

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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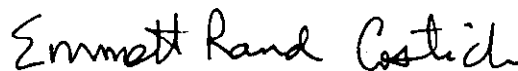
Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DONALD M. BARON
(OCA/USPS-T12-11-16)
March 23, 2000

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T12-11. Please refer to your testimony at page 32, lines 14-17, where you note that witness Raymond (USPS-T-13) assigned a variable defining the "street time activity category of each tally." Regarding the assignment of these variables:

- (a) Did you review the ES tallies to identify whether or not they could be accurately assigned to relevant street-time categories? If yes, please discuss in detail the extent and results of your review.
- (b) Of the various levels and codes used in the Outside/Street work-sampling hierarchy, did you identify any that could not be assigned readily to a particular street-time activity category? If yes, please identify them and discuss the resolution, if any, concerning appropriate assignment.
- (c) Did you discuss or establish with witness Raymond any protocols for assigning ES tallies to street-time activity categories? If yes, please describe fully these discussions or protocols.
- (d) In your opinion, is the nature of the ES tallies and their relation or assignment to street-time activity categories open to interpretation? If yes, please explain your answer in detail. If no, why not?

OCA/USPS-T12-12. Based upon your knowledge and understanding of the 1986 Street Time Sampling (STS) study and the Engineered Standards/Delivery Redesign (ES) study:

- (a) Were the STS and ES studies designed for similar purposes? Please explain any similarities or dissimilarities you identify.

- (b) Were the route sampling procedures similar for both studies? Please explain any similarities or dissimilarities you identify.
- (c) Did the sampling procedures employed in the STS and ES studies yield a similar distribution of route types by ZIP code? Please explain any similarities or dissimilarities you identify.
- (d) Were the processes for observing and collecting data on carrier activities similar in both the STS and ES studies? Please explain any similarities or dissimilarities you identify.
- (e) In your opinion, assuming the Postal Service had implemented a "new STS" study between October 1996 and April 1998 using the same approach as in the 1986 STS study, would this new STS study have yielded results consistent with those of the ES study? Please explain your answer fully.

OCA/USPS-T12-13. Based upon your knowledge and understanding of the 1985 Load Time Variability (LTV) study and the Engineered Standards/Delivery Redesign (ES) study:

- (a) Were the processes for observing and collecting data on carrier activities similar in both the LTV and ES studies? Please explain any similarities or dissimilarities you identify.
- (b) Is the definition of load time under the ES study, as derived through the interpretation and assignment of ES tallies, consistent with the definition of load time applied in the LTV study? Please explain any similarities or dissimilarities you identify.

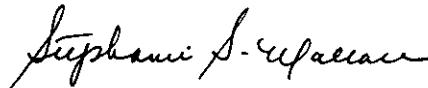
OCA/USPS-T12-14. Please provide estimates of Base Year 1998 accrued load time costs using street-time percentages developed from the 1986 STS study.

OCA/USPS-T12-15. Please provide estimates of Base Year 1998 accrued load time costs predicted by the LTV model.

OCA/USPS-T12-16. Please refer to Docket No. R2000-1, USPS LR-I-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 1998. Confirm that the survey, "(1) Street Time Sampling (STS)" cited on page 7-2 refers to the 1986 STS study. Further confirm that the table appearing on page 7-3 shows the street time sampling percentages developed from the 1986 STS study. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



Stephanie S. Wallace

Washington, D.C. 20268-0001
March 23, 2000