

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

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OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO UPS INTERROGATORIES  
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/15  
(UPS/USPS-T13-1-2)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the United Parcel Service: UPS/USPS-T13-1-2, filed on February 3, 2000, in accordance with Presiding Officer's Ruling No. R2000-1/15 (March 15, 2000).

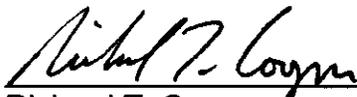
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
March 23, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO  
RULING NO. R2000-1/15 MOTION TO COMPEL RESPONSES TO UNITED PARCEL  
SERVICE INTERROGATORIES UPS/USPS-T13-1 AND 2**

UPS/USPS-T13-1. Refer to page 5 of your testimony, where you state that the purposes of the Engineered Standards/Delivery Redesign project were to develop engineered methods and time standards for city carrier activities, to analyze and validate city carrier work methods, and to provide activity frequency information to determine the portion of time carriers spend doing these activities. Please provide copies of the final report and all interim reports regarding carrier activities developed as a result of the Engineered Standards/Delivery Redesign project.

**RESPONSE:**

See USPS-LR-I-242, produced subject to protective conditions. See Presiding Officer's Ruling No. R2000-1/15.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO  
RULING NO. R2000-1/15 MOTION TO COMPEL RESPONSES TO UNITED PARCEL  
SERVICE INTERROGATORIES UPS/USPS-T13-1 AND 2**

**UPS/USPS-T13-2. You state in your testimony that "The objective of the Engineered Standards was to collect actual activities of the city letter carrier and to develop engineered methods and time standards to establish a workload managing system." USPS-T-13, at 5.**

- (a) What is the purpose of the time standards to which you refer?**
- (b) Provide the time standards for carrier activities that resulted from the Engineered Standards/Delivery Redesign project. If final standards have not been prepared, provide any interim standards that have been developed.**
- (c) Explain how these time standards are used by the Postal Service.**
- (d) If final or interim time standards resulting from the project have not been adopted, provide the standards currently being used.**

**RESPONSE:**

**(a) The purpose of the time standards was to create standard times for performing city carrier activities based on engineered methods for use in workload managing. These time standards were installed at a few test sites and evaluated for possible future use nationwide by the Postal Service.**

**(b) See USPS-LR-I-242, produced subject to protective conditions. See Presiding Officer's Ruling No. R2000-1/15.**

**(c) See (a), above.**

**(d) See USPS-LR-I-242, produced subject to protective conditions. See Presiding Officer's Ruling No. R2000-1/15.**

**DECLARATION**

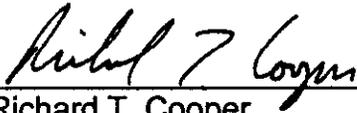
I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 3-23-00

## 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

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