

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO OCA INTERROGATORIES  
(OCA/USPS-T13-10-11)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T13-10-11, filed on March 23, 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

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Washington, D.C. 20260-1137  
April 24, 2000

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES**

**OCA/USPS-T13-10. Regarding your use of direct observation and a barcode scanning system to collect data on carrier activities:**

- (a) Why did you employ this approach? Please explain your answer fully.**
- (b) Did you consider using alternative methods of collecting the data? If yes, please describe these methods and state why you ultimately employed the method you did. If no, why not?**
- (c) Did you consider having carriers self-report their activities through a paging or other communications system? Why or why not?**

**RESPONSE:**

**(a)-(c): Please see my responses to NAA/USPS-T13-3-6.**

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES**

OCA/USPS-T13-11. Given your experience developing and applying work-measurement systems, would you consider the data collection methods and technology employed in the ES study to be "state-of-the-art" for purposes of developing engineered methods and time standards for workload managing systems? Please explain your answer fully.

**RESPONSE:**

Yes. Please see my responses to NAA/USPS-T13-3-6.

## 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: 4-24-00

**CERTIFICATE OF SERVICE**

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

  
Richard T. Cooper

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