

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

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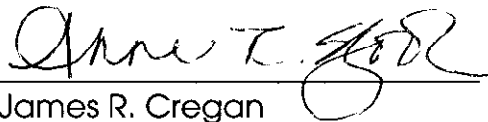
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**FOURTH SET OF INTERROGATORIES (FOLLOW-UP)  
OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS RAYMOND  
(MPA/USPS-T13-110-127)**  
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**(March 30, 2000)**

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories (MPA/USPS-T13-110-127) which follow-up on responses of USPS Witness Raymond filed on March 22 and received by MPA on March 23, 2000.

Respectfully submitted,



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**FOURTH SET OF INTERROGATORIES (FOLLOW-UP) OF MAGAZINE PUBLISHERS  
OF AMERICA TO UNITED STATES POSTAL SERVICE WITNESS RAYMOND**

**MPA/USPS-T13-110.** Please refer to your responses to MPA/USPS-T13-107 and 109.

- (a) In preparing your responses to those two interrogatories, explain how were you able to find and identify specific tallies in the database that corresponded to MPA's questions, without having "references to the specific records in question, including CY code, route ID, date, etc."
- (b) In view of the fact that you were able to find and identify tallies that corresponded to those two MPA interrogatories, explain why you were not able to do the same with respect to each of the following MPA interrogatories:
  - (1) Interrogatory MPA/USPS-T13-83?
  - (2) Interrogatory MPA/USPS-T13-85?
  - (3) Interrogatory MPA/USPS-T13-86?
  - (4) Interrogatory MPA/USPS-T13-87?
  - (5) Interrogatory MPA/USPS-T13-88?
  - (6) Interrogatory MPA/USPS-T13-89?
  - (7) Interrogatory MPA/USPS-T13-90?
  - (8) Interrogatory MPA/USPS-T13-94?
  - (9) Interrogatory MPA/USPS-T13-96?
  - (10) Interrogatory MPA/USPS-T13-97?
  - (11) Interrogatory MPA/USPS-T13-99?
  - (12) Interrogatory MPA/USPS-T13-100?
  - (13) Interrogatory MPA/USPS-T13-101?
  - (14) Interrogatory MPA/USPS-T13-106?
  - (15) Interrogatory MPA/USPS-T13-108?

**MPA/USPS-T13-111.** Please refer to your response to MPA/USPS-T13-98.

- (a) In preparing your response to that interrogatory, explain how you were able to respond without having "references to the specific records in question, including CY code, route ID, date, etc." If you were you able to find and identify specific tallies in the database that corresponded to MPA's question, explain how you did so.
- (b) In view of the fact that you were able to respond to that MPA interrogatory without having references to the specific records in question, explain why you were not able to do the same with respect to each of the fifteen MPA interrogatories listed in the preceding interrogatory MPA/USPS-T13-110.

**MPA/USPS-T13-112.** MPA/USPS-T13-83 and your response were as follows:

MPA/USPS-T13-83. There are several tallies at "Collection Box" location which indicate unloading activities. Per Appendix D, "Unloading" (code J09) 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.

- (1) Please confirm that there are tallies that identify the carrier location as Collection Box (L10) and the activity detail as Collection Box (H15), but that some list the activity as Unloading (J10) while others list the activity as Delivery/Collection (J08). If you cannot confirm, please explain why not.
- (2) Please confirm that Appendix D defines "Unloading" (code J10 rather than J09) as "Taking empty trays, tubs, collected mail etc out of *vehicle* typically at the end of day" (emphasis added).
- (3) Please explain how this Unloading activity, as defined in Appendix D, can be associated with a Collection Box location, and describe what the carrier was doing in these circumstances.
- (4) For the Collection Box location, explain the difference between tallies that show Unloading activity and those that show Delivery/Collection activity, in terms of what the carriers were doing at the time.
- (5) Please specify completely your decision rules with respect to allocating tallies to the STS category of Collection.

**MPA/USPS-T13-113.** MPA/USPS-T13-85 and your response were as follows:

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.

- (1) Please explain what tallies with Relay Box location and "Wait 4 Collectn" activity or "Coll't Box" detail represent (i.e., what the carrier was doing at the time).
- (2) Please explain how you determined whether such tallies should be allocated to Collection or Street Support. Provide any decision rules you used and explain their bases.

**MPA/USPS-T13-114.** MPA/USPS-T13-86 presented a table (reproduced below) showing various types of tallies that you allocated to the Drive, CAT, FAT, and Street Support categories. It asked:

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.)

You responded "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 purpose of that interrogatory was to gain an understanding of what these types of tallies represent (i.e., what the data collectors were observing), how that can be determined from the tally, and why you assigned these tallies to the different STS categories.

Please respond to the original question for each of the types of tallies in the table below. For each tally type, provide in narrative form (not just data codes) your best understanding of what the data collector was actually observing. If that cannot be determined or you are unsure, please so state. If additional kinds of tally information not contained in the table are needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.

Explain for each subpart why you have assigned the tally type to the particular STS category. If the final assignment was based on an algorithm or decisional rule (e.g., all tallies with "x" activity" are Drive Time), please provide and explain it.

	STS Category	Location(s)	Activity(ies)	Activity Detail(s)
a.	Drive	In Vehicle at Stop,* Park Point, Vehicle*	Delay Codes (D Codes)	N/A
b.	Drive	In Vehicle at Stop,* Misc, On Route,* Vehicle,* Wait	Delay Codes (D Codes)	Delay Codes (I Codes)

		When Walking		
c.	Drive	In Vehicle at Stop*	DelaySpckyDetail	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 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, Vehicle*	Delay Codes (D Codes)	N/A
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	DelaySpckyDetail	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 Dlvr.	Walking Codes (K Codes)
ll.	FAT	Vehicle	N/A	Mat'l Handling
m m	Street Support	Misc	DelaySpckyDetail	Delay Codes (G Codes)

nn.	Street Support	Misc*	N/A	N/A
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

**MPA/USPS-T13-115.** MPA/USPS-T13-87 and your response were as follows:

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:**

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.

- (1) For tallies that identify the carrier’s location as “Vehicle,” the delivery type as “Foot,” the activity as “Travel B/t Dlvr.,” and the activity detail as either “N/A” or a “Walking” code (codes K09-K11), please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time. If additional kinds of tally information not contained above are needed for

an understanding, please identify that information and explain how it helps to understand what the observation represents.

- (2) Appendix D defines the "Foot" delivery type as "Used on foot walkout routes or foot routes that used public transportation and relay boxes to acquire their mail." Explain what the data collector was observing in the case of a tally that indicates the carrier's location as "Vehicle" and the route type as "Foot."
- (3) Explain what the data collector was observing in the case of a tally with the "Vehicle" location and a "Walking" activity detail.
- (4) Please explain how you determined whether such tallies should be allocated to the Drive Time, FAT Run Time or Street Support Time categories. Provide any decision rules you used and explain their bases.

**MPA/USPS-T13-116.** MPA/USPS-T13-88 and your response were as follows:

MPA/USPS-T13-88. For the "On Route" location, for curblin deliveries, there are some "Travel B/t Dlvr." 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:**

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.

- (1) For tallies that identify the carrier's location as "On Route," the delivery type as "Curblin," the activity as "Travel B/t Dlvr.," and the activity detail as a "Walking" code (codes K09-K11), please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time. If additional kinds of tally information not contained above are needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.
- (2) Please explain how you determined that such tallies should be allocated to the CAT Run Time category. Provide any decision rules you used and explain their bases.

**MPA/USPS-T13-117.** MPA/USPS-T13-89 and your response were as follows:

MPA/USPS-T13-89. For the "On Route" location, there are some "Travel B/t Dlv." 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 Dlv. 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:

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.

- (1) For tallies that identify the carrier's location as "On Route," the activity as "Travel B/t Dlv.," and the activity detail as "Walk Push Cart" (code K04), please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time. If additional kinds of tally information not contained above are needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.
- (2) Please explain how you determined whether such tallies in (1) above should be allocated to the Drive Time or FAT Run Time category. Provide any decision rules you used and explain their bases.
- (3) For tallies that identify the carrier's location as "On Route," the activity as "Walking" or "Travel B/t Dlv. w/Sort," and the activity detail as "Walk Push Cart" (code K04), please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time. If additional kinds of tally information not contained above are needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.
- (4) Please explain how you determined whether such tallies in (3) above should be allocated to the FAT Run Time category. Provide any decision rules you used and explain their bases.



**MPA/USPS-T13-118.** MPA/USPS-T13-90 and your response were as follows:

MPA/USPS-T13-90. For the "On Route" location, with curblines 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:**

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.

- (1) For tallies that identify the carrier's location as "On Route," the delivery type as "Curblines," the activity as "Accountable" or "Parcel," and the activity detail as "LLV (Long Life Truck)," please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time, and how you can determine that from the tally information. If the explanation depends on other information in the tally that is not shown above, please identify that information. If you cannot tell what the carrier was doing from the tally information, please so state.
- (2) Please fully explain your decision rules and rationale for allocating the kind of tallies described above to the FAT Run Time category. If the allocation varies depending on other information in the tally, please enumerate those factors and explain how that other information affects the allocation to the different STS categories.

**MPA/USPS-T13-119.** MPA/USPS-T13-93 and your response were as follows:

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:**

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.

- (1) This is a hypothetical question concerning relatively routine carrier activities, which asks you to indicate for each subpart the "location" the data collector would record. Please explain the relevance and necessity for "references to specific records" in order to respond.
- (2) Please respond to subparts (a)-(e) of the original question as if you were observing each of those instants of time and scanning the observation into your activity sampling database. If your answer to a particular subpart would vary depending on other information not contained in the question, please enumerate that other information and explain how it would affect the "location" that would be recorded. If you cannot respond, please explain fully why not.

**MPA/USPS-T13-120.** MPA/USPS-T13-94 and your response were as follows:

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:**

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.

- (1) Please confirm that with minor exceptions, virtually all tallies, regardless of Location Code, which have "Delay Specify Detail" or N/A activity with a Code G activity detail, have been allocated to the Load category.
- (2) Please fully explain your decision rules and rationale for allocating tallies which have "Delay Specify Detail" or N/A activity with a Code G activity detail to the STS Load, Street Support, and Drive Time categories. If the allocation varies depending on other information in the tally, please enumerate those factors and explain how that other information affects the allocation to the different STS categories.

**MPA/USPS-T13-121.** MPA/USPS-T13-96 and your response were as follows:

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.

- (1) How many tallies in the database that have the "Point of Delivery" location were allocated to the Load or Street Support categories? If you do not have a precise number of such tallies, please provide an approximate number (e.g., hundreds, thousands, five thousand, or more?)
- (2) The first sentence of MPA/USPS-T13-96 asked for a confirmation that you allocated virtually all tallies with the "Point of Delivery" location to the Load or Street Support category. The second sentence asks you to explain why you have done this. Explain why is it necessary to have references to "the specific tallies in question" to answer the question.
- (3) Please respond to both sentences of the original question. If you are reluctant to confirm the first sentence because of the qualifiers "minor exceptions" and "virtually all," please quantify the percentage of total Delivery Point tallies that were allocated to the Load or Street Support category.

**MPA/USPS-T13-122.** MPA/USPS-T13-97 and your response were as follows:

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.

- (1) With the exception of Collection and Relay Box locations, how many "Del/Coll" tallies in the database were allocated to the Load or Street Support categories? If you do not have a precise number of such tallies, please provide an approximate number (e.g., hundreds, thousands, five thousand, or more?)
- (2) The first sentence of MPA/USPS-T13-97 asked for a confirmation that, except for Collection and Relay Box locations, you allocated virtually all "Del/Coll" tallies to the Load or Street Support category. The second sentence asks you to explain why you have done this. Is it your position that you cannot respond without references to all of "the specific tallies in question." If so, please explain why.
- (3) Please respond to both sentences of the original question. If you are reluctant to confirm the first sentence because of the qualifier "virtually all," please quantify the percentage of total Del/Coll tallies that were allocated to the Load or Street Support category.

**MPA/USPS-T13-123.** MPA/USPS-T13-99 presented a table (reproduced below) showing various types of tallies that you allocated to the Load category. It asked you to "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." You responded "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 purpose of that interrogatory was to gain an understanding of what these types of tallies represent (i.e., what the data collectors were observing), how that can be determined from the tally, and why you assigned these tallies to the Load category. For example, subpart r. below identifies "On Route" carrier location, "Park & Loop" delivery type, "Finger @ Delivery" activity, and "Walk Flat" detail. However, it is unclear from that information where the carrier was and what the carrier was actually doing at the time of the observation, and why you have assigned it to Load.

Please respond to the original question for each of the types of tallies in the table below. For each tally type, provide in narrative form (not just data codes) your best understanding of what the data collector was actually observing. If that cannot be determined or you are unsure, please so state. If additional tally information not contained in the table is needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.

Explain for each subpart why you have assigned the tally type to Load. If the final assignment was based on an algorithm or decisional rule (e.g., all tallies with “x” activity” are Load), please provide and explain it.

	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	N/A
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 Code (K Codes)
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 (WT Codes)	Travel B/t Dlv.	Walk or Vehicle Codes (K Codes)
hh.	Point of Delivery	Curb	Travel B/t Dlv.	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 Dlv.	Any Receptacle Type (H Codes)
ll.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll.	Walk Code (K Codes)
mm.	Point of Delivery	Park & Loop	Travel B/t Dlv.	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 Dlv.	Drop to Customer

**MPA/USPS-T13-124.** MPA/USPS-T13-100 and your response were as follows:

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.

- (1) This question asked for a confirmation of what you did. Explain why is it necessary to have references to specific tallies to answer this question.

- (2) Please respond to parts (a) and (c) of the original question.

**MPA/USPS-T13-125.** MPA/USPS-T13-101 and your response were as follows:

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.

**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.

- (1) Please explain what these types of tallies represent (i.e., what the carrier was doing at the time), and how you can determine that from the tally information. If the explanation depends on other information in the tally that is not shown above, please identify that information. If you cannot tell what the carrier was doing from the tally information, please so state.
- (2) Please fully explain your decision rules and rationale for allocating the kind of tallies described above to the FAT Run Time category. If the allocation varies depending on other information in the tally, please enumerate those factors and explain how that other information affects the allocation to the different STS categories.

	<b>Location</b>	<b>Activity</b>	<b>Activity Detail</b>
	Dock	Travel B/t Dlvr	LLV
	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)

**MPA/USPS-T13-126.** MPA/USPS-T13-106 and your response were as follows:

MPA/USPS-T13-106. There [are] 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.

- (1) Please confirm that Appendix D to your testimony defines "Park Point" as "The point where the vehicle is parked on Park and Loop routes."
- (2) Please confirm that there are tallies that identify the carrier's location as "Park Point" and the delivery type as either "Central," "Curblines," or "Dismount."
- (3) Please clarify what the data collectors were observing (where the carrier was and what the carrier was doing) when they assigned the Park Point location in these circumstances.

**MPA/USPS-T13-127.** MPA/USPS-T13-108 and your response were as follows:

**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:**

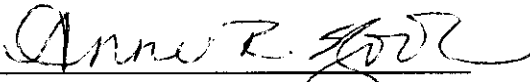
I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

- (1) Please confirm that Appendix D to your testimony defines "Setup" as "Relocating mail form [sic] rear of vehicle to front, loading satchel."
- (2) Please confirm that Appendix D to your testimony defines "Dismount" as "Serving one or more customers by dismounting and without use of a satchel."
- (3) For these tallies, please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time, and how you can determine that from the tally information. If the explanation depends on other information in the tally that is not shown above, please identify that information.



**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, D.C.  
March 31, 2000