

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

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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 BARON TO MPA INTERROGATORIES  
REDIRECTED FROM WITNESS KINGSLEY  
(MPA/USPS-T10-21-23)

The United States Postal Service hereby provides the response of witness Baron to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T10-21-23, filed on March 10, 2000. These interrogatories were redirected from witness Kingsley.

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



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March 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO  
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA  
REDIRECTED FROM WITNESS KINGSLEY**

MPA/USPS-T10-21. Please provide your opinion, rationale, and all available documentation on the following questions:

- (a) Has the average access time to a curblane stop changed from FY88 to FY98? If so, in what way?
- (b) Has the average access time to a park & loop stop changed from FY88 to FY98? If so, in what way?
- (c) Has the average access time to a dismount stop changed from FY88 to FY98? In so, in what way?
- (d) Has the average access time to a foot stop changed from FY88 to FY98? If so, in what way?

**RESPONSE:**

(a)-(d). The FY88 data required to answer this interrogatory are not available.

Therefore, FY89 data will substituted for FY88 data.

The following tables report average access times per actual stop for all foot, park & loop, and dismount stops combined and for all curblane stops in FYs 89 and 98.

These access times per stop are calculated as follows.

1. Total foot/park & loop access costs and total curblane access costs are obtained from the BY89 and BY98 segment 7 worksheets. The foot/park & loop access costs are regarded as costs applicable to the sum of all stops accessed by foot, including dismount stops as well as stops on the foot and park & loop sections of routes.
2. Total actual stops reported in these worksheets are split into actual stops for all dismount, park & loop, and foot stops on the one hand, and all curblane stops on the other. The dismount, park & loop, and foot stops total is estimated as total actual stops reported in the worksheets times the ratio of route/access FAT running time cost to total running time cost over all stops. Similarly, the curblane stops total is

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estimated as the total actual stops times the ratio of route/access CAT running time cost to total running time cost.

3. Access time cost per actual foot, park & loop, and dismount stop is estimated as total FAT access time cost divided by the estimated number of foot, park & loop, and dismount actual stops. Access time cost per actual curblane stop is estimated as total CAT access time cost divided by the estimated number of curblane actual stops.
4. These access time costs per stop are converted into access times per stop through the application of city carrier consolidated wage rates equal to \$19.40 for FY89 and \$25.94 for FY98.

**ESTIMATED ACCESS TIME PER ACTUAL STOP FOR FOOT,  
PARK & LOOP, AND DISMOUNT STOPS  
(Total Costs and Actual Stops are in 1,000)**

| BASE YEAR | FOOT/<br>PARK &<br>LOOP<br>ACCESS<br>COST | ESTIMATED<br>FOOT, PARK<br>& LOOP,<br>AND<br>DISMOUNT<br>ACTUAL<br>STOPS | ESTIMATED<br>FOOT/<br>PARK & LOOP<br>ACCESS<br>COST PER<br>ACTUAL STOP | ESTIMATED<br>FOOT/<br>PARK & LOOP<br>SECONDS PER<br>ACTUAL STOP |
|-----------|---|--|--|---|
| 1989      | \$1,099,118                               | 11,052,002   | \$ 0.0994  | 18.45   |
| 1998      | \$1,066,415                               | 11,218,303   | \$ 0.0951  | 13.19   |

**ESTIMATED ACCESS TIME PER ACTUAL STOP  
FOR CURBLINE STOPS  
(Total Costs and Actual Stops are in 1,000)**

| BASE YEAR | CURB<br>ACCESS<br>COST | ESTIMATED<br>CURB<br>ACTUAL<br>STOPS | ESTIMATED<br>CURB<br>ACCESS<br>COST PER<br>ACTUAL<br>STOP | ESTIMATED<br>CURBLINE<br>SECONDS PER<br>ACTUAL STOP |
|-----------|------------------------|--------------------------------------|---|---|
| 1989      | \$201,595              | 3,102,101                            | \$ 0.0650   | 12.06   |
| 1998      | \$142,257              | 4,023,861                            | \$ 0.0354   | 4.91  |

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Observe that it is not possible to further disaggregate the cost and actual stops estimates derived for the aggregate of foot, park & loop, and dismount stops into separate cost and stops estimates for foot only, park & loop only, and dismount only. The reason is that the segment 7 worksheets report only one aggregate running time cost and one aggregate access time cost for all foot and park & loop route sections combined. There are no data available that would allow one to estimate the percentages of stops on foot and park & loop route sections that are just on the foot sections, just on the park & loop sections, or accessed solely as dismount stops.

The reason access times per actual stop fell between FY89 and FY98 is the reduction in the street-time percentages for route/access FAT and route/access CAT running time costs that occurred over this period. This reduction resulted from substitution into the BY98 worksheets of the new street-time percentages presented in Docket No. R2000-1, USPS-T-13 for the old street-time percentages (first presented in Docket No. R87-1, USPS-T-7) that were applied in the BY89 worksheets.

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**MPA/USPS-T10-22. Has total (system-wide) city carrier run time (Le., route plus access time) changed between FY88 and FY98 for each of the following sets of delivery types? If so, in what way? Please provide your opinion, rationale, and all available documentation:**

- (a) Curblin deliveries**
- (b) Park and loop deliveries**
- (c) Dismount deliveries**
- (d) Foot deliveries**
- (e) Central Deliveries**

**RESPONSE**

**The deliveries data required to answer this interrogatory could not be located.**

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MPA/USPS-T10-23. For each of the following route types, has average time to travel between the delivery unit and the route changed between FY88 and FY98? If so, in what way? Please provide your opinion, rationale, and all available documentation.

- (a) Curblin routes
- (b) Park and loop routes
- (c) Dismount routes
- (d) Central routes
- (e) Foot Routes

**RESPONSE:**

(a)-(e). The available data allow for the calculation of average travel times between delivery units and routes for all park & loop routes, all foot routes, and all curblin routes. Again, no data could be located for FY88. Therefore, FY89 data are substituted for FY88 data.

The following table presents average travel times per possible stop for FY89 and FY98.

**ESTIMATED TRAVEL TIME PER POSSIBLE STOP BY ROUTE GROUP,  
FY89 TO FY98**

| FY   | ROUTE GROUP | TRAVEL TIME COST (\$1,000) | ESTIMATED TRAVEL TIME HOURS (1,000) | ESTIMATED TRAVEL TIME COST PER POSSIBLE STOP | ESTIMATED TRAVEL TIME SECONDS PER POSSIBLE STOP |
|------|-------------|----------------------------|-------------------------------------|--|---|
| 1989 | FOOT        | \$ 66,430                  | 3,424                               | \$ 0.0521                                    | 9.67  |
| 1989 | PARK & LOOP | \$ 152,973                 | 7,885                               | \$ 0.0166                                    | 3.09  |
| 1989 | CURB        | \$ 36,466                  | 1,880                               | \$ 0.0062                                    | 1.14  |
| 1998 | FOOT        | \$ 44,066                  | 1,699                               | \$ 0.0346                                    | 4.80  |
| 1998 | PARK & LOOP | \$ 260,784                 | 10,053                              | \$ 0.0284                                    | 3.94  |
| 1998 | CURB        | \$ 79,477                  | 3,064                               | \$ 0.0134                                    | 1.86  |

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Foot-route travel times decreased from FY89 to FY98 because the new foot-route travel-time percentages used in the BY98 segment 7 worksheets are lower than corresponding percentages used in the BY89 segment 7 worksheets. Park & loop and curb-route travel times increased from FY89 to FY98 because of large increases in total carrier time spent on these routes, and because the new park & loop and curb-route travel-time percentages used in the BY98 worksheets are generally equal to or only slightly lower than corresponding percentages used in the BY89 worksheets. These changes in travel-time percentages resulted from the substitution of the revised street-time percentages presented in R2000-1, USPS-T-13 into the BY98 worksheets in place of the street-time percentages, first presented in R87-1, USPS-T-7, that were used in the BY89 worksheets.

## DECLARATION

I, Donald M. Baron, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

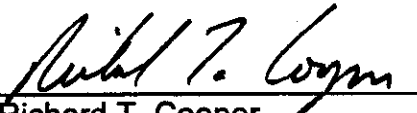
Donald M. Baron

Date: 3-24-00



## 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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March 24, 2000