

UNITED STATES OF AMERICA
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

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LLOYD RAYMOND (USPS-T13-10-11)
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 to the United States Postal Service, dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN
Director
Office of the Consumer Advocate

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Attorney

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OCA/USPS-T13-10. Regarding your use of direct observation and a barcode scanning system to collect data on carrier activities:

- (a) Why did you employ this approach? Please explain your answer fully.
- (b) Did you consider using alternative methods of collecting the data? If yes, please describe these methods and state why you ultimately employed the method you did. If no, why not?
- (c) Did you consider having carriers self-report their activities through a paging or other communications system? Why or why not?

OCA/USPS-T13-11. Given your experience developing and applying work-measurement systems, would you consider the data collection methods and technology employed in the ES study to be "state-of-the-art" for purposes of developing engineered methods and time standards for workload managing systems? Please explain your answer fully.

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 Wallace

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