Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO MPA INTERROGATORIES (MPA/USPS-T13-82-109)

The United States Postal Service hereby provides the response of witness

Raymond to the following interrogatories of the Magazine Publishers of America:

MPA/USPS-T13-82-109, filed on March 7, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

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March 22, 2000

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

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.

RESPONSE:

Confirmed. The Engineered Standards approach only required the observer to

record the mode of travel.

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AMERICA, INC.

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.

RESPONSE:

I cannot respond without references to the specific records in question, including
CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data
fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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AMERICA, INC.

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

RESPONSE:

The observers would have recorded the green boxes as a relay box and the blue

boxes as a collection box.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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AMERICA, INC.

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?

RESPONSE:

I cannot respond without references to the specific records in question, including
CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data
fields.

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 Code (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*	DelaySpcfyDetail	Delay Codes (G Codes)
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 1st 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,	Delay Codes (D Codes)	N/A

		Vehicle*		
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 1st Dlvr.	Walking Codes (K Codes)
ll.	FAT	Vehicle	N/A	Mat'l Handling
mm.	Street Support	Misc	DelaySpcfyDetail	Delay Codes (G Codes)
nn.	Street	Misc*	N/A	N/A

		Support		
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

RESPONSE:

(a-ww) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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?

RESPONSE:

(a-c) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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AMERICA, INC.

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?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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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?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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AMERICA, INC.

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

RESPONSE:

Confirmed that there are no tallies indicating Curbline Delivery type to Drive time.

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AMERICA, INC.

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

RESPONSE:

Yes, the observers had the USPS Form 3999x that lists the entire route with

delivery types by delivery point.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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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?

RESPONSE:

(a-e) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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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.

RESPONSE:

(a-b) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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

RESPONSE:

This appears to be the case. Generally, because the "Hardship" activity requires customer contact, it falls within Load Time. See Appendix F to my testimony. I cannot respond further without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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AMERICA, INC.

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.

RESPONSE:

I cannot respond without references to the specific records in question, including

CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data

fields.

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AMERICA, INC.

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.

RESPONSE:

I cannot respond without references to the specific records in question, including

CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data

fields.

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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.

RESPONSE:

It appears, with respect to "No Access to Box", in allocating the tallies to Load, the carrier was at the point of delivery. In allocating a tally to driving time, the carrier was in his vehicle on a park and loop route. In allocating tallies to route access/Fat, the tallies show the carrier on route, and not associated with a vehicle. I cannot respond further without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

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	Walk Flat
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 Delivery	Any Delivery Type (WT Codes)	Del/Coll	N/A
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 Codes (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 Codes (WT Codes)	Travel B/t Dlvr.	Walk of 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 Delivery	Dismount	Travel B/t Dlvr.	Any Receptacle Type (H Codes)
ll.	Point of Delivery	Any Delivery Type Codes (WT Codes)	Del/Coll	Walk Code (K Codes)
mm.	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	Drop to Customer

			Dlvr.	

RESPONSE:

(a-tt) I cannot respond without references to the specific records in question,

including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for

relevant data fields.

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AMERICA, INC.

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.

RESPONSE:

I cannot respond without references to the specific records in question, including

CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data

fields.

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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
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)

RESPONSE:

I cannot respond without references to the specific records in question, including

CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data

fields.

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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?

RESPONSE:

In the typical carrier's typical day, I agree that carriers perform loading and setting

up, travel to first delivery, return to unit and unloading. The work sampling

process, where the scan is taken every six minutes, may not capture, on a specific

day, these particular activities.

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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?

RESPONSE:

Not necessarily. The carrier may take PBL time in the office, before going to the

street, or after returning from the street. PBL time may also be taken sporadically

throughout the street time, but not have been identified at the moments the work

samplings were taken. On occasion, there may be carriers that did not take any

personal time or break time.

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AMERICA, INC.

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.

RESPONSE:

Lunch break tallies were deleted from the database provided to witness Baron,

these tallies did not fall into the STS categories described in Appendix F.

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.

RESPONSE:

(a) The carriers after loading the trays or tubs to the rear of the vehicle would then
load the satchel while still at the dock.

(b) Setup is loading the satchel or moving trays to the front of the vehicle. Loading
is moving trays from a hamper or nutting truck to the rear of the vehicle.

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AMERICA, INC.

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

RESPONSE:

I cannot respond without references to the specific records in question, including

CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data

fields.

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AMERICA, INC.

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.

RESPONSE:

I have identified one such tally. This tally involves a foot route. It is possible that

the carrier arrived at the relay box before the mail arrived for him to deliver his next

loop.

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AMERICA, INC.

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.

RESPONSE:

I cannot respond without references to the specific records in question, including

CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data

fields.

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AMERICA, INC.

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.

RESPONSE:

I have identified two tallies involving "In Unit Walking" where the activity is

"loading." The data collectors were probably observing a carrier inside the unit,

either on his way out to load a vehicle, or on his way back in to get more mail to

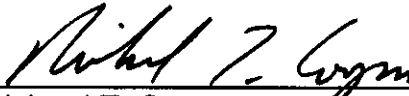load the vehicle.

DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are

true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 3-22-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the Rules of

Practice.

Richard T. Cooper

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
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March 22, 2000