

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

RECEIVED  
APR 20 3 05 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY


\_\_\_\_\_  
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-T13-140-148)


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 Advo Interrogatories received on April 13, 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,

  
\_\_\_\_\_  
John M. Burzio  
Thomas W. McLaughlin  
Burzio & McLaughlin  
1054 31st Street, N.W.  
Washington, D. C. 20007  
Counsel for ADVO, INC.

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

April 20, 2000

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

ADVO/USPS-T13-140. In your response to ADVO/USPS-T13-75, you state that an "Arrow" key is required to open a group of central boxes. In response to MPA/USPS-T13-66, you state that "deliveries that were classified as Central required the carrier to exit the vehicle." In response to ADVO/USPS-T13-78, you state that a "drop to customer" receptacle code is used when the carrier drops mail to a central mailroom.

- (a) Can one assume that if the carrier was loading either an NDCBU or a Central Box with an Arrow key, the Delivery Type could be either "Central" or "Dismount" but the receptacle code associated with that type of delivery should be either "central outside" or "central inside?" Please explain.
- (b) Would an NDCBU or Central receptacle requiring an "Arrow" key always be identified as either a "central outside" or "central inside" activity detail? If not, what other receptacle codes could be involved? Please explain.
- (c) If a tally indicates a "Central" delivery type with a delivery/collect activity code and a "drop to customer" activity detail code, can such a tally be assumed to be a routine delivery (i.e., not associated with accountable/parcel/hardship service) to a multiple-address delivery point? Please explain.
- (d) If a tally indicates a "Dismount" delivery type with a delivery/collect activity code and a "drop to customer" activity detail code, can the tally be assumed to represent a routine delivery (i.e., not associated with accountable/parcel/hardship service)? Please explain.
- (e) With respect to the "drop to customer" code associated with a dismount delivery, was this code used only when the carrier was physically handing the mail to the customer or physically placing it on the customer's counter/reception space (i.e., it was not used by an observer to indicate that the carrier was moving from a routine delivery point to a non-routine drop point)?
- (f) Please confirm that a "drop to customer" activity detail code on a foot, curb, dismount or park & loop delivery type can occur at either a single or a multiple address delivery. If that is incorrect, please explain fully.
- (g) For tallies indicating "drop to customer" activity detail, regardless of the activity code associated with it, please confirm that the observed delivery could have been either a routine delivery (i.e., mail is dropped to the customer on every day that the delivery is covered) or a non-routine

delivery caused by a particular service (i.e., parcel, accountable, hardship). If that is incorrect, please explain fully.

ADVO/USPS-T13-141. Please refer to your response to ADVO/USPS-T13-81 describing in more detail the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status Codes. If a carrier made a non-routine delivery, for example he had to dismount to drop a parcel when the delivery point was routinely served by curblin, would the observer record the delivery type as curblin or dismount?

ADVO/USPS-T13-142. Please refer to your response to ADVO/USPS-T13-81 describing in more detail the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status Codes. There you state that the "11.2 and 11.3 levels could be N/A if the carrier's travel path was returning to unit, moving the vehicle to load, loading at the unit, traveling to lunch, or to other places where the carrier is not associated with a delivery type."

- (a) Please explain why there would be a N/A delivery type associated with a physical delivery to a mail receptacle or customer.
- (b) Please explain why there would be a N/A delivery type status associated with a physical delivery to a mail receptacle or customer.

ADVO/USPS-T13-143. Please refer to your responses to UPS/USPS-T13-7 and ADVO/USPS-T13-76. The tally in the UPS question is:

CY50	8735	Vehicle	12:26	Dismount	Business Inside	Parcel	Drop to Customer
------	------	---------	-------	----------	-----------------	--------	------------------

- (a) Please confirm that, to prepare your response to both questions, you had to identify the date of the tally in question from the LR I-163 database and then pull hardcopy documents from your Merrifield, VA, depository.
- (b) Please confirm that the date for the tally you discuss in response to both questions is July 5, 1997.
- (c) Please confirm that the tally you have identified has the delivery status of "Resident Outside" while the UPS tally in question has the delivery status of "Business Inside."

ADVO/USPS-T13-144. Please refer Attachment 1 to of your response to  
ADVO/USPS-T13-76.

- (a) Please confirm that this sheet is the one printed out by the data collector and mailed to the data processor. If this is incorrect, please identify the source of this particular sheet.
- (b) Is the observation on the fourth row down the description of the tally (with Resident Outside as the Status) which is the subject of your responses? If it is not, please identify the correct row.
- (c) Please confirm that in Attachment 1 there were (originally) two 12:20 PM Vehicle scans (one on the third row and one on the fourth row) and both were initialed, while there was only one 12:26 PM scan and that was for the Level 11.01 Personal or Administrative code on the fourth row. If you cannot, please explain why not.
- (d) On the fourth row, the time associated with the Vehicle location scan (edited to be Point of Delivery) appears to be 12:20 PM, while the rest of the scans in that row appear to be scattered over several minutes, up to 12:28 PM. The location scan on the third row (directly above the fourth row) also has a 12:20 PM time.
  - (i) Are these correct interpretations of what is on this sheet? If not, please explain what is occurring.
  - (ii) Please explain why both the third and fourth row have the same scan time for the location code.
  - (iii) Please explain why there are widely varying scan times for the fourth row observation.
- (e) Please confirm that, although there are three apparent editor initials on rows three and four of this sheet, the editor did not make all the edits that you now consider appropriate.

ADVO/USPS-T13-145. Please refer to your responses to UPS/USPS-T13-7 and  
ADVO/USPS-T13-76. The tally in the UPS question is:

CY50	8735	Vehicle	12:26	Dismount	Business Inside	Parcel	Drop to Customer
------	------	---------	-------	----------	--------------------	--------	---------------------

In your response, you state that the:

"USPS form 3999X (the 2<sup>nd</sup> attached page) shows the carrier dismounting to service 11 delivery points starting at 12:23 p.m. and ending at 12:30 p.m. These two documents [including the 1<sup>st</sup> attached page] show that the carrier was not in the vehicle at 12:26 as the tally shows."

However, the form 3999X shows 14 possible delivery points recorded by the USPS on that sector-segment, and they are all identified as Residential Type 2 deliveries. You state in response to ADVO/USPS-T13-82 that Type 2 are residential curblines deliveries. Please confirm the following or explain why you cannot.

- (a) The routine delivery type on that sector-segment is residential curblines, a delivery type which does not routinely require a dismount.
- (b) 12:23 PM is approximately the time the carrier began to service the curblines delivery points on that sector segment of the route being observed.
- (c) 12:30 PM is approximately the time the carrier began to service the delivery point in the subsequent sector segment of the route being observed (also a residential curblines delivery) and does not necessarily represent the time that the carrier completed delivery to the preceding sector segment on the route.
- (d) There appears to be a non-routine dismount during the sector-segment that begins 12:23 PM, and that non-routine dismount appears to be the sixth of 14 possible delivery points recorded by the USPS on that sector segment. The rest of the stops are curblines.
- (e) There is no way from the Form 3999X to determine whether the carrier was in his vehicle, at his vehicle, out of his vehicle walking to the point of delivery, or at a delivery point at either 12:20 PM or 12:26 PM.

ADVO/USPS-T13-146. Please refer to the Form 3999X provided in response to ADVO/USPS-T13-76.

- (a) What do the handwritten 1.5 and 2 figures mean?
- (b) What does the handwritten "END 1767" mean?

ADVO/USPS-T13-147. Advo interrogatory ADVO/USPS-T13-86 asked questions about the flowchart presented in Appendix A to your testimony. In your response, you state: "It was not the intent of this flow process chart to identify the work sampling codes, but to define the boundaries of the time study groupings." Yet in responses to

other Advo interrogatories (e.g., ADVO/USPS-T13-93(b)), you claim that “the time studies have nothing to do with the work sampling that is the subject of my testimony.” In light of these responses, please explain the relevance to your testimony of the Appendix A flow chart, and why it was included in your testimony.

ADVO/USPS-T13-148. Please provide the “USPS work methods videos” referred to in your response to ADVO/USPS-T13-85(b).