

ORIGINAL

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

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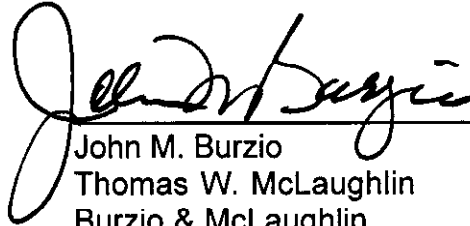
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

FOLLOW-UP INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
LLOYD RAYMOND (ADVO/USPS-T13-111-136)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Lloyd Raymond. These follow-up on his responses to MPA Interrogatories MPA/USPS-T13-57-109, received on March 23, 2000. If the witness is unable to respond to any interrogatory, we request that a response be provided by an appropriate USPS witness capable of providing an answer.

Respectfully submitted,



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CERTIFICATE OF SERVICE

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



Thomas W. McLaughlin

March 30, 2000

ADVO, INC. FOLLOW-UP INTERROGATORIES TO USPS WITNESS RAYMOND

ADVO/USPS-T13-111. In response to MPA/USPS-T13-57, you state that, when the 6-minute beep occurred, the observer took an instant snapshot of the carrier's activity and scanned in the observation as soon as possible. On page 6 of your testimony, you state that your Stage 1 process design included a task inventory which included:

- "1) Followed carriers from time of arrival at the station (clock-in) to end of the day (clock-out). Teams also traced routes from start to finish.
- "2) Compiled a list of activities performed/route information and arranged the list into a hierarchy.
- "3) Returned to the stations to follow carriers to insure the hierarchy reflected activities performed/route characteristics.
- "4) Adjusted hierarchy and finalized flow-process charts with a data collection structure. *Refer to Appendix A.*" (Italics in original)

. . . "The work sampling data identified the frequency of occurrence of an activity, which translated into the percent of time a carrier spent performing certain activities."

With respect to these "instants," activities, and hierarchy, please confirm the following or explain fully why you cannot and provide all corrections. If none of the following are correct, please explain fully how Appendix A of your testimony relates to your activity sampling data collection and your testimony.

- (a) The list of activities and hierarchy to which you refer on page 6 are represented in Appendix A on page 17 of your testimony (and similarly in the flowcharts presented in LR I-220).
- (b) For purposes of the original activity sampling data collection, the intent of collecting data was to categorize time proportions (i.e., instants of time) into the general sets of activities described by the rectangles and circles in Appendix A.
- (c) Numerous specific carrier activities can be encompassed within each of the general sets of activities described by the rectangles and circles in Appendix A (for example, according to your response to MPA/USPS-T13-109, the Appendix A term, "Load Vehicle," includes moving full hampers/containers from unit across dock to vehicle, physically moving mail from hampers/containers into vehicle, rearranging mail/containers within vehicle, moving empty hampers/containers from vehicle, across dock, and back to unit; the Appendix A term, "Drive to Park Point,"

includes any driving for any delivery type except driving among curblines deliveries).

- (d) Although the data collectors took "snapshots" of carrier activity being observed, the codes used to describe those "snapshots" were designed to categorize each snapshot into one of the general sets of activities (represented by either one of the rectangles or one of the circles in Appendix A).

ADVO/USPS-T13-112. In response to MPA/USPS-T13-57, you state that, when the 6-minute beep occurred, the observer took an instant snapshot of the carrier's activity and scanned in the observation as soon as possible. Please confirm the following or provide a correction.

- (a) With the exception of L18 (In Unit Walking), none of the Level 10 Location codes indicate specific physical actions on the part of the carrier -- only that carrier actions occurred at these locations at the instants of time being observed.
- (b) None of the Level 11.1 (Personal or Administrative), Level 11.2 (Delivery Type), or Level 11.3 (Delivery Type Status) codes, provided in LR I-163, indicate specific physical actions on the part of the carrier at the instants of time being observed.
- (c) The D01 (No Access to Box), D02 (Vehicle Breakdown), D04 (Weather), D05 (Traffic/Detour), D06 (No Work), D08 (Delay Specify) activity codes do not indicate specific physical actions on the part of the carrier -- only that these conditions were somehow associated with a carrier activity at the instants of time being observed.
- (d) The F03 (Hardship), F04 (Delay-Specify) activity codes do not indicate specific physical actions on the part of the carrier -- only that a hardship service or delay was somehow associated with a carrier activity at the instants of time being observed.
- (e) The F01 (Accountable), F02 (Parcel), J04 (Parcels), and J06 (Mix) activity codes do not indicate specific physical actions on the part of the carrier -- only that accountable, parcel, parcels, or mix of mail was somehow associated with a carrier activity at the instants of time being observed.
- (f) The T00-T04 Travel activity codes do not indicate, by themselves, how the carrier was physically moving or, even, whether the carrier was actually moving.

ADVO/USPS-T13-113. With respect to the 933 video tapes mentioned in MPA/USPS-T13-58:

- (a) Were tapes made of the entire route day for some or all routes? Please explain how much time was taped per day on average.
- (b) Please confirm that one of the observers on the team of two observers always took the videotape.
- (c) The number of videotapes exceeds the number of route-days. Please explain.

ADVO/USPS-T13-114. MPA/USPS-T13-60 requested, for each route day, the observer codes for all data collectors that collected data on that specific route day. Your response indicates that you have provided that information in response to MPA/USPS-T13-16.

- (a) Please confirm that your response to MPA/USPS-T13-16 provides no CY codes or dates and does not provide sufficient data points to reflect all route days in your LR I-163 data base.
- (b) Please provide, in spreadsheet format, the observer codes for each data collector for each route day in LR I-163.

ADVO/USPS-T13-115. MPA/USPS-T13-60 requests identification of data collectors which had previous experience (in projects other than the one in which the activity sampling data were collected) in observing postal delivery carriers for purposes of identifying specific activities. Your response states that OBS12 and OBS13 had collected data with the scanner on other non-postal clients.

- (a) Were OBS12 and OBS13 the only data collectors that had scanner experience on other than this project?
- (b) Did any of the other data collectors have experience in observing postal delivery carriers for purposes of identifying or measuring specific carrier activities? If so, please identify each individual by observer code and provide a brief description of his experience.

ADVO/USPS-T13-116. Your responses to:

- MPA/USPS-T13-61 and 62 suggest that USPS LR I-220 (Engineered Standards Book of Forms/Pictures) explains how to identify and distinguish among each of the Level 10 Locations in Appendix D.

- MPA/USPS-T13-64 suggest that USPS LR I-220 explains how to identify and distinguish among specific Level 11.2 Delivery Types.
- MPA/USPS-T13-78 suggest that USPS LR I-220 explains how Level 11.3.1 Activity Detail codes should be associated with Level 11.4 Activity codes.

Please confirm that LR I-220 contains only the following. If you cannot, please explain why not and make all necessary corrections.

- (a) Fourteen pages of sample USPS forms, none of which demonstrate how to identify Locations, Delivery Types, Activity, or Activity Detail codes.
- (b) Eight pages of diagrams of which five are diagrams of in-office activities.
- (c) A "Delivery-Basic" diagram that covers only three route types (park & loop, walking, curbside) but does not explain how to identify them (as either Level 11.2 or Level 11.3 codes), provides no explanation of when one location or delivery type begins and the other ends, provides no explanation of when one activity begins and the other ends, and provides no explanation of how to apply the various (Level 11.4.1) activity detail codes.
- (d) A "Delivery - Accountable" diagram that does not use any terms which are identical with the codes in your Appendix D, other than the Level 11.4 code for "Parcel" (F02), provides no explanation of when one location or activity begins and the other ends, and provides no explanation of how to apply the various (Level 11.4.1) activity detail codes.
- (e) A "Collection" diagram that does not use any terms which are identical with the codes in your Appendix D, other than the Level Location code for "Collection Box," and the Level 11.4.1 code for "Collection Box," provides no explanation of when one location or activity begins and the other ends, and provides no explanation of how to apply the various (Level 11.4.1) activity detail codes.
- (f) Four pages of sample maps.
- (g) Thirteen pages of in-unit photographs, none of which show the dock or demonstrate when the dock (Level 10) location begins or ends.
- (h) Seven pages of vehicle photographs, none of which explain how to determine when vehicle location (Level 10) codes should be used.

- (i) Four pages of photographs of collection and relay boxes, none of which explain how to determine when collection/relay box (Level 10) location codes should be used.
- (j) Fifteen pages of photographs of mail receptacles, none of which explain how to determine when various location codes (e.g., vehicle, point of delivery, on route, in vehicle at stop, other route) should be used, how to determine when various activity codes should be used, and none of which (with the exception of gang box) show how to identify specific receptacle codes.
- (k) Fifteen pages of photographs of mail in containers and various mail receptacles, none of which can be related to any of the Location, Delivery Type, Activity, or Activity Detail codes.

ADVO/USPS-T13-117. Your responses to:

- MPA/USPS-T13-61 and 62 suggest that USPS LR I-220 (Engineered Standards Book of Forms/Pictures) explains how to identify and distinguish among each of the Level 10 Locations in Appendix D.
- MPA/USPS-T13-78 suggest that USPS LR I-220 explains how Level 11.3.1 Activity Detail codes should be associated with Level 11.4 Activity codes.

Please confirm that LR I-220 contains no photographs of any carriers at any locations and no photographs of any carrier activities. If you cannot, please explain why not and provide all necessary corrections.

ADVO/USPS-T13-118. In response to MPA/USPS-T13-61 and 52, you state that "the oral instructions provided to the observers" on how to identify and distinguish among the Level 10 Location codes "are as shown in Appendix D to my testimony." On page 26, Appendix D, you state that Location Code L09, Park Point, is "the point where the vehicle is parked on Park and Loop routes." However, on page 17, Appendix A, you show "Park Points" for Central Inside, Central Outside, Dismount, and Park and Loop routes. There also appear to be Park Point locations for non-Park and Loop routes in the LR I-163 database. Despite the Appendix D definition, please confirm that your data collectors scanned the Park Point L09 code when the carrier parked at many different locations and not just on loops. If you cannot, please explain why not.

ADVO/USPS-T13-119. MPA/USPS-T13-69(e) asked for an explanation of why the data collectors assigned delivery type and delivery type status codes to locations that

were not at the point of delivery. Based on your best belief and understanding of what the data collectors were instructed to do:

- (a) Please explain the distinction between the tallies with delivery type and delivery type status codes and those that do not have such codes.
- (b) Please provide all reasons for collecting that delivery type and delivery type status codes for non-Point of Delivery locations.

ADVO/USPS-T13-120. Your response to MPA/USPS-T13-65 indicates that, based on USPS 3999X delivery types, when moving from one kind of delivery type/status to another kind of delivery type/status, the observer would change the delivery type when traveling to the next (new) delivery type/status. MPA/USPS-T13-69(c) and (d) requested all systematic guidance given to the data collectors on how to identify delivery type and delivery type status when the carrier was not at the point of delivery. For the following, please provide your best belief and understanding. If you do not know the answer, please so state. If no instructions were given, please so state.

- (a) For all carrier activities prior to the first delivery of the day, did the observers scan the delivery type/status for the first possible (as opposed to actual) delivery of the day? Please explain.
- (b) For all carrier activities after the last delivery of the day, did the observers scan the delivery type/status for the last possible (as opposed to actual) delivery of the day? Please explain.
- (c) If a delivery was typically curblines but, on the observed route-day, a parcel or accountable had to be dropped to the address, were the data collectors instructed to scan curblines type (with either outside residential or business status) or to scan dismount (with inside residential or business status)? Please explain.
- (d) If a delivery was typically central, park & loop, or foot, and the delivery status was typically outside residential or business, but on the observed route-day, a parcel or accountable had to be dropped to the address, were the data collectors instructed to scan outside residential or business or inside residential or business? Please explain.
- (e) In response to MPA/USPS-T13-91, you confirm that there are no tallies allocating Curblines Delivery type to Drive Time. In response to MPA/USPS-T13-92 you confirm that the observers could tell when a curblines set of deliveries was coming up. Do these facts mean that, on the observed routes, curblines deliveries always preceded other motorized delivery types and the observed carriers never drove from another delivery type to a curblines set of deliveries? Please explain.

ADVO/USPS-T13-121. In response to MPA/USPS-T13-74(c), you state that Level 11.4 Activity code F01 (Accountable) means that the carrier is handling, delivering, or processing an accountable type of mail.

- (a) Please confirm that F01 does not necessarily mean that the carrier was preparing mail to place into a mail receptacle, inserting mail into a receptacle or handing mail to an addressee at the observed instant of time. If you cannot, please explain why not.
- (b) Please confirm that "delivering" as used in your statement is used broadly in the sense that the carrier intends to get the accountable to the addressee and does not mean physically placing the accountable in the addressee's hands or mail receptacle. If you cannot, please explain why not.

ADVO/USPS-T13-122. In response to MPA/USPS-T13-75(c), you state that Level 11.4 Activity Code F02 (Parcel) means that the carrier is handling, delivering, or processing a parcel type of mail.

- (a) Please confirm that F02 does not necessarily mean that the carrier was preparing mail to place into a mail receptacle, inserting mail into a receptacle, or handing mail to an addressee at the observed instant of time. If you cannot, please explain why not.
- (b) Please confirm that "delivering" as used in your statement is used broadly in the sense that the carrier intends to get the accountable to the addressee and does not mean physically placing the parcel in the addressee's hands or mail receptacle. If you cannot, please explain why not.

ADVO/USPS-T13-123. In response to MPA/USPS-T13-76(c), you state that Level 11.4 Activity Code J04 (Parcels) means that the carrier is handling, delivering, or processing a parcel type of mail.

- (a) Please confirm that J04 does not necessarily mean that the carrier was preparing mail to place into a mail receptacle, inserting mail into a receptacle, or handing mail to an addressee at the observed instant of time. If you cannot, please explain why not.
- (b) Please confirm that "delivering" as used in your statement is used broadly in the sense that the carrier intends to get the parcels to the addressee and is not intended to mean physically placing the parcels in

the addressee's hands or mail receptacle. If you cannot, please explain why not.

ADVO/USPS-T13-124. In response to MPA/USPS-T13-57, you state that, when the 6-minute beep occurred, the observer took an instant snapshot of the carrier's activity and scanned in the observation as soon as possible. Please refer to your response to MPA/USPS-T13-36 where you state that the Level 11.4 Activity Code of "Finger @ Delivery" (J12) includes ". . . the actions of the carrier obtaining the mail while at the delivery point from the hand, and/or arm, and/or satchel, verifying the mail, and depositing the mail." For purposes of your activity sampling data collection:

- (a) Please confirm that your MPA/USPS-T1-36 definition differs from the one previously provided in Appendix D. The response includes obtaining mail, verifying the mail, and depositing the mail while the Appendix D definition indicates that only "fingering through the mail to verify the address is correct and collecting the mail to deposit" is observed.
- (b) Please confirm that only one of the actions described in (a) above may have been observed at a specific instant of time, when the "Finger @ Delivery" code was scanned. If you cannot, please explain why not.
- (c) To your best belief and understanding, were there any other actions that may have also been observed when the "Finger @ Delivery" barcode was scanned? Please explain.
- (d) If the code for "Finger @ Delivery" includes the action of depositing the mail, then, to the best of your belief and understanding, please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the "Delivery/Collection" (J08) code. If this may vary by delivery type (e.g., curblines vs. park & loop), please explain fully.

ADVO/USPS-T13-125. In Appendix D, you describe Code J09, Loading, as putting mail into a vehicle. In response to MPA/USPS-T13-105, you state that "Loading is moving trays from a hamper or nutting truck to the rear of the vehicle."

- (a) In response to MPA/USPS-T13-109, you state that there were J09 (Loading) tallies where 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." Please confirm that, according to your definition, such tallies do not accurately record the observed instant of time as a Loading activity.

- (b) Please confirm that there are code J09 Loading tallies at Level 10 Relay Box (L11) locations. If you cannot, please explain why not.
- (c) Please confirm that there are code J09 Loading tallies at Level 10 Park Point (L09) locations. If you cannot, please explain why not.
- (d) Please confirm that there are code J09 Loading tallies at Level 10 Miscellaneous (L15) locations, where (per your response MPA/USPS-T13-63) Miscellaneous locations are such areas as elevators, phone booths, supervisor's desks, customer's lawn, locked keys in vehicle, in vehicle parking lot due to no work. If you cannot, please explain why not.
- (e) Please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the "Loading" (J09) code. If you cannot, please so state.

ADVO/USPS-T13-126. In response to MPA/USPS-T13-105, you state that "Setup" (Activity Code J11) is "loading the satchel or moving trays to the front of the vehicle." Please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the "Setup" (J11) code.

ADVO/USPS-T13-127. In Appendix D, you describe Activity Code J10, Unloading, as "Taking empty trays, tubs, collected mail etc. out of vehicle typically at the end of day."

- (a) Please confirm that there are Code J10 Unloading tallies at both Level 10 Collection Box (L10) and Relay Box (L11) locations. If you cannot, please explain why not.
- (b) Please confirm that there are code J10 Unloading tallies at Level 10 Miscellaneous (L15) locations, where (per your response MPA/USPS-T13-63) Miscellaneous locations are such areas as elevators, phone booths, supervisor's desks, customer's lawn, locked keys in vehicle, in vehicle parking lot due to no work. If you cannot, please explain why not.
- (c) Please confirm that there are code J10 Unloading tallies at Level 10 Park Point (L09) locations. If you cannot, please explain why not.
- (d) Please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the Unloading" (J10) code. If you cannot, please so state.

ADVO/USPS-T13-128. In response to MPA/USPS-T13-67(c), you state that "The T05 code [walking] was used when the carrier was walking other than the other defined codes." The other Activity codes were T01 Travel to First Delivery Point, T02 Travel b/t Delivery, and T03 Travel b/t w/Sort.

- (a) Please confirm that there are walking code (T05) tallies at both On Route (L13) and Point of Delivery (L12) locations. If you cannot, please explain why not.
- (b) Among a set of park & loop deliveries within one loop, under what typical circumstances do you believe your data collectors may have scanned the T05 code? If you cannot identify the typical circumstances, please explain fully why not.
- (c) On a dismount delivery, under what typical circumstances do you believe your data collectors may have scanned the T05 code? If you cannot identify the typical circumstances, please explain fully why not.
- (d) On a set of foot deliveries within one relay, under what typical circumstances do you believe your data collectors may have scanned the T05? If you cannot identify the typical circumstances, please explain fully why not.
- (e) On a central delivery, under what typical circumstances do you believe your data collectors may have scanned the T05 code? If you cannot identify the typical circumstances, please explain fully why not.

ADVO/USPS-T13-129. In response to MPA/USPS-T13-80, you state that the Code H activity details (i.e., mail receptacles) describe the receptacle or collection box near the carrier. Please confirm that these codes do not necessarily mean the carrier was physically handling a receptacle at the instant of time observed. If you cannot, please explain why not.

ADVO/USPS-T13-130. For the Code K activity details (i.e., Jeep, LLV, Walking, Walk Flat, etc.), please provide your belief as to the observers' interpretation of the following:

- (a) Did any of the vehicle codes (i.e., Jeep, LLV, 1 or 2 ton truck, pickup/van, bus, automobile, elevator) mean the carrier is physically inside or moving the vehicle, doing something with the vehicle (i.e., locking it or pulling mail out of the back), or simply near the vehicle? Please explain.
- (b) What were the differences among the "Walking" (K09), "Walk Flat" (K10), and "Walk Obstructed" (K11) codes?

ADVO/USPS-T13-131. Please refer to your response to MPA/USPS-T13-94 where you state that you cannot, without specific records, explain why virtually all the Code G activity detail (e.g., public relations, service rates, directions, excess words) were allocated to the STS Load category.

- (a) Please confirm that when a Code G Activity Detail was scanned, that does not necessarily mean that the carrier, at that instant, was physically handling mail, a mail satchel/container (other than physically carrying it), or a mail form.
- (b) Please confirm that the Activity code associated with a Code G Activity Detail (such as Activity Code F04 "Delay Specify"), does not provide any additional information to determine whether the carrier was physically handling mail, a mail satchel/container (other than physically carrying it), or a mail form.
- (c) Please confirm that a Code G Activity Detail can occur at many different Locations, and not just at Point of Delivery.

ADVO/USPS-T13-132. In response to MPA/USPS-T13-57 (b), 61(b), 64(b), and 67(f), questions regarding the systematic efforts made to ensure that the codes were consistently and correctly applied by all data collectors, you state that "USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes."

- (a) Please describe the qualifications of a roving quality assurance person and state whether such a person was a Resource & Process metrics, Inc. employee, an employee of another consulting firm, or a USPS employee.
- (b) Were USPS Subject Matter Experts and roving quality assurance personnel used in both Phases 1 and 2? Please explain and provide the number of such experts and number of quality assurance personnel in Phases 1 and 2, separately.
- (c) Was some portion of each route-day observed by a USPS Subject Matter Expert and a roving quality assurance person? If not, please identify the route-days for which a portion of time was observed by either a USPS Subject Matter Expert or roving quality assurance person.
- (d) Typically, when observed, how much of a route-day was observed by a USPS Subject Matter Expert or roving quality assurance person?

- (e) Was some portion of each route-day cross-checked with the time study records, observer comments and video tapes? If not, please identify the route-days that were cross-checked by each method.
- (f) Were the cross-checks performed by both the USPS Subject Matter Experts and roving quality assurance personnel? If not, who performed the cross-checks?
- (g) Typically, how much of a route-day was cross-checked by a USPS Subject Matter Expert, roving quality assurance person, or some other person?
- (h) Were you a roving quality assurance person and did you personally cross-check any of the time study records, observer comments and video tapes?

ADVO/USPS-T13-133. Interrogatories MPA/USPS-T13-86 and 99 provided lists of types of tallies grouped by the STS categories to which they had been assigned, and asked you to explain why you assigned them to the particular STS category. You declined to respond on the ground that "I cannot respond without references to the specific records in question, including CY code, route ID, date, etc." As an alternate approach to help understand in general terms your assignments of various types of tallies to STS categories (including the tally types listed in MPA-86 and MPA-99), please refer to your testimony at page 14 where you discuss your initial manual assignment of STS categories to the tallies, followed by your creation of a "master list" of scan sequences grouped by STS category, which you state was used "to crosscheck the manual review process." In response to ADVO/USPS-T13-22(c) which asked you to provide the master list of scan sequences, you responded "Please refer to Appendix D and Appendix F of my testimony."

- (a) Please confirm that Appendix D does not contain the "master list" of scan sequences grouped by STS category, because it does not contain any information about STS categories.
- (b) Please refer to Appendix F and the table below. This table lists, for each STS category, the "Locations" shown in your Appendix F (in the second column) compared to the "Locations" that are found in the LR I-163 database (in the third column). Please confirm that this is an accurate list of the Locations by STS category shown in Appendix F and appearing in LR I-163. If you cannot confirm, please explain why not.
- (c) Please confirm that some of the locations that appear in LR I-163 but not in your Appendix F also appear on the MPA interrogatories (e.g., MPA/USPS-T13-86(w), (qq), (ww)).
- (d) Please explain why the location information by STS category in Appendix F differs from the location information in the LR I-163 database.

STS Categories	Locations Listed in USPS-T-13 Appendix F	Locations Included in LR I-163
Load Time	On Route Point of Delivery Vehicle	On Route Point of Delivery Vehicle Park Point Other Route Miscellaneous In Vehicle at Stop N/A
Street Support Time	Dock Gas Station Vehicle PBL On Route Relay Box Park Point Collection Box Miscellaneous	Dock Gas Station Vehicle PBL On Route Relay Box Park Point Miscellaneous In Unit Walking In Vehicle at Stop In Vehicle Traffic N/A Point of Delivery Wait When Walking
Driving Time	Vehicle In Vehicle at Stop On Route Park Point Miscellaneous	Vehicle In Vehicle at Stop On Route Park Point Miscellaneous Wait When Walking
CAT	Vehicle In Vehicle at Stop On Route In Vehicle Traffic Miscellaneous	Vehicle In Vehicle at Stop On Route In Vehicle Traffic Miscellaneous Other Route Point of Delivery
FAT	On Route Miscellaneous Wait While Walking	On Route Miscellaneous Wait While Walking Vehicle Park Point
Collection	Collection Box	Collection Box Miscellaneous On Route

ADVO/USPS-T13-134. Please refer to the preceding interrogatory and Appendix F to your testimony. The table below lists, for each STS category, the "Activities" shown in your Appendix F (in the second column) compared to the "Activities" that are found in the LR I-163 database (in the third column).

- (a) Please confirm that this is an accurate list of the Activities by STS category shown in Appendix F and appearing in LR I-163. If you cannot confirm, please explain why not.
- (b) Please confirm that some of the Activities that appear in LR I-163 but not in your Appendix F also appear on the MPA interrogatories (e.g., MPA/USPS-T13-86(kk), (ww); MPA/USPS-T13-99(n), (aa), (bb), (cc), (gg), (kk), (tt)).
- (c) Please explain why the Activities information by STS category in Appendix F differs from the Activities information in the LR I-163 database.

STS Categories	Activities Listed in USPS-T-13 Appendix F	Activities Included in LR I-163
Load Time	Delivery/Collection Parcel Finger @ Delivery Setup Accountable Delay Specify	Delivery/Collection Parcel Finger @ Delivery Setup Accountable Delay Specify N/A Delay Specify Detail Walking Hardship No Access to Box Travel Between Deliveries Travel Between Deliveries with Sort
Street Support Time	Loading Unloading Setup Travel to 1 st Delivery Return to Unit Delay Specify	Loading Unloading Setup Travel to 1 st Delivery Return to Unit Delay Specify Delay Soecify Detail Delivey/Collection N/A Walking Mix Travel Between Deliveries No Work Wait 4 Collection Parcels Mix

STS Categories	Activities Listed in USPS-T-13 Appendix F	Activities Included in LR I-163
Driving Time	Travel Between Deliveries Traffic/Detour Delay Vehicle Breakdown Setup	Travel Between Deliveries Traffic/Detour Delay - Specify Vehicle Breakdown Parcel Travel to First Delivery N/A Delay Specify Detail Accountable Delivery/Collection No Access to Box Weather
CAT	Travel Between Deliveries Traffic/Detour Delay Specify	Travel Between Deliveries Traffic/Detour Delay Specify Vehicle Breakdown Delay Specify Detail Parcel Accountable N/A Weather
FAT	Travel Between Deliveries N/A Accountable Parcel	Travel Between Deliveries N/A Accountable Parcel Delay Specify Walking No Work No Access to Box Travel Between Deliveries with Sort Travel to 1 st Delivery
Collection	Delivery/Collection Setup Unloading Wait for Collection	Delivery/Collection Setup Unloading Wait for Collection

ADVO/USPS-T13-135. In view of the disparity in the Locations and Activities by STS category between (i) your Appendix F, and (ii) both the LR I-163 database as shown in Advo Interrogatories 133-134 and the tally types listed in MPA/USPS-T13-86 and 99 [which you say you cannot respond to without specific tally references], please respond to the following:

(a) At page 14 of your testimony, you discuss the process by which you assigned STS categories to the observations in the database, beginning with a line-by-line manual assignment. At page 14 (lines 18-20), you then state:

"To crosscheck the manual review process, a master list was created of scan sequences. The sequences were grouped according to STS activity. All scan sequence possibilities for an STS activity were assigned a 1-6 code."

Is your Appendix F, in fact, the "master list" of scan sequences, as you claimed in your response to ADVO/USPS-T13-22(d)?

- (b) We have not been able to replicate either a "master list" of scan sequences or your Appendix F. Explain precisely, in a step-by-step manner sufficiently detailed to allow other parties to follow and replicate your results, how you created this "master list" of scan sequences "grouped according to STS activity."
- (c) What was the source for creation of the "master list" of scan sequences? If it was something other than the database developed in the initial manual review process, please provide the source materials in their entirety, and explain how those source materials were used to create the "master list."
- (d) Please provide a copy of the "master list" created by the process described in subparts (b) and (c) above. If you claim that Appendix F is the "master list," please explain how Appendix F was created so that other parties might replicate it.
- (e) With respect to your use of the "master file" to "crosscheck the manual review process" (Testimony at page 14, line 18), Webster's Third New International Dictionary defines "cross-check" as "to check (as data, reports, statements) from various angles or sources to determine accuracy or validity." Is your use of the term "crosscheck" consistent with this definition?
 - (1) If so, explain why.
 - (2) If not, please explain more precisely what you meant by the term "crosscheck."
- (f) Please state whether or not the "crosscheck" procedure you describe checked the database developed in the manual sequence review step "to determine accuracy or validity" of the manual STS entries. If your answer is anything other than "No,"
 - (1) Please explain precisely how your crosscheck procedure checked the accuracy or validity of either the observed database entries or the manual STS entries.
 - (2) Please identify each and every record or tally in LR I-163 where the "crosscheck" procedure resulted in either (i) a change in the STS

category assigned to the tally or (ii) a change in the other observer-recorded fields of the tally. For each such change, please provide the original information before the change, and explain why the change was made.

- (g) In your testimony, from page 14 line 20 through page 15 line 2, you state that after creation of the "master list" of scan sequences:

"An update query was then used to assign the sequences a code in the database. These codes appear in the Library Reference USPS-LR-I-163 with the column header 'STS Type.' "

- (1) Please confirm that this quoted statement is inconsistent with your statement at page 14, lines 16-17, that "The column 'STS Type' contains definitions entered by manual sequence review."
- (2) Please confirm that the codes you refer to at page 15 are numeric codes, not text fields.
- (3) Please confirm that these numeric codes appear in LR I-163 under the column header "File," not under the column header "STS Type."
- (4) Please confirm that the information in the LR I-163 database under the column header "STS Type" consists of the STS category entries "entered by manual sequence review" described at page 14, lines 13-16. If you do not confirm,
 - (i) Please identify each and every record or tally in LR I-163 where the actual STS category shown in the "STS Type" field differs from the STS category that was manually entered in the initial "manual sequence review."
 - (ii) For each such record, please provide the STS type that was initially entered manually, and the different STS type that appears in LR I-163.
 - (iii) For each such record, please explain at what point in the process described at pages 14-15 the STS type was changed, the reason for the change, and the methodology by which it was changed.

If you cannot confirm any of (1)-(4) above, please explain fully why not, including an explanation of the correct meaning and content of the "File" and "STS Type" column headers, and the source and derivation of the STS-related information contained in those fields.

- (h) At page 14 line 19 through page 15 line 2, you state that after the “master list” of scan sequences was created,

“All scan sequence possibilities for an STS activity were assigned a 1-6 code. An update query was then used to assign the sequences a code in the database. These codes appear in the Library Reference USPS-LR-I-163 with the column header ‘STS Type.’ ”

Please respond to the following with respect to this “update query.”

- (1) Provide and describe the full Microsoft Access[®] query or queries that you actually used.
 - (2) What information does the “update query” actually update? Please be specific, and provide examples of the results of the “update query” process.
 - (3) Explain precisely, in a step-by-step manner sufficiently detailed to allow other parties to follow and replicate your results, how you created this update query, what the update query does, and how it is executed.
 - (4) Was the “update query” designed or intended to either flag for review, check the accuracy, or change in any manner (i) any of the observer-entered data in the database, or (ii) any of the manual STS assignments made during the initial “manual sequence review?” If so,
 - (i) Please explain how the update query flags for review, checks for accuracy, or changes the database information in any manner.
 - (ii) Please identify each and every record in LR I-163 where, as a result of the “update query” process, the actual STS category shown in the “STS Type” field was changed from the STS category that was manually entered in the initial “manual sequence review,” and for each such record provide the original manually-entered STS type.
 - (iii) Please identify each and every record in LR I-163 where, as a result of the “update query” process, changes were made to any of the observer-entered information, and for each such record provide the original observer-entered information.
- (i) Please explain, on a step-by-step basis, precisely how a party, working with the collected tally information contained in all but the last two fields of the LR I-193 database (“File” and “STS Type”), can replicate your assignments of tallies to the various STS categories. For each step,

- (1) Please provide (and explain in plain language) all programs, formulas, queries, algorithms, etc. that are used in that step of the replication,
 - (2) Please explain the rationale or logic underlying such programs, etc.
 - (3) Please explain precisely how a party would apply and execute the programs to reproduce your STS assignment results.
- (j) Please refer to the following:
- Subparts (a)-(i) of this interrogatory and your responses thereto, and
 - Your "responses" to MPA Interrogatories MPA/USPS-T13-83, 85-90, 93, 94, 96, 97, 99-101, 106 and 108, where you state that you cannot respond to questions concerning the interpretation and STS classification of types of tallies or even hypothetical questions "without references to the specific records in question, including CY code, route ID, date, etc."

Is your inability to address questions about the STS classification of *types* of tallies without references to the specific tallies related in any manner to the possibility that the actual STS Type entries in LR I-163 are, in the case of each of the 39,046 records, the result of the manual, line-by-line assignment described in your testimony at page 14, lines 13-17? Please explain.

ADVO/USPS-T13-136. Please refer to MPA/USPS-T13-104. You state that lunch break tallies were deleted from the databases provided to witness Baron. It appears that tallies for other personal break observations were also deleted prior to the activity sampling data being converted to the LR I-163 data set.

- (a) Please confirm that other personal break tallies were also deleted.
- (b) Were any other types of out-of-office tallies also deleted? If so, please explain fully.
- (c) Please explain how one can determine from the LR I-163 data set the extent to which carriers took lunch or other personal breaks.
- (d) Please explain how one can determine from the LR I-163 data set the number of workhours the carriers spent out-of-office.