Rate and Fee Changes, 2000

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2000-1

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
LLOYD RAYMOND (NAA/USPS-T13-1-7)  
March 22, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Lloyd Raymond (NAA/USPS-T13-1-7) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By:



William B. Baker  
E. Joseph Knoll  
Isaac R. Campbell  
WILEY, REIN & FIELDING  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 719-7255

Robert J. Brinkmann  
NEWSPAPER ASSOCIATION OF AMERICA  
529 14th Street, N.W.  
Suite 440  
Washington, D.C.  
(202) 638-4792

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

March 22, 2000

  
William B. Baker

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NAA/USPS-T13-1: Please refer to page 28 of your testimony. Under Level 11.4 Activity, there appears the designation "J06 Mix – Letters, Flats, ADVOs - packet". With respect to this designation, please state:

- a. Is there any other instance in your survey in which mail pieces are identified by the name of a particular mailer, such as Advo? If so, please identify those instances.
- b. Was the selection of "Advo" as a designation pursuant to a suggestion or directive from anyone in the Postal Service?
- c. What does the designation "Advo" mean in this context?

NAA/USPS-T13-2. Please describe how observations of carriers handling detached address labels were recorded.

NAA/USPS-T13-3. Did you consider alternative means of conducting the *Engineered Standards/Delivery Redesign project*? If so, please explain why you chose to conduct the project in the way that you did, rather in an alternative manner.

NAA/USPS-T13-4. Please refer to your testimony at page 1, lines 6-8 where you state that you have "extensive experience applying work-measurement systems, developing time-based planning and scheduling systems, providing data for project/product costing, and making recommendations for methods improvements."

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- a. Please provide further description of this experience that is not related to the United States Postal Service.
- b. *Please provide further description of this experience that is related to the United States Postal Service.*
- c. Please identify similarities between the experiences described in (a) and (b) and the ES study.

NAA/USPS-T13-5. Please refer to your testimony at pages 1-3 regarding the project design.

- a. Please confirm that you were principally responsible for the design of the project that collected the ES data contained in LR-l-163.
- b. Please describe the tally sampling approach that you employed. What other data collection, measurement, or sampling processes could have been utilized to develop engineered methods and time standards for city letter carriers?
- c. Given that alternative methods identified in (b), on what basis did you select the tally sampling approach?
- d. Have you developed other projects that required the collection of data over a 16-month period?
- e. Please identify your knowledge of any similarities between the ES study and the route measurement systems or engineering time studies of other postal administrations or courier companies used to design and attribute their delivery costs, as suggested by the A. T. Kearney Data Quality Study (April 16, 1999).

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- f. Please provide your assessment of the appropriateness of the use of the ES data in the current R2000-1 docket, given the Data Quality Study's suggestions that such a project is a "potential alternative source of data" and "will take several years to fully develop," including any and all quality and validation steps you or others performed to merit its use.
- g. Please confirm that the quality assurance checks described at page 13 of your testimony were typical of projects of this type and magnitude.

NAA/USPS-T13-6. Please refer to your testimony at pages 7-9 regarding the site selection.

- a. Please provide your assessment of the reasonableness of the site selection method and how representative were the sites and routes selected and studied.
- b. What, if any, were the limitations of the site selection method?
- c. Were other site selection methods considered, and, if so, why was this particular one utilized?
- d. In selecting sites, what were the engineering objectives and accompanying statistical requirements? Please explain whether these objectives were accomplished, and provide the basis for your assessment.

NAA/USPS-T13-7. Please refer to your response to ADVO/USPS-T13-17 and Witness Baron's response to MPA/USPS-T12-26 (LR-I-219).

- a. Please confirm that the table in response to ADVO reports 0 Residential Central possible deliveries and 195, 33, 142, and 153 Residential NDCBU possible deliveries for route numbers 1579, 1581, 1595, and 4104 (rows 3-6 in the table).

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- b. Please confirm that the spreadsheet in response to MPA reports 0 Residential NDCBU possible deliveries and 195, 33, 142, and 153 Residential Centralized possible deliveries for route numbers 1579, 1581, 1595, and 4104 (rows 5-8 in the spreadsheet).
- c. Please explain this discrepancy, and resolve all column headings that were apparently transposed. If you cannot, please refer this interrogatory to Witness Baron or others with the ability to provide such explanation.