

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

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO MPA INTERROGATORIES
(MPA/USPS-T13-57-81)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T13-57-81, filed on March 7, 2000.

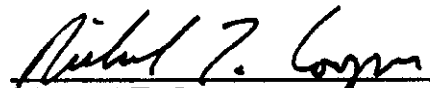
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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March 22, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
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OF AMERICA, INC.**

MPA/USPS-T13-57. Please refer to page 10 of your testimony, where you state: ...the TW2 was programmed with the data collection hierarchy and to emit an audible tone to notify collectors to collect work-sampling data. The collection of the work-sampling data began with this tone. At the beep, the LCD on the TW2 prompted data collectors with the word/phrase representing each level of the collection hierarchy. Information was required to be collected/scanned at each level of the hierarchy. In general, all sub-level information (detail level) was scanned before the data collector continued the scanning process at the next level.

Please provide all systematic written or oral instructions that were given the data collectors as to the exact instant or period of carrier time to be recorded.

(a) For what period of carrier activity was the observation intended to record (e.g., an instant snapshot of the activity just as the beep occurred, a snapshot 5 or more seconds after the beep occurred, a snapshot at the next convenient location after the beep, the next several seconds of the carrier's activity just as the beep occurred, several seconds at the next convenient location after the beep)?

(b) With respect to your response in (a), what systematic efforts did you make to ensure that all data collectors correctly recorded the same instant or period of time in the same manner? For example, do any video records exist that could be matched to data records to validate the actual observations?

RESPONSE:

(a) The observer took an instant snapshot of the carrier's activity when the beep occurred. The observer then scanned in the observation as soon as possible.

(b) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes. No records were maintained on the frequency of the checks.

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MPA/USPS-T13-58. For the observed routes:

(a) Were all of them designed as 8-hour routes? If not, please identify the ones that were not and specify their designed length.

(b) Was all 8 hours of the carrier's day observed and recorded? If some routes or days were treated differently in this respect than others, please distinguish route/day, and please explain why this was done.

(c) For any route, for any observation day, did any of the carriers exceed their 8 hours or did any complete their work before their 8 hours were over? Please identify all such route/days and explain how the observations proceeded in those cases.

(d) Did all the routes have a full-time regular carrier? If some of the data were for someone other than a full-time regular carrier, please explain what type of personnel each route had.

(e) When a chosen route had router or auxiliary assistance, how did you treat it?

(f) Please identify each route-day that also had router or auxiliary assistance.

(g) Did you determine how long it had been since each route was evaluated by a supervisor? If so, please indicate those routes for which you have this period and the length of the period since last evaluated.

(h) Did all the routes receive Delivery Point Sequenced (DPS) volume? If not, please identify the ones that did.

RESPONSE:

(a) I do not have that information. The route designed start and stop times are recorded at the beginning of the 933 video tapes. The routes were picked at random, if the route was designed for more or less than eight hours the route was studied.

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(b) The complete route was observed. No, the observers did not treat routes or days differently.

(c) The observers studied the route for the entire work cycle.

(d) The job classification for the carrier observed on each route is in Library reference USPS-LR-I-163.

(e) The observers attempted to capture all work performed in the route-day.

(f) Records were not maintained on router or auxiliary assistance.

(g) No we did not determine how long since the last route evaluation.

(h) No, all routes did not receive DPS. Library Reference USPS-LR-I-238 lists the routes that did receive DPS volume.

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MPA/USPS-T13-59. Please refer to your testimony at Appendix C.

(a) Throughout Phases 1 and 2 of the data collection, were the same sheets, with the barcodes in the same order, used for each route?

(b) At any time, was there any effort made to determine that the order or placement of the barcodes on those sheets did not bias the data collection in any way? Please describe it.

(c) Please describe or provide a photo of exactly how the data collector handled both the barcode sheets and the Videx TimeWandII.

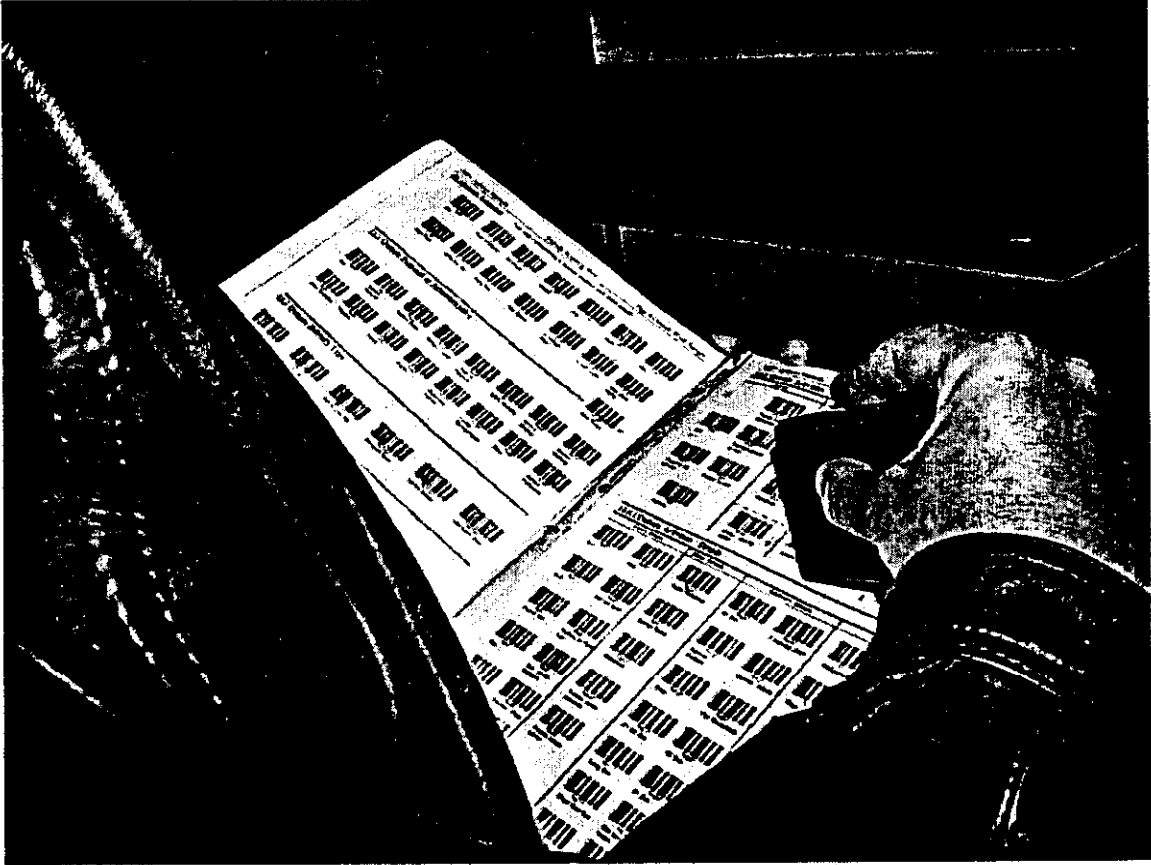
RESPONSE:

(a) Yes.

(b) No.

(c) The barcode sheets were inside plastic pockets in a ½ inch three ring binder. When the binder was open the page of Location through Outside Delivery Type, Levels 10 – 11.3 would be on the left side and the sheet of Outside Activities and Outside Activities – Details, Levels 11.4 – 11.4.1 would be on the right.

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MPA/USPS-T13-60. Please identify, by code, each of the data collectors employed to collect this data, relate them to each route-day of data collected, and specify the ones which had previous experience (in projects other than one in which you collected this time-proportion data and the standards data) observing postal delivery carriers for purposes of identifying specific activities. If more than one collector collected this data on a particular day, please provide separate information for each.

RESPONSE:

The table that identifies the specific observers and codes is in my response to interrogatory MPA/USPS-T-13-16. OBS12 and OBS13 had collected data with the scanner on other, non-postal clients.

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MPA/USPS-T13-61. Please refer to your testimony at Appendix D Level 10 Locations, and please provide the following:

- (a)** All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 10 Locations.
- (b)** All systematic efforts made to ensure that the LOO-L24 codes were consistently and correctly applied by all data collectors.

RESPONSE:

(a) Refer to Library Reference USPS-LR-I-220 that shows pictures of various postal items. *The oral instructions provided to the observers are as shown Appendix D to my testimony.*

(b) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes. No records were maintained on the frequency of the checks.

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MPA/USPS-T13-62. Please provide all systematic written or oral guidance to the data collectors on how to identify and distinguish between the following location codes:

(a) LO8 Vehicle and LO7 Dock, LO9 Park Point, L13 On Route, L17 Gas Station, L19 In Vehicle at Stop, and L20 In Vehicle in Traffic.

(b) L13 On Route and LO9 Park Point, L10 Collection Box, LI 1 Relay Box, L12, Point of Delivery, L19 In Vehicle at Stop, L20 In Vehicle in Traffic, and L21 Wait when Walking.

(c) LO9 Park Point and LIO Collection Box, L12 Point of Delivery, L20 In Vehicle at Stop.

RESPONSE:

(a-c) Refer to Library Reference USPS-LR-I-220 that shows pictures of various postal items. The oral instructions provided to the observers are as shown in Appendix D to my testimony.

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MPAIUSPS-T13-63. Please identify what kinds of locations the data collectors would identify as Site Location L15 (Miscellaneous).

RESPONSE:

In checking the observer comments for the L15 location we have found:

Elevators, Phone Booths, Supervisors Desk, Customers lawn, Locked keys in

Vehicle, Carriers in vehicle parking lot due to no work.

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MPA/USPS-TI3-64. With respect to Level 11.2 Delivery Type, please provide:

- (a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 11.2 Delivery Types.
- (b) A description of all systematic efforts made to ensure that the WTOI-WT05 codes were consistently and correctly applied by all data collectors.
- (c) The systematic written or oral guidance given to data collectors with respect to distinguishing between a WT04 Dismount Delivery and a WT05 Central Delivery, in terms of type of mail equipment and mail receptacles used.

RESPONSE:

- (a) Oral instructions provided to observers are as shown in Appendix D to my testimony.
- (b) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes.
- (c) Oral instructions provided to observers are as in Appendix D. The equipment was then defined in the 11.4 and 11.4.1 levels of the barcode scanning sheets.

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MPA/USPS-T13-65. Please explain how the data collectors assigned a Level 1 1.2 Delivery Type and Level 11.3 Delivery Type Status when the carrier was moving from one kind of delivery type or delivery type status to another.

RESPONSE:

Based on the delivery types on the USPS Form 3999X, the observers would change the delivery type when traveling to the next delivery.

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MPA/USPS-T13-66. Please state, with respect to delivery types:

(a) Whether motorized carriers ever dismount to make centralized deliveries. If so, please explain how the data collectors distinguished between the "dismount" and "centralized".

(b) Whether some carriers ever remain in their vehicles (at curblines) while delivering to NDCBU or other types of centralized outside boxes. If so, please explain how the data collectors distinguished between "curblines" and "centralized".

(c) Whether central deliveries are made by both motorized and foot carriers. Please explain.

RESPONSE:

(a) Pursuant to verbal instructions based on the instructions shown in Appendix D to my testimony.

(b) Deliveries that were classified as Central required the carrier to exit the vehicle. If a central type box was serviced from in the vehicle and the 3999X classified the delivery point as curb the observers recorded curblines delivery.

(c) Central deliveries are serviced by both modes of travel.

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MPA/USPS-T13-67. With respect to the Level 11.4 activities, please provide the following:

- (a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 11.4 Activity alternatives.
- (b) All systematic written or oral guidance that was given to the data collectors concerning the relationships between 11.4 Outside Activity and 11.4.1 Activity Detail codes.
- (c) The systematic written or oral guidance given to data collectors on how to distinguish among TO5 (walking) and TO1 Travel to First Delivery Point, TO2 Travel b/t Delivery, and TO3 Travel b/t w/Sort.
- (d) How were the data collectors systematically instructed to tell the difference between DO8 Delay Specify and FO4 Delay Specify? How were the data collectors systematically instructed to tell the difference between JO4 Parcels and F02 Parcels?
- (f) A description of all systematic efforts to ensure that the Level 11.4 codes were consistently and correctly applied by all data collectors.

RESPONSE:

- (a) Oral instructions provided to observers are as shown in Appendix D to my testimony.
- (b) Oral instructions provided to observers are as in Appendix D.
- (c) The T05 code was used when the carrier was walking other than the other defined codes. Oral instructions provided to observers are as in Appendix D.
- (d) The F04 Delay is related to customer delays and the D08 delays are associated with the 11.4.1 I code delays and the observers comment log.

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The J04 parcels were for in office work with parcels and F02 parcels are associated with delivery work for parcels. The records of street activity with the J04 code were associated with loading parcels into the vehicle.

(f) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes.

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MPA/USPS-T13-68. With respect to the relationship between Level 10 (Location) and Level 11.4 (Activity) codes, please provide all systematic written or oral guidance you gave your data collectors (and data processors) on Level 11.4 codes which are always or should never be associated with the following:

- (a) Dock Location.
- (b) Vehicle Location.
- (c) Park Point Location.
- (d) Collection Box Location.
- (e) Relay Box Location.
- (f) Point of Delivery Location.
- (g) On Route Location
- (h) Miscellaneous Location
- (i) Gas Station Location
- (j) In Unit Walking Location
- (k) In Vehicle at Stop Location
- (l) Wait When Walking Location
- (m) Other Route Location

RESPONSE:

(a-m) No such guidance was given regarding combinations which were not allowed. The observers were to record events as they occurred. The observers made written comments on their daily comments logs with respect to unusual situations. Without specific references to particular data records, I cannot comment further.

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MPA/USPS-T13-69. With respect to the Level 11.2 (Delivery Type) and Level 11.3 (Delivery Type Status) codes, please:

(a) Confirm that all but 22 of your 39,046 tallies identifies a Delivery Type, even those for Dock, Collection Box, Miscellaneous, Gas Station, In Unit Walking, In Vehicle in Traffic, and Wait While Walking.

(b) Confirm that all but 4,076 of your 39,046 tallies identifies a Delivery Type Status.

(c) Provide the systematic guidance that you gave your data collectors (and data processors) on how to correctly identify delivery type for tallies not at the point of delivery.

(d) Provide all systematic guidance that you gave your data collectors (and data processors) on how to correctly identify delivery type status for tallies when the Level 10 code was not Point of Delivery.

(e) Explain why the data collectors assigned delivery type and delivery type status codes to locations that were not at the point of delivery.

RESPONSE:

(a) Confirmed.

(b) Confirmed.

(c-e) Based on the USPS Form 3999X delivery type the observer choose the code for either the delivery the carrier was servicing or the next delivery the carrier was traveling to.

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MPA/USPS-T13-70. With respect to the relationship between Level 11.4 (Activity) and Level 1 1.4.1 (Activity Detail) codes, please provide all systematic written or oral guidance that you gave your data collectors (and data processors) on the following:

- (a) The circumstances when Activity T codes are associated with something other than Activity Detail K codes.
- (b) Which activity detail codes should always or never be associated with Activity T codes.
- (c) When D codes should be associated with anything other than Activity Detail I codes.
- (d) Which activity detail codes should always or never be associated with Activity D codes.
- (f) When Activity J codes should be associated with anything other than Activity Detail H codes.
- (g) Which activity detail codes should always or never be associated with Activity J codes.
- (h) When F codes should be associated with anything other than Activity Detail G codes.
- (i) Which activity detail codes should always or never be associated with Activity F codes.

RESPONSE:

(a-i) No specific written or oral instructions other than those shown in Appendix D to my testimony were given to the observers and data processors. Without specific references to particular data records, I cannot comment further.

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MPA/USPS-T13-71. With respect to the relationship between Level 11.3 (Delivery Type Status) and Level 11.4.1 (Activity Detail), please provide all systematic written or oral guidance that you gave your data collectors (and data processors) on which Level 1 1.4.1 H codes (delivery receptacle type) should go with which delivery type status codes.

RESPONSE:

Observers were to record the specific type of receptacle regardless of the Delivery type status.

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MPA/USPS-T13-72. Please consider Level 11.4 Activity Code DO1 (No Access to Box).

(a) What specific physical action was the data collector observing. Please explain how that could be determined from the data.

(b) For DO1, do the data indicate whether and how the mail was actually delivered to that particular customer? Please explain.

RESPONSE:

(a) The mail box was blocked by a parked car on a curblin delivery. A locked door on a business or central inside deliveries. A missing or damaged mail box on a Park and loop type delivery. The data records a general category, not a specific cause.

(b) I do not know. This is beyond the scope of the work sampling, which records general categories.

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MPA/USPS-T13-73. With respect to Level 11.4 Activity Code F03 (Hardship), what specific physical action was the data collector observing? Please explain how that could be determined from the data.

RESPONSE:

Hardship is a service provided by the carrier when the customer or the customer's family has asked the carrier or the post office to make personal contact with an elderly or disabled customer with every delivery. The observer would have observed this personal contact or attempted personal contact. The F03 code is selected at the 11.4 level.

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MPA/USPS-T13-74. For Level 11.4 Activity code FO1 (accountable), please provide the following information:

(a) At point of delivery, when an accountable (FO1) is indicated, does that mean that only an accountable was delivered to that point at that time? Please explain how that can be determined from the data.

(b) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail? Please explain.

(c) What specific physical action was the data collector observing? Please explain how that can be determined from the data.

(d) If at point of delivery, does FO1 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data..

(e) At any other Level 10 location code, other than point of delivery, when an accountable is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data.

(f) When Activity Detail Codes GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) were indicated with FO1 (Accountable), did that mean that those activities were required to physically deliver the mail to the customer? Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a) No, an accountable was the main focus of the carrier. The observer selects the F01 code at the 11.4 level.

(b) No, the work sampling data do not permit this type of information.

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(c) The carrier handling, delivering or processing an accountable type of mail.

The observer selects the F01 code at the 11.4 level.

(d-e) The level 10 location code would indicate where the carrier was, and the level 11.4.1 code would indicate the mail receptacle. Please provide the specific records for further analysis.

(f) Those activities were required to physically deliver the mail to the customer.

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MPA/USPS-T13-75. For Level 11.4 Activity code F02 (parcel), please provide the following information:

(a) At point of delivery, when a parcel (F02) is indicated, does that mean that only a parcel was delivered to that point at that time? Please explain how that can be determined from the data.

(b) Can the data be used to determine whether that point of delivery was served a second time that day with all other mail?

(c) What specific physical action was the data collector observing? Please explain how that can be determined from the data.

(d) If at point of delivery, does F02 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data.

(e) At any other Level 10 location code, other than point of delivery, when a parcel is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data. Please explain.

(f) When Activity Detail Code GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) was indicated with F02, did that mean that those activities were required to physically deliver the mail to the customer. Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a) No, a parcel was the main focus of the carrier. The observer selects the F02 code at the 11.4 level.

(b) No, the work sampling data do not permit this type of information.

(c) The carrier handling, delivering or processing an parcel type of mail. The observer selects the F02 code at the 11.4 level.

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(d) The level 10 location code would indicate where the carrier was, and the level 11.4.1 code would indicate the mail receptacle. Please provide the specific records for further analysis.

(f) Those activities were required to physically deliver the mail to the customer.

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MPA/USPS-TI3-76. For Level 1 1.4 Activity code JO4 (parcels), please provide the following information:

(a) At point of delivery, when parcels (JO4) are indicated, does that mean that only parcels were delivered to that point at that time? Please explain how that can be determined from the data.

(b) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail?

(c) What specific physical action was the data collector observing? Please explain how that could be determined from the data.

(d) If at point of delivery, does JO4 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that could be determined from the data.

(e) At any other Level 10 location code, other than point of delivery, when parcels are indicated, what specific physical action was the data collector observing? Please explain how that could be determined from the data.

(f) When Activity Detail Codes GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) are indicated with JO4, does that mean that those activities were required to physically deliver the mail to the customer? Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a) No, a parcel was the main focus of the carrier. The observer selects the FJ04 code at the 11.4 level.

(b) No, the work sampling data do not permit this type of information.

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(c) The carrier handling, delivering or processing an parcel type of mail. The observer selects the J04 code at the 11.4 level.

(d-e) The level 10 location code would indicate where the carrier was, and the level 11.4.1 code would indicate the mail receptacle. Please provide the specific records for further analysis.

(f) Those activities were required to physically deliver the mail to the customer.

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MPA/USPS-T13-77. For Level 11.4 Activity code JO6 (mix), please provide the following information:

(a) At point of delivery, when mix (JO6) is indicated, does that mean a mix of mail was delivered to that point at that time? If so, does it indicate any particular products? Please explain how that can be determined from the data.

(b) Does JO6 indicate any particular type of mail container or a particular method of mail delivery, as opposed to a typical delivery of multiple postal products? Please explain.

(c) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail?

(d) What specific physical action was the data collector observing? Please explain how that can be determined from the data.

(e) If at the point of delivery location, does JO6 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data.

(f) At any other Level 10 location code, other than point of delivery, when JO6 is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data.

(g) When Activity Detail Code GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) were indicated with JO6, does that mean that those activities were required to physically deliver the mail to the customer. Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a-c) No records exist of this combination.

(d) The carrier handling tubs of trays of mail.

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(e) No records exist of this combination.

(f) The carrier at the vehicle or on the dock handling trays or tubs of mail.

(g) No records exist of this combination.

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MPA/USPS-T13-78. For Level 11.4 Activity Code F03 (Hardship):

**(a) What specific physical activity was the data collector observing?
Please explain how that can be determined from the data.**

**(b) Do the data indicate whether and how mail was delivered to that
particular customer? Please explain.**

RESPONSE:

(a) See my response to interrogatory MPA/USPS-T13-73.

(b) No, the work sampling data do not provide that information.

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MPA/USPS-T13-79. Please provide all systematic written and oral guidance you gave your data collectors (and data processors) on which Level 11.4.1 Activity Detail codes are always or should never be associated with the following Activity codes:

- (a) No Access to Box
- (b) Vehicle Breakdown
- (c) Weather
- (d) Traffic/Detour
- (e) No Work
- (f) Delay-Specify (D08)
- (g) Accountable
- (h) Parcel
- (i) Hardship
- (j) Delay-Specify (F04)
- (k) Parcels
- (l) Mix
- (m) Delivery/Collection
- (n) Loading
- (o) Unloading
- (p) Setup
- (q) Finger @ Delivery
- (r) N/A
- (s) Travel to 1 Delivery
- (t) Travel b/t Delivery
- (u) Travel b/t w/sort
- (v) Return to Unit
- (w) Walking.

RESPONSE:

No specific written or oral instructions other than those in Appendix D were given to the observers and data processors. The Library Reference LR-I-220 was provided to the observers.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-80. Please explain why activity detail H codes (codes for mail collection and receptacle boxes) were used with the following outside activities:

- (a) Finger@Delivery
- (b) N/A
- (c) Delay
- (d) No Access to Box
- (e) Setup
- (f) Travel B/T Deliveries
- (g) Walking
- (h) Hardship.

RESPONSE:

(a-h) The H codes further describe the receptacle or collection box near the carrier. Without specific references to particular records for the code combinations in question, I cannot answer further.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-81. Please explain why a mail receptacle code (activity detail H code), other than drop to customer, was used with the Accountable outside activity.

RESPONSE:

The carrier's main function was with the accountable and other activity details other than drop to customer would indicate the activity taking place with the accountable. Without specific references to particular records for the code combinations in question, I cannot answer further.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 22, 2000