

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

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POSTAL RATE AND FEE CHANGES, 2000

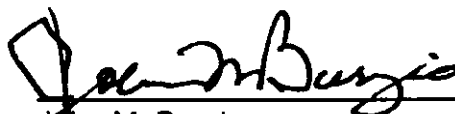
Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
LLOYD RAYMOND (ADVO/USPS-T13-101-110)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Lloyd Raymond. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

If the Postal Service believes that any requested information may be commercially sensitive, we request that the Postal Service contact the undersigned to resolve the matter -- rather than filing an objection that will delay responses.

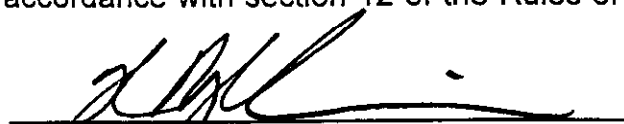
Respectfully submitted,



John M. Burzio
Thomas W. McLaughlin
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1054 31st Street, N.W.
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Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

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


Thomas W. McLaughlin

March 23, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS RAYMOND

ADVO/USPS-T13-101. For LR I-221 (Engineering Standards Book of Barcodes):

- (a) Please provide full expanded definitions for each Level 8.3 Mail Type barcode and each Level 8.4 Inside Task barcode (Inside Study and Outside Study).
- (b) Were the Levels 8.3 and 8.4 barcode data used to develop any activity proportion data or were they used for some other purpose?
- (c) Please provide full expanded definitions for each Level 9 Event Quantities barcode (Inside Study and Outside Study).
- (d) Were the Level 9 barcode data (Inside Study and Outside Study) used to develop the Time Standards? Please explain.
- (e) At what point(s) during the day and under what conditions were the Level 9 event quantities counted during the data collection?
- (f) For each Level 9 event quantity, identify the frequency of the count.
- (g) For each Level 9 event quantity, explain how it was counted.

ADVO/USPS-T13-102. Please provide the Outside Study data in Access Database Format, for each route-day, including the following:

- (a) All data for Levels 1, 2, 3, 3.1, 4, 5, and 6.
- (b) The ending vehicle odometer readings.
- (c) All Outside Study/Outside Work Sample Observations (counts and tallies) for Levels 8.3, 8.4, 9, 10, 11.1, 11.2, 11.3, 11.4, and 11.4.1, and times.
- (d) The observer code for the second person on the team.
- (e) The trainer code for all trainers accompanying observers.

ADVO/USPS-T13-103. At the delivery units observed by your data collectors,

- (a) Were instructions, written or oral, given to the carriers involved in the study? If so, by whom and what were they?
- (b) Were carriers involved in the study allowed to curtail mail as is usually done throughout the year or were they required to take all mail available?
- (c) Were instructions, written or oral, given to the delivery supervisors assigned to the units selected for the study? If so, what were they?
- (d) Did the delivery supervisors at the delivery units involved in the study play any role in the study? If so, what?
- (e) Were any comparisons made between pre- or post-study office and street times and those recorded during the study? If so, please provide the results of those comparisons.
- (f) Did the delivery supervisor's normal everyday activities in assessing the workload for the day, granting or denying requests for overtime or auxiliary assistance, curtailing mail, and directing hand-offs between routes continue as usual during the study? If not, what were the differences and how were these matters handled?
- (g) Did the delivery supervisor's normal interaction with the carriers concerning their work continue during the study? If not, how did it change?
- (h) During the study, did delivery supervisors conduct street observation of carriers involved in the study as they usually would?

ADVO/USPS-T13-104. On a curblin delivery, when a carrier had to dismount from his vehicle at a delivery to drop an accountable or parcel to an address, did the data collector identify that delivery type as a curblin or as a dismount?

ADVO/USPS-T13-105. With respect to both Phase 1 and Phase 2 of your data collection effort, please provide the following documents:

- (a) All work plans or similar documents concerning the design, approach, methods, documentation, and collection of the data.
- (b) All periodic progress reports, interim reports, and final reports submitted to the Postal Service.

- (c) All summaries and/or conclusions submitted to the Postal Service regarding the data collection or its results.
- (d) All recommendations submitted to the Postal Service regarding the data collection or its results, including but not limited to recommendations for further studies, refinements or improvements to the study design or data collection procedures, possible uses (or limitations on uses) of the data or results, etc.
- (e) For each of the categories of information described above, please also provide all documents prepared by the Postal Service or its contractors that you received relating to (a) through (d) above, including but not limited to requests for reports, conclusions, or recommendations, responses to such items, and instructions or conclusions relating to such items.

If any of the kinds of documents described above were submitted to or received from an outside contractor of the Postal Service, rather than directly to or from the Postal Service, please submit them.

ADVO/USPS-T13-106. Please refer to Appendix D of your testimony,

- (a) When was Appendix D prepared?
- (b) If Appendix D was prepared following the data collections for the purpose of inclusion in your testimony, is there any earlier version of it that was in existence and used at the time of the data collections? If so, please provide a copy of it. If more than one version exists, please provide all versions.

ADVO/USPS-T13-107. Please refer to your response to MPA/USPS-T13-8 and 9, concerning the Engineered Standards study. As used below, the term "LR I-163 data" refers only to the data presented in that library reference, excluding other data that may have been collected but not included in the library reference.

- (a) Define and distinguish among the following:
 - Work sampling data
 - Time studies data
 - Videotape data
 - Other quantitative data.
- (b) Confirm that the data in USPS LR I-163 are only "work sampling" (or "activity sampling") data. If this is incorrect, please explain specifically

what the data in LR I-163 are (e.g., time studies data, videotape data, or "other quantitative data").

- (c) What was the specific purpose for and focus of collecting the LR I-163 data?
- (d) Were the LR I-163 data used in isolation (or together with other data) to identify the "actual activities being performed by carriers along with criteria that might be effecting their activities?" Please explain fully how the LR I-163 data were used to accomplish this task.
- (e) Were the LR I-163 data used in isolation (or together with other data) to identify the "methods," "time standards, and "time standards application technique/workload managing system?" Please explain fully how the LR I-163 data were used to accomplish this task.
- (f) Were the LR I-163 data (or any analyses or results directly derived from that data) used as an input in the development of "time standards?" If so,
 - (1) Please provide any analyses or results from the data that were used as an input.
 - (2) Please describe precisely how the data or analyses were used as an input, including a description of the methodology employed in using the information to develop time standards.
 - (3) Please provide all documents relating to such use of the LR I-163 data, or analyses or results derived from that data, in developing time standards.

ADVO/USPS-T13-108. In your response to MPA/USPS-T13-9, you state that "Analyses were performed on the data collected. We analyzed volume data, time data extracted from the videotapes, route data, and the effects of the quantitative data."

- (a) Did any of these analyses involve or use the specific data presented in LR I-163 (as opposed to other data not in LR-163)?
- (b) If so, please provide any such analyses that involved or used the specific data presented in LR I-163.
- (c) If not, please explain why no analyses were made on the specific data in that library reference.

ADVO/USPS-T13-109. Please respond to the following concerning the relationship between the work sampling data in LR I-162 and the development of engineered methods and time standards.

- (a) Please confirm that "time standards," in the standard Industrial Engineering sense of the term (i.e., times for an average, qualified worker to perform specific activities such as pulling mail out of a satchel, "fingering" mail at a mailbox, opening a mailbox, opening a door to a dismount delivery, traveling outside for a certain distance, or filling out a form), were developed during the Engineered Standards project. If this is incorrect, please explain fully.
- (b) Did you attempt to relate the specific work sampling data contained in LR I-163 to the time standards you developed to determine whether they were consistent with each other? If so, please explain fully how you did so and provide all analyses and documentation on that comparison. If not, please explain why not.

ADVO/USPS-T13-110. Interrogatory MPA/USPS-T13-16 asked you to "identify the routes" that each data collector worked on during the survey. Your response provided observers (by observer code) and 4-digit route numbers. With respect to this response,

- (a) Please confirm that 7 pairs of routes in the database (14 total routes) have identical 4-digit route codes but for different city and zip codes, and that your response lists two or more data collectors for each of these identical 4-digit route codes, but does not uniquely identify which observer(s) worked on which routes.
- (b) Please confirm that it is impossible to determine from your response which observer(s) correspond to which of these routes.
- (c) Please provide, in hardcopy and spreadsheet format, a revised response that includes city (CY codes) that will enable parties to "identify the routes" that each data collector worked on.