

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000)
Docket No. R2000-1)
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)

**MOTION OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO COMPEL ANSWERS TO INTERROGATORIES
MPA/USPS-T13-83, 85, 86, 87, 88, 89, 90,
93, 94, 96, 97, 99, 100, 101, 106 AND 108
TO WITNESS RAYMOND**

(MARCH 30, 2000)

Magazine Publishers of America, Inc. (MPA) hereby moves for an order to compel United States Postal Service witness Raymond to provide responsive answers to MPA Interrogatories MPA/USPS-T13-83, 85-90, 93, 94, 96, 97, 99-101, 106 and 108. MPA's interrogatories were filed on March 7, 2000. The Postal Service filed the witness's responses on March 22, 2000, together with a motion for late receipt of the responses.¹ A copy of each interrogatory and the witness's response is attached to this motion as Exhibit A.

OVERVIEW

Witness Raymond's testimony has two core elements. First, he presents part of the results of a survey of delivery carrier street activities, which the Postal

^{1/} In view of the witness's identical non-response to sixteen of the twenty-eight interrogatories in this set, and his brief answers to the other twelve interrogatories, it is surprising that the Postal Service was not able to file these "responses" on time.

Service concedes "was not designed to produce information for use in an omnibus rate proceeding."² Second, he attempts to classify and allocate tallies from the survey, after the data had been collected, to fit the activity/cost definitions used in the Street-Time Survey (STS). The survey database includes more than 39,000 observations (each referred to as a "record" or "tally"). Yet there is little in the way of documentation for the survey; there were no training manuals or written instructions for the data collectors, most of whom received only on-the-job training; and the survey categories themselves are in many cases vague and overlapping.

MPA's interrogatories go to the heart of Raymond's testimony. They seek to determine: (1) what various types of tallies represent in terms of the activity the data collector was observing; (2) how the data collectors were supposed to record certain types of observed activities; and (3) why Raymond allocated these types of tallies to particular STS categories. Answers to these questions are critical to an understanding of the survey, its results, and the conclusions Raymond drew from the survey.

Yet for each of these sixteen interrogatories, witness Raymond provided an identical non-response:

"I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields."³

The scope of the witness's refusal to provide responsive answers, as explained below, is breathtaking and inexcusable.

^{2/} Opposition of United States Postal Service to Advo Motion to Compel Answers to Interrogatories ADVO/USPS-T13-2 and 19(c) to Witness Raymond, March 16, 2000, at 3.

^{3/} The reference to "Appendix A to USPS-LR-I-163" is non-helpful. For the Commission's convenience, we have attached a complete copy of that appendix to our motion as Exhibit B.

MPA regrets the necessity to file this motion to compel responsive answers to these obviously relevant and straightforward questions. In particular, we are concerned that at this stage of the proceedings, the time consumed by motion practice will substantially delay receipt of responsive answers in the event our motion is granted, impairing our ability to prepare for cross-examination. For this reason, MPA will also shortly be filing follow-up interrogatories to witness Raymond concerning his non-responsive answers, in the hope that responsive answers can be obtained more expeditiously than through the motion practice process. However, because of the possibility that the witness may again refuse to provide responsive answers to those follow-ups, this lengthier process of seeking an order to compel may be the only means to obtain responsive, although not timely, answers.

Witness Raymond's non-responsive answers will, regrettably, also increase the amount of time needed for his oral cross-examination, perhaps by a substantial amount. Had the witness given responsive answers, additional questions arising from those responses could then have been pursued through written follow-up interrogatories. Instead, our follow-ups will now necessarily be constrained to getting answers to the original interrogatories. The witness's tactic means that responsive answers will not become available until shortly before the hearing (if then), effectively foreclosing the opportunity for true follow-ups and prejudicing MPA's ability to understand and test the witness's testimony.

THE MPA INTERROGATORIES

Witness Raymond's identical answers to these interrogatories is not only non-responsive but vague. Raymond's answers do not explain *why* he cannot respond without references to specific tallies. Neither the witness nor Postal Service counsel sought any clarification as to what was being asked in the

interrogatories. For these reasons, we can only guess at what objections the Postal Service might raise to this motion to compel.

The sixteen interrogatories ask, in differing ways, a variety of questions concerning what the tallies mean, what the witness did in assigning tallies to STS categories, and why. Question 93 poses a hypothetical scenario of a carrier doing various activities, and asks the witness how data collectors would record the activities. Questions 96, 97 and 100 ask the witness to "confirm" what he did in assigning types of tallies to STS categories, and ask him to explain why. Questions 83, 85-90, 94, 99, 101, 106 and 108 refer to various types of tallies, and ask the witness to explain what the tallies mean (what the carrier was observing) and why he assigned the tallies to particular STS categories. No matter what the question or how phrased, witness Raymond's answer is the same:

"I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields."

The witness's claim that he cannot respond without references to every single tally corresponding to each question is puzzling. Raymond, himself, in assigning tallies to STS categories, apparently did *not* look at each tally individually, but instead created a computer program to assign tallies to various categories depending on language or variables contained within them. Essentially, in the interrogatories at issue here, we are asking him to explain which variables he chose, and why he chose them. If he really means that he cannot answer these core questions without referring to and analyzing each and every associated tally in the database, that, itself, is compelling evidence that this study is indefensible for postal costing purposes. To now say that the only way tallies can be understood and properly assigned to STS categories is to look at each tally individually would be to confirm that his method of

assignment was faulty. If the witness cannot answer these questions, how can the parties or the Commission be expected to be able to understand, evaluate, and test -- on the record -- either the study or witness Raymond's conclusions?

Witness Raymond's supposed need for "references to the specific records" is disproved by the few responsive answers that he has given. MPA Interrogatory 98, for example, asked him to:

"Please explain why tallies with the activity of 'No Access to Box' were allocated among the Drive, Load, and FAT Run Time categories."

This question is virtually identical in form to Interrogatories 96 and 97, asking him to "explain why" he allocated certain types of tallies to particular STS categories. Here, however, Raymond *did* provide a responsive answer, explaining why he made these allocations among the three STS categories. At the end of his answer, he then stated "I cannot respond *further* without reference to the specific records in question" (emphasis added). In this context, *having given a responsive answer*, his qualification that he cannot respond "further" without specific citations to tallies is understandable and acceptable -- and MPA's interrogatory on its face does not ask for more.

In other responses, Raymond has demonstrated his ability to locate in the database tallies corresponding to MPA's questions, *without* references to specific tallies. This is not surprising given the search and sort capabilities of the Microsoft Access® database software Raymond uses, which enable retrieval of all records matching specified criteria such as those in MPA's interrogatories. See, for example, his answer to MPA/USPS-T13-107 ("I have identified one such tally.") and MPA/USPS-T13-107 ("I have identified two tallies"). He was also able to answer other similar questions without being provided "references to the specific records in question." See, for example, MPA/USPS-T13-91, 95, 98, and

105. Nowhere has he explained why he can answer some of these questions "without references to the specific records in question," but not others. This selectivity in providing responsive answers belies the notion that he cannot answer without specific record references.

The witness, of course, is free to look at whatever database information he believes necessary in order to respond to MPA's questions. The database is readily searchable. If witness Raymond believes that the interpretation and STS classification of a particular type of tallies varies depending on other information in the database, he should provide a responsive answer explaining that variation and describing how it affects the interpretation and classification of the tallies. The one thing he cannot do is hide behind the bogus claim that he cannot respond without references to specific tallies.

Indeed, the witness's implication that MPA's interrogatories should have provided "references to the specific (database) records in question, including CY code, route ID, date, etc." is absurd. Had MPA done what the witness now suggests -- separately listing and identifying *each and every tally* that corresponded to each question -- our interrogatories would have had to list, by conservative estimate, well more than 20,000 individual tallies (including duplicate listings for tallies that correspond to more than one question).⁴ At one line of text per tally ("including CY code, route ID, date, etc."), and 50 tallies per page, this would have added more than *400 pages of tally listings* to the MPA interrogatories. Had we done so, the Postal Service's likely response to such a massive listings of individual tallies would have been an objection on the

^{4/} In the case of MPA Question 96, for example, the database contains many thousands of tallies that identify the carrier's location as "Point of Delivery." Is the witness really claiming that the only way he can answer the question is by having MPA list in its interrogatory *each and every one of the thousands of "Point of Delivery" tallies*, including for *each* one the "CY (city) code, route ID, date, etc."? To state the proposition is to refute it.

grounds of "undue burden," "irrelevance," and/or "immateriality," claiming that it is burdensome and unnecessary to review and explain every single tally in the database in order to understand either what they represent or why Raymond made his allocations to STS categories.⁵

More importantly, MPA's interrogatories clearly were not seeking explanations on a tally-by-tally basis for each individual tally in the database. We were seeking to understand what various *types* of tallies mean and why Raymond assigned those types of tallies to particular STS categories.

Finally, the Postal Service cannot claim that MPA's interrogatories are unclear in what they ask. The witness has not suggested that he does not understand the questions, and Postal Service counsel did not seek any clarification as to what was being asked. To the extent the witness believes any questions require further explanation, he is free, as part of his responses, to address his concerns and qualify his answers.⁶ That, however, is not a legitimate basis to refuse to provide responsive answers.

^{5/} Conversely, had MPA in its questions selected and identified a single "representative" tally (as opposed to all tallies) for each of these questions, the interrogatory might have been open to challenge on the ground that the particular tally chosen might not be "representative." Given the witness's blanket non-response to all of these interrogatories, it seems likely that we would have had no luck at getting responsive answers regardless of the form of our questions.

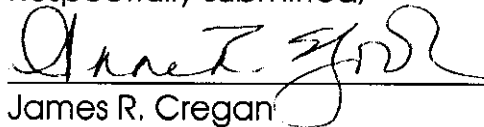
^{6/} MPA Questions 96 and 97, for example, ask Raymond to confirm that, with "minor exceptions," "virtually all tallies" with the entries "Point of Delivery" or "Del/Coll" were assigned to the STS load category. To the extent the witness may have qualms about the use of these qualifiers, he may address and quantify these aspects in his response.

CONCLUSION

Given the many serious questions surrounding the use of this study for postal costing purposes, and the tight procedural constraints imposed by the statutory ten-month deadline for decision, the last thing the parties or the Commission need is gamesmanship in responding to legitimate interrogatories. This is especially true of these interrogatories that probe the essence of Raymond's testimony: the meaning and interpretation of the database tallies, and how and why the witness assigned various types of tallies to the particular STS categories. Already, this tactic has succeeded in forestalling responsive answers by at least several weeks at a critical point in the procedural schedule -- effectively precluding the opportunity for meaningful follow-up interrogatories to his responses.

Because of the timing of these non-responsive answers -- coming at the end of the discovery period and only weeks before the start of hearings -- MPA requests that the Postal Service be directed to respond to this motion in less than the seven days normally allotted for objections, and that the Commission direct the Postal Service to provide responsive answers on an expedited basis. Counsel for MPA has communicated this request for expedition to Postal Service counsel, along with copies of this motion.

Respectfully submitted,



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Counsel

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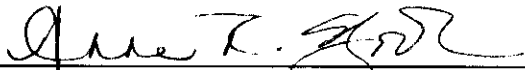
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.



Anne R. Noble

Washington DC
March 30, 2000

EXHIBIT A

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

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO MPA INTERROGATORIES
(MPA/USPS-T13-82-109)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T13-82-109, filed on March 7, 2000.


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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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March 22, 2000

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-82. For STS Type, Collection Box, please confirm that there are no tallies identifying the carrier either walking or driving to or from a collection box. Please explain why.

RESPONSE:

Confirmed. The Engineered Standards approach only required the observer to record the mode of travel.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-83. There are several tallies at "Collection Box" location which indicate unloading activities. Per Appendix D, "Unloading" (code JO9) applies to vehicles while del/coll (code J08) applies to unloading collection boxes. Please explain what the data collectors were observing when these tallies were taken and explain how you know that.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-84. When a Relay Box is also a Collection Box, how did the
data collectors indicate location?

RESPONSE:

The observers would have recorded the green boxes as a relay box and the blue
boxes as a collection box.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-85. When the Relay Box location is associated with "Wait 4 Collectn" activity or "Coll't Box" detail, how did you determine whether it should be allocated to Collection or Street Support?

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-86. For the following tally types, please explain what STS activity the data collectors were observing, how you know that, and why you assigned the specified STS category. Please note that in some cases two or more STS categories are assigned to the same combination of Location-Activity-Activity Detail. In those cases, please explain why you have made distinctions. (If same tally type is included in more than one STS category, in the list below, it is asterisked.)

| | STS Category | Location(s) | Activity(ies) | Activity Detail(s) |
|----|---------------------|-------------------------------------------------------------------|--------------------------------|---------------------------|
| a. | Drive | In Vehicle at Stop, *Park Point, Vehicle* | Delay Code (D Codes) | N/A |
| b. | Drive | In Vehicle at Stop, *Misc, On Route, *Vehicle, *Wait When Walking | Delay Codes (D Codes) | Delay Codes (I Codes) |
| c. | Drive | In Vehicle at Stop* | DelaySpcfyDetail | Delay Codes (G Codes) |
| d. | Drive | In Vehicle at Stop, Park Point, Vehicle* | N/A | Vehicle Codes (K Codes) |
| e. | Drive | Vehicle, * Misc, Wait when walking | Delay Codes (D Codes) | Vehicle Codes (K Codes) |
| f. | Drive | Misc | N/A | Central Inside |
| g. | Drive | Misc, * Park Point, Vehicle* | N/A | N/A |
| h. | Drive | On Route | Travel B/t Dlvr. | Walking Push Cart |
| i. | Drive | On Route, Vehicle* | Parcel or Accountable | Vehicle Codes (K Codes) |
| j. | Drive | On Route | Travel to 1 st Dlvr | Vehicle Codes (K Codes) |
| k. | Drive | Vehicle | Del/Coll | Vehicle Codes (K Codes) |
| l. | Drive | Vehicle* | Parcel or Accountable | Drop to Customer |
| m. | Drive | Vehicle* | Parcel or Accountable | N/A |
| n. | Drive | Vehicle | No Access to Box | Vehicle Codes (K Codes) |
| o. | CAT | In Vehicle at Stop, * Misc, On Route, | Delay Codes (D Codes) | N/A |

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
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| | | | | |
|-----|----------------|----------------------------------------------------------------|---------------------------------|----------------------------|
| | | Vehicle* | | |
| p. | CAT | In Vehicle at Stop, * In Vehicle Traffic, On Route, * Vehicle* | Delay Codes (D Codes) | Delay Codes (I Codes) |
| q. | CAT | In Vehicle at Stop, Vehicle* | Delay Codes (D Codes) | Vehicle Codes (K Codes) |
| r. | CAT | Misc | DelaySpcfyDetail | N/A |
| s. | CAT | Misc, Vehicle* | N/A | Vehicle Codes (K Codes) |
| t. | CAT | Misc, * On Route, Vehicle* | N/A | N/A |
| u. | CAT | On Route, Vehicle* | Parcel or Accountable | N/A |
| v. | CAT | On Route | Travel B/t Dlvr. | Walking Codes (K Codes) |
| w. | CAT | Point of Delivery | Travel B/t Dlvr. | Vehicle Codes (K Codes) |
| x. | CAT | Vehicle* | Parcel or Accountable | Vehicle Codes (K Codes) |
| y. | FAT | Misc, On Route | Delay Codes (D Codes) | N/A |
| z. | FAT | On Route* | Delay Codes (D Codes) | Delay Codes (I Codes) |
| aa. | FAT | Vehicle* | Delay Codes (D Codes) | Vehicle Codes (K Codes) |
| bb. | FAT | Vehicle* | Parcel or Accountable | N/A |
| cc. | FAT | Vehicle* | Parcel or Accountable | Vehicle Codes (K Codes) |
| dd. | FAT | Misc | Walking | Walking Codes (K Codes) |
| ee. | FAT | Misc | No Work | N/A |
| ff. | FAT | On Route* | N/A | N/A |
| gg. | FAT | On Route | No Access to box | N/A |
| hh. | FAT | On Route, * Vehicle* | Parcel or Accountable | Vehicle Codes (K Codes) |
| ii. | FAT | On Route, * Vehicle* | Parcel or Accountable | N/A |
| jj. | FAT | On Route | Travel B/t Dlvr. | Receptacle Codes (H Codes) |
| kk. | FAT | On Route | Travel to 1 st Dlvr. | Walking Codes (K Codes) |
| ll. | FAT | Vehicle | N/A | Mat'l Handling |
| mm. | Street Support | Misc | DelaySpcfyDetail | Delay Codes (G Codes) |
| nn. | Street | Misc* | N/A | N/A |

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

| | | | | |
|-----|-----------------------|--------------------------|------------------------------|--------------------------------|
| | Support | | | |
| oo. | Street Support | On Route, Vehicle | DelaySpcfyDetail | N/A |
| pp. | Street Support | On Route | No Work | N/A |
| qq. | Street Support | Point of Delivery | Return to unit | Vehicle Codes (K Codes) |
| rr. | Street Support | Vehicle* | N/A | N/A |
| ss. | Street Support | Vehicle | Mix | Material Handling |
| tt. | Street Support | Vehicle | Parcels | Material Handling |
| uu. | Street Support | Vehicle | Delay Codes (D Codes) | N/A |
| vv. | Street Support | Vehicle | Delay Codes (D Codes) | Union |
| ww. | Street Support | Wait When Walking | No Work | N/A |

RESPONSE:

(a-ww) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-87. For the "Vehicle" location, for foot deliveries, there are some "Travel B/t Dlvr." activity tallies with either N/A or Walk detail. In some cases, you assign those tallies to Drive Time and in some cases you assign them to the FAT Run or Street Support Time categories.

(a) With the use of a vehicle, what is the distinction between foot, park and loop, central, and dismount deliveries?

(b) What were the data collectors observing at that time and how do you know it?

(c) How did you decide to assign those tallies to the STS categories?

RESPONSE:

(a-c) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-88. For the "On Route" location, for curblin deliveries, there are some "Travel B/t Divr." activity tallies with Walk (Code K) detail. These are assigned to the CAT Run Time category.

(a) What were the data collectors observing at that time and how do you know it?

(b) How did you decide to assign those tallies to the CAT Run Time category?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-89. For the "On Route" location, there are some "Travel B/t Divr." activity tallies with Walking Push Cart detail. Some of these are assigned to the Drive Time category and some are assigned to the FAT Run Time category. Separately, there are some "Walking" and "Travel B/t Divr. w/Sort" activity tallies with "Walking Push Cart" detail assigned to the FAT Run Time category. For each of these tally types, please explain:

(a) What were the data collectors observing at those times and how do you know it?

(b) How did you decide to assign those tallies to STS categories?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-90. For the "On Route" location, with curblin deliveries, there are some "Accountable" and "Parcel" activity tallies with "LLV" detail. These are assigned to the FAT Run Time category. Please explain:

- (a) What were the data collectors observing at those times and how do you know it?
- (b) How did you decide to assign those tallies to the FAT Run Time category?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-91. Please confirm that you allocate no tallies indicating Curblin
Delivery type to Drive Time.

RESPONSE:

Confirmed that there are no tallies indicating Curblin Delivery type to Drive time.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-92. Can you tell when the "Travel B/t Dlvr." tally occurred
between a curblin and another type of deliver? If so, please explain.

RESPONSE:

Yes, the observers had the USPS Form 3999x that lists the entire route with
delivery types by delivery point.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-93. Assume a carrier has just stopped his vehicle at a parking point for either a set of Central or Dismount deliveries within a single building:

- (a) If he has not yet left the vehicle, what location would a data collector record: In Vehicle at Stop, On Route, or Vehicle?
- (b) If he is working at his vehicle (e.g., unloading a tray of mail), what location would a data collector record?
- (c) If he has left the vehicle and is proceeding to make his deliveries but has not yet gotten to the first delivery, what location would a data collector record?
- (d) If he has reached the first delivery and is moving towards the next, what location would a data collector record?
- (e) If he is returning to his vehicle from the last delivery on that stop, what location would a data collector record?

RESPONSE:

(a-e) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-94. With some minor exceptions, virtually all tallies, regardless of Location Code, which have "Delay Specify Detail" or N/A activity with a Code G activity detail (e.g., public relations, service rates, directions, excess words), have been allocated to Load.

(a) Please explain why you have done this.

(b) Please explain why a few of these types of tallies were also allocated to Street Support and Drive Time.

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-95. Please confirm that all the "Hardship" activity tallies have been allocated to Load. Please explain why you have done this.

RESPONSE:

This appears to be the case. Generally, because the "Hardship" activity requires customer contact, it falls within Load Time. See Appendix F to my testimony. I cannot respond further without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-96. Please confirm that, with only minor exceptions, virtually all tallies for the "Point of Delivery" location were allocated to the Load or Street Support category. Please explain why you have done this.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-97. Please confirm that, with the exception of Collection and Relay Box Locations, virtually all Del/Coll tallies were allocated to the Load or Street Support category. Please explain why you have done this.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-98. Please explain why tallies with the activity of "No Access to Box" were allocated among the Drive, Load, and FAT Run Time categories.

RESPONSE:

It appears, with respect to "No Access to Box", in allocating the tallies to Load, the carrier was at the point of delivery. In allocating a tally to driving time, the carrier was in his vehicle on a park and loop route. In allocating tallies to route access/Fat, the tallies show the carrier on route, and not associated with a vehicle. I cannot respond further without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-99. Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the "Load" category:

| | Location | Delivery Type | Activity(ies) | Detail(s) |
|----|------------------------|----------------------------------------|--------------------------------|-------------------------------|
| a. | N/A | Central | Del/Coll | Central Outside |
| b. | N/A | N/A | Del/Coll | Central Inside |
| d. | On Route | Central | N/A | Central Inside |
| e. | On Route or Park Point | Any Delivery Type (WT Codes) | Del/Coll or Finger @ Delivery | Any Receptacle Type (H Codes) |
| g. | On Route | Curb | Accountable | #1 Box |
| h. | On Route | Curb | Del/Coll | Drop to Customer |
| i. | On Route | Curb | Del/Coll | Walking |
| j. | On Route | Curb | Parcel | Drop to Customer |
| k. | On Route | Dismount | Accountable | Flat Receptacle |
| l. | On Route | Dismount | Finger @ Delivery | Walk Flat |
| m. | On Route | Dismount | Parcel or Accountable | Walk Flat |
| n. | On Route | Dismount | Walking | Walk Flat |
| o. | On Route | Park & Loop | Accountable | Walk Flat |
| p. | On Route | Park & Loop | Del/Coll | Walk Flat |
| q. | On Route | Park & Loop | Del/Coll | N/A |
| r. | On Route | Park & Loop | Finger @ Delivery | Walk Flat |
| t. | Point of Delivery | Central | Accountable | Flat Receptacle |
| u. | Point of Delivery | Any Delivery Type (WT Codes) | Parcels, Parcel or Accountable | N/A |
| v. | Point of Delivery | Central | Del/Coll | Drop to Customer |
| w. | Point of Delivery | Any Delivery Type (WT Codes) | Del/Coll | N/A |
| x. | Point of Delivery | Central | N/A | Central Inside |
| y. | Point of Delivery | Any Delivery Type (WT Codes) | N/A | N/A |
| z. | Point of Delivery | Central, Dismount, Foot or Park & Loop | Setup | Vehicle Codes (K Codes) |

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

| | | | | |
|-----|-------------------|------------------------------------|-------------------------------|---------------------------------|
| aa. | Point of Delivery | Central | Travel B/t Divr. | Central Outside |
| bb. | Point of Delivery | Central | Walking | Central Inside or Outside |
| cc. | Point of Delivery | Central | Walking | Walk Flat |
| dd. | Point of Delivery | Curb | Del/Coll | 1 Handed Slot |
| ee. | Point of Delivery | Curb | Del/Coll or Finger @ Delivery | Drop to Customer |
| ff. | Point of Delivery | Any Delivery Type (WT Codes) | Del/Coll or Finger @ Delivery | Vehicle Codes (K Codes) |
| gg. | Point of Delivery | Any Delivery Type Codes (WT Codes) | Travel B/t Divr. | Walk of Vehicle Codes (K Codes) |
| hh. | Point of Delivery | Curb | Travel B/t Divr. | Walk Flat |
| ii. | Point of Delivery | Dismount | Parcel or Accountable | Walk Codes (K Codes) |
| jj. | Point of Delivery | Dismount | Delay (D Code) | Gang Box |
| kk. | Point of Delivery | Dismount | Travel B/t Divr. | Any Receptacle Type (H Codes) |
| ll. | Point of Delivery | Any Delivery Type Codes (WT Codes) | Del/Coll | Walk Code (K Codes) |
| mm. | Point of Delivery | Park & Loop | Travel B/t Divr. | 1 Hand Slam |
| nn. | Vehicle | Curb | Del/Coll or Finger @ Delivery | Receptacle Codes (H Codes) |
| oo. | Vehicle | Central, Dismount, Park & Loop | Del/Coll or Finger @ Delivery | Receptacle Codes (H Codes) |
| pp. | Vehicle | Central, Dismount, Park & Loop | Del/Coll or Finger @ Delivery | Vehicle Codes (K Codes) |
| qq. | Vehicle | Curb | Del/Coll | Drop to Customer |
| rr. | Vehicle | Curb | Del/Coll Or Finger @ Delivery | Vehicle Codes (K Codes) |
| ss. | Vehicle | Dismount | Parcel | Drop to Customer |
| tt. | Vehicle | Dismount | Travel B/t | Drop to Customer |

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

| | | | | |
|--|--|--|-------|--|
| | | | Divr. | |
|--|--|--|-------|--|

RESPONSE:

(a-tt) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-100. Please confirm that you assigned the "Street Support" category to all tallies with:

- (a) Dock, Gas Station, In Unit Walking, PBL, or Relay Box locations.
- (b) Loading or Unloading activity, regardless of location.
- (c) Materials Handling activity detail.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-101. Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the "Street Support" category.

| Location | Activity | Activity Detail |
|-----------------------------|------------------|-------------------------|
| Misc, Park Point or Vehicle | Loading | Vehicle Codes (K Codes) |
| Misc | Setup | Walking Push Cart |
| On Route | Setup | Walking |
| Park Point, Vehicle | Setup | N/A |
| Park Point, Vehicle | Unloading | Vehicle Codes (K Codes) |
| Vehicle | Loading | N/A |
| Vehicle | Travel B/t Dlvr. | Walk Flat |
| Vehicle | Travel B/t Dlvr. | Vehicle Codes (K Codes) |

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-102. Should the out-of-office time for each route-day, particularly those for motorized carriers, begin with some sort of Street Support (i.e., "Loading/Setup" or Travel to First Delivery activity) and end with some sort of Street Support (i.e., "Return to Unit" or "Unloading" activity) time? Please explain, If a route-day does not begin or end in this manner, what does it indicate?

RESPONSE:

In the typical carrier's typical day, I agree that carriers perform loading and setting up, travel to first delivery, return to unit and unloading. The work sampling process, where the scan is taken every six minutes, may not capture, on a specific day, these particular activities.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-103. Should the out-of-office time for each route-day contain some Personal or Administrative (PBL) time? Please explain. If a route-day does not include any PBL time, what does it indicate?

RESPONSE:

Not necessarily. The carrier may take PBL time in the office, before going to the street, or after returning from the street. PBL time may also be taken sporadically throughout the street time, but not have been identified at the moments the work samplings were taken. On occasion, there may be carriers that did not take any personal time or break time.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-104. For out-of-office time, if there is no lengthy break in the tally times (one every six minutes or so) for lunch breaks, what does that indicate? Please explain.

RESPONSE:

Lunch break tallies were deleted from the database provided to witness Baron, these tallies did not fall into the STS categories described in Appendix F.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-105. For the "Dock" location, there are "set up" activities. Appendix D describes "setup" as "relocating mail form (sic) rear of vehicle to front, loading satchel."

(a) Please explain what the data collectors were observing when they indicated "setup" on the Dock.

(b) Please explain how "setup" differs from "loading" on the Dock.

RESPONSE:

(a) The carriers after loading the trays or tubs to the rear of the vehicle would then load the satchel while still at the dock.

(b) Setup is loading the satchel or moving trays to the front of the vehicle. Loading is moving trays from a hamper or nutting truck to the rear of the vehicle.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-106. There (sic) Park Point location tallies which indicate central, curblin, or dismount delivery types. Per Appendix D, you state that the "Park Point" location applies to park and loop "routes". Please clarify, what were the data collectors indicating when they assigned the "Park Point" location?

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-107. There is a "Relay Box" location tally that has a "Wait 4 Collection" activity. Please explain what specific activity the data collectors were observing when they took this tally.

RESPONSE:

I have identified one such tally. This tally involves a foot route. It is possible that the carrier arrived at the relay box before the mail arrived for him to deliver his next loop.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-108. There are a lot of vehicle location tallies for dismount deliveries with "setup" activity. Per Appendix D, you state that setup is "relocating mail form [sic] rear of vehicle to front, loading satchel." But, Appendix D also states that Dismount is serving one or more customers by dismounting and without use of a satchel. Please explain what specific activity the data collectors were observing when they took these tallies.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-109. For the "In Unit Walking" locations, the activity is "loading" which is described in Appendix D as "putting mail into vehicle". Please explain what specific activity the data collectors were observing when they took these tallies.

RESPONSE:

I have identified two tallies involving "In Unit Walking" where the activity is "loading." The data collectors were probably observing a carrier inside the unit, either on his way out to load a vehicle, or on his way back in to get more mail to load the vehicle.

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: 3-22-00

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 22, 2000

EXHIBIT B

RECEIVED

JAN 12 9 59 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

ENGINEERED STANDARDS DATABASE

LIBRARY REFERENCE USPS-LR-I-163

Appendix A

C:\RATES\Rates Final 1-6-00.mdb
Table: Rates

Friday, January 07, 2000
Page: 1

Properties

| | | | |
|---------------|----------------------|-----------------|------|
| Date Created: | 1/7/2000 11:20:42 AM | Def. Updatable: | True |
| Last Updated: | 1/7/2000 11:40:52 AM | OrderByOn: | True |
| RecordCount: | 39046 | | |

Columns

| Name | Type | Size |
|------------------------|---------------|------|
| UnitCode | Text | 5 |
| RoutNumberCode | Text | 5 |
| Job_Classification | Text | 16 |
| SiteLocationCode | Text | 5 |
| Site_Location | Text | 16 |
| 48 | Date/Time | 8 |
| 49 | Date/Time | 8 |
| PersonalCode | Text | 5 |
| Personal | Text | 16 |
| DeliveryTypeCode | Text | 5 |
| Non_Job_Administration | Text | 16 |
| DeliveryStatusCode | Text | 5 |
| Job_Administration | Text | 16 |
| ActivitiesCode | Text | 5 |
| Activities | Text | 16 |
| ActivitiesDetailCode | Text | 5 |
| Work_Type | Text | 16 |
| File | Number (Long) | 4 |
| STS Type | Text | 50 |

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

RECEIVED
MAR 28 4 20 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS BARON TO MPA INTERROGATORIES
(MPA/USPS-T12-37-40)**

The United States Postal Service hereby provides the response of witness Baron to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T12-37-40, filed on March 14, 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

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
March 28, 2000

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

MPA/USPS-T12-37. Please explain why you did not re-estimate the CAT/FAT (Curbline Access/Foot Access Test) split factors to reflect the 1998 possible stops coverage levels. With respect to the CAT split factors, please confirm the following. If you do not confirm, please explain why:

(a) Residential and Curbline SDR, MDR, and B&M stops coverages, estimated from the City Carrier Cost System (CCS), are used with the estimating models.

(b) That you assume that all stops on the routes described in (a) are curbline stops.

(c) Drive Time, as measured from Mr. Raymond's Engineered Standards database, is not reflected in the CAT models.

RESPONSE:

The CAT/FAT split factors were not reestimated because changes in coverage levels between BY 1996 and BY 1998 were considered insignificant.

(a) I confirm that SDR, MDR, and BAM coverage ratios calculated for the combination of all residential and mixed curbline routes are substituted into the curb running time model to derive CAT split factors.

(b) Not confirmed. The BY 1996 coverages are calculated in Docket No. R97-1, USPS-H-143. This analysis derives a separate set of coverages by stop type (SDR, MDR, and BAM) for each of three route groups – curb, foot, and park & loop. For each combination of a route group and stop type, coverage is calculated as the total number of actual stops divided by the total number of possible stops. Total actual and possible stops by stop type are calculated as total actual and possible stops recorded over all CCS tests conducted on all CCS routes falling within the given route group.

The curb-route group consists of all residential curbline and mixed curbline routes. Therefore, total actual and possible SDR stops in the curb-route group are calculated as total stops recorded over all CCS tests conducted on residential curb and

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

mixed curb routes, including tests at stops accessed by foot as well as tests at stops accessed by vehicle. So the SDR coverage ratio for the curblines group is the coverage of all possible SDR stops on curblines routes, not just curb stops.

Similarly, MDR and BAM coverage ratios for the curb-route group do not equal the percentages of just the curblines stops that are accessed. Again, they equal the coverage percentages of all possible stops on curblines routes across all stop types.

(c) Confirmed. The CAT (i.e., curblines) regression is used to estimate route-access split factors that are applied solely to the cost of time carriers spend driving along the curblines sections of routes. These split factors are not applied to driving time costs.

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

MPA/USPS-T12-38. With respect to the FAT Foot split factors, please confirm the following. If you do not confirm, please explain why:

(a) Business, Residential, and Mixed SDR, MDR, and B&M stops coverages, as estimated from the City Carrier Cost System (CCS), are used with the estimating models.

(b) That you assume that all stops on the routes described in (a) are FAT foot stops.

RESPONSE:

(a) I confirm that SDR, MDR, and BAM coverage ratios calculated for the combination all residential, business, and mixed foot routes are substituted into the foot-route running time model to derive foot-route split factors.

(b) Not confirmed. See my response to 37(b). The SDR, MDR, and BAM coverage ratios applied to the foot-route running time equation do not equal the percentages of just the total possible foot stops located on foot routes. These ratios equal the coverage percentages of all possible stops on these routes.

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

MPA/USPS-T12-39. With respect to the Park & Loop FAT split factors, please confirm the following. If you do not confirm, please explain why:

(a) Business Motorized, Residential Park & Loop, and Mixed Park & Loop SDR, MDR, and B&M stops coverages, estimated from the CCS, are used with the estimating models.

(b) That you assume that all stops on the routes described in (a) are FAT Park & Loop stops.

(c) Drive Time, as measured from Mr. Raymond's Engineered Standards database, is not reflected in the Park & Loop FAT models.

RESPONSE:

(a) I confirm that SDR, MDR, and BAM coverage ratios calculated for the combination of all business motorized, residential park & loop, and mixed park & loop routes are substituted into the park & loop running time equation to derive park & loop split factors.

(b) Not confirmed. See my responses to 37(b) and 38(b). The SDR, MDR, and BAM coverage ratios applied to the park & loop running time equation do not equal the percentages of just the possible park & loop stops located on all business motorized and park & loop routes. The coverage ratios instead equal the coverage percentages of all possible stops on these routes.

(c) Confirmed. The park & loop running-time regression is used to estimate route-access split factors that are applied solely to the cost of time carriers spend walking along the park & loop sections of park & loop, curblin, and business motorized routes. These split factors are not applied to driving time costs.

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

MPA/USPS-T12-40. With respect to the Drive Time category, as measured from Mr. Raymond's Engineered Standards:

- (a) Please confirm that it represents both Drive Time associated with Park & LOOP stops as well as the Drive Time associated with Dismount Stops. If this is incorrect, please explain.**
- (b) Does it also represent the Drive Time associated with motorized Central, NDCBU, and VIM stops? Please explain.**
- (c) Please confirm that the Drive Time described in (a) and (b) above is not reflected in any of the CAT/FAT models.**
- (d) Please confirm that the Drive Time described in (a) and (b) above, and as measured from Mr. Raymond's Engineered Standards database, is attributed by the USPS on the basis of the R97-1 analyses of Drive/Stop, Stop/Activity, Deviation Delivery/Piece, and Routine Loops and Dismounts/Volume Variabilities.**

RESPONSE:

(a)-(b) Confirmed in the sense that the driving time activity category accounts for all carrier time spent driving along all sections of the route other than curblines sections.

(However, driving time excludes time spent driving from delivery units to the beginning of routes or from routes back to delivery units). Moreover, the CAT/FAT models are not applied to driving time costs. They are applied solely to the costs of driving along curblines sections of routes and walking along non-curblines sections of routes.

(c). Confirmed. The CAT/FAT models apply only to time that carriers spend walking on routes or driving along the curblines sections of routes.

(d). Confirmed.

DECLARATION

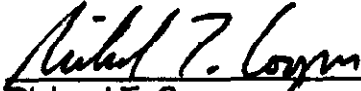
I, Donald M. Baron, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Donald M. Baron

Date: 3-28-00

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 28, 2000