

Before The  
POSTAL RATE COMMISSION  
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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 ADVO INTERROGATORIES  
(ADVO/USPS-T13-24-37, 39-50, 52-59)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-24-37, 39-50, 52-59, filed on March 15, 2000. Mr. Raymond is still in the process of preparing answers to interrogatories 38 and 51 from this set.

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 28, 2000

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TO ADVO INTERROGATORIES

ADVO/USPS-T13-24. In response to ADVO/USPS-T12-3, witness Baron states that he discussed with you:

*“the need to define load time as time that begins after the carrier has completed accessing a delivery stop, and to define the activity of walking to or driving up to a delivery stopping point as something other than load time.”*

Please confirm that this discussion took place after the survey data in your study had been collected.

RESPONSE:

I confirm that this conversation took place after the data in the study had been collected.

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ADVO/USPS-T13-25. You have stated that no written instructions or training manuals were provided to the data collectors. Please provide the following documents with respect to any oral training or instructions given to data collectors on how to identify, categorize, and record the specific carrier activities they observed:

(a) Copies of all instructional presentation materials (including but not limited to outlines, overhead slides, videos, charts, definitions or descriptions of carrier activities, schematic tables, etc.) used in training or instructing the data collectors.

(b) Copies of all instructional scripts, outlines, notes, etc. provided to and/or used by the instructors in making their instructional presentations to data collectors.

If no such documents ever existed, please so state. If there were such documents but they are no longer available, explain why this documentation was not maintained.

RESPONSE:

(a-b) Attached to this response is a copy of the initial orientation agenda for the Phase 1 team that continued developing the approach and performed the Phase 1 data collection. Three video tapes were used: Street Management Presentation, Carrier Work Methods, and DPS Work Methods. I have provided these tapes to counsel, and, assuming that there is no reason to object to their production, I expect them to be produced shortly as library references. The Flow charts, Forms, Pictures referred to on line 6 of the agenda are materials previously produced as Library Reference USPS LR-I-220. The Work Plan mentioned on line 14 can be found in Library Reference USPS LR-I-252. The book referred to following line 5 is produced in LR-I- 220, the Plan refers to the Delivery Methodology Study – Work Plan Overview located in of Library Reference USPS LR-I- 252, and "LECRES" refers to a Postal Service arbitration decision.

## RESPONSE OF POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES

I have not been able to locate the agenda used for the initial six collectors in Phase 2 training. The first group of six data collectors were paired with three data collectors from Phase 1. The basic agenda, as in Phase 1, would have been adjusted in Lines 6, 7, 13, 18 along with the following additions: they would have each had their own book of bar codes, the three videos mentioned above would have been shown along with three additional tapes that had been made from video shot during Phase 1. I recently located these tapes and they have been presented to the Postal Service for review, and, if no objections exist, for production as library references. On the job training (OJT) was done regarding the use of the scanners, use of notebook computers for downloading and uploading the scanners, and how to generate and review the various reports generated after collecting data. Having had experience teaching other clients this method of data collection, I have found that talking through "what ifs" slows down and complicates the learning process. Therefore, in Phase 2, the emphasis was placed on OJT with out-in-the-field practice, practice, practice, and hands-on use of the equipment, generation of the reports, and review of the reports with making markups for edits.

A second group of Phase 2 collectors were paired with the initial nine in a more formal setting. Tables were set up with equipment: notebook computer, laser printer, TimeWand II scanners with docking stations and books of bar codes, scales for weighing satchels, thermometer/humidity measurement devices, tape measures, books of forms-pictures-flow process charts, and video cameras with blank tapes. I have just been able to locate the agenda for these training sessions, and have appended it to this response (entitled "Data Collection Training".) I also recently located overhead slides of

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the bar code sheets used during this training. These slides were used during the Question and Answer (Q&A) sessions. These slides are the same as the bar code sheets previously provided in LR-I-221.

The format for these sessions followed the approach used in training the first six new collectors in Phase 2. The Postal Expert covered the videos, the book of forms-pictures-flow process charts as he had done previously. He also discussed guidelines for conduct. Notes for these discussions along with expanded flow charts are also appended to this answer. I covered the communications guidelines entitled "The Party Line." These guidelines are attached to this response following the Phase 1 agenda. An overhead panel was used to project the software used for downloading and uploading the scanners, and an overhead projector was used for the bar code sheets/ overheads used during Q&A sessions. Emphasis was placed on OJT with out-in-the-field practice, practice, practice, and on-hands use of the equipment, generation of the reports, and review of the reports with making markups for edits. I am not aware of the nine OJT instructors from Phase 2, or the Postal Subject Matter Expert, or myself having any other notes or materials other than those all ready stated.

# RESPONSE OF POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES

**Meeting called by:** P. Johnson and L. Raymond

**Type of meeting:** Orientation

**Attendees:** Task Order Team, D. Harris, S. Jones, R. Bamford

**Please read:** Orientation Package

**Please bring:** Orientation Package

## ---- Agenda Topics ----

1. Outline present operating philosophy - @ Hotel	P. Johnson	M-8/26	10:00 -10:15 AM
2. Party line and protocol - @ Hotel	P. Johnson	M-8/26	10:15 -10:30 AM
3. Orientation Week Schedule - @ Hotel	L. Raymond	M-8/26	10:30 -10:40 AM
Travel to the Dewy Building			10:45 -1100 AM
4. Team Introductions	L. Raymond	M-8/26	11:00 -11:10 AM
5. Orientation Package Review	L. Raymond	M-8/26	11:10 -12:00 PM
Lunch			12:00 - 1:00 PM
6. Flow chart, Forms, Pictures – Overview	S. Jones	M-8/26	1:00 - 3:00 PM
Break			3:00 - 3:15 PM
7. Site visits (Inside and Outside) - Do's & Don'ts	SJ, DH, LR	M-8/26	3:15 - 5:00 PM
8. ATK, EDS, HBMCo. Discussion	DR, PJ, LR	M-8/26	5:00 - 6:00 PM
9. Site visits (Inside and Outside)		T-8/27	7:00 - 4:00 PM
10. Q & A	L. Raymond	T-8/27	4:00 - 4:30 PM
11. IE methodologies	L. Raymond	T-8/27	4:30 - 4:45 PM
12. Team structure and organization	L. Raymond	T-8/27	4:45 - 5:00 PM
13. Party line and protocol	L. Raymond	W-8/28	7:00 - 7:15 AM
14. Work Plan	L. Raymond	W-8/28	7:15 - 7:30 AM
15. Orientation Package	L. Raymond	W-8/28	7:30 - 8:00 AM
16. Flow chart and pictures	S. Jones	W-8/28	8:00 - 12:00 AM
17. Q & A	L. Raymond	W-8/28	1:00 - 2:00 PM
18. IE methodologies	L. Raymond	W-8/28	2:00 - 4:00 PM
19. Site visits (Inside and Outside)	TEAM	T-8/29	7:00 - 3:00 PM
20. Q & A	TEAM	T-8/29	3:00 - 4:00 PM
21. IE methodologies	L. Raymond	F-8/30	7:00 - 9:00 AM

# **RESPONSE OF POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES**

22. Work Plan	L. Raymond	F-8/30	9:00 - 10:00 AM
23. Orientation Package	L. Raymond	F-8/30	10:00 - 11:00 AM
24. Flow chart and pictures	L. Raymond	F-8/30	11:00 - 11:30 AM
25. Q & A	L. Raymond	F-8/30	11:30 - 12:30 PM

## **---- Other Information ----**

Charlie Baker from LR will drop in during the week to address the Team.  
Dick Strasser (District Manager - Northern Virginia District), Curtis Weed (Manager, Post Office Operations - Northern Virginia District) and Mike Furey (Manager Operations Programs Support - Northern Virginia District) will be at the EX Site Kickoff meeting Tu. @ 7:00 AM.

1. Outline present operating philosophy	P. Johnson	10:00 -10:15 AM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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2. Party line and protocol	P. Johnson	10:15-10:30 AM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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3. Orientation Week Schedule	L. Raymond	10:30-10:40 AM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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4. Team Introductions	L. Raymond	11:00 - 11:10 AM
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Discussion:	Organization Chart
Conclusion:	

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
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<b>Action Items:</b>	<b>Person Responsible:</b>	<b>Deadline:</b>
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<b>5. Orientation Package Review</b>	<b>L. Raymond</b>	<b>11:10 - 12:00 PM</b>
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<b>Discussion:</b>	<b>Book, Plan, LCRES Case</b>
<b>Conclusion:</b>	

<b>Action Items:</b>	<b>Person Responsible:</b>	<b>Deadline:</b>
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<b>6. Flow chart, Forms, Pictures - Overview</b>	<b>S. Jones</b>	<b>1:00 - 3:00 PM</b>
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<b>Discussion:</b>	
<b>Conclusion:</b>	

<b>Action Items:</b>	<b>Person Responsible:</b>	<b>Deadline:</b>
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<b>7. Site visits (Inside and Outside) - Do's &amp; Don'ts</b>	<b>S. J. , D.H., L.R.</b>	<b>3:15 - 5:00 PM</b>
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<b>Discussion:</b>	<b>No - paper, pens, pads!, Only ask Simmie, Bob, Dick, Lloyd questions! Don't open doors, don't lose site of your subject. Be safe - watch traffic, public interaction is a be nice but be silent. Watch where you park. ETC.</b>
<b>Conclusion:</b>	

<b>Action Items:</b>	<b>Person Responsible:</b>	<b>Deadline:</b>
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<b>8. ATK, EDS, HBMCo. Discussion</b>	<b>D.R., P.J., L.R.</b>	<b>5:00 - 6:00 PM</b>
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<b>Discussion:</b>	<b>PD, Travel, Work Hours, Etc., Dress Code, Team Interaction</b>
<b>Conclusion:</b>	

<b>Action Items:</b>	<b>Person Responsible:</b>	<b>Deadline:</b>
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<b>9. Site visits (Inside and Outside)</b>	<b>L. Raymond</b>	<b>6:30AM -4:00 PM</b>
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<b>Discussion:</b>	<b>Assemble at hotel lobby @ 6:30 AM, @ Site 7:00 AM - 3:30 PM then back to the Dewy Bldg. 4:00 - 5:00 PM</b>
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# RESPONSE OF POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES

Conclusion:	
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Action Items:	Person Responsible:	Deadline:

10. Q & A	L. Raymond	4:00 - 4:30 PM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

11. IE methodologies - Overview	L. Raymond	4:30 - 4:45 PM
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Discussion:	Flow Chart, Video, Simulation, AutoMOST, Bar Code, MOST Systems
Conclusion:	

Action Items:	Person Responsible:	Deadline:

12. Team structure and organization	L. Raymond	4:45 - 5:00 PM
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Discussion:	Inside - Outside and Methods/Standards/Validation
Conclusion:	

Action Items:	Person Responsible:	Deadline:

13. Party line and protocol	L. Raymond	7:00 - 7:15 AM
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Discussion:	Why, What ifs!!!!
Conclusion:	

Action Items:	Person Responsible:	Deadline:

14. Work Plan	L. Raymond	7:15 - 7:30 AM
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# **RESPONSE OF POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES**

Discussion:	Weekly Schedule
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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15. Orientation Package	L. Raymond	7:30 - 8:00 AM
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Discussion:	Q & A,
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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16. Flow chart, Forms, Pictures - Details	S. Jones	8:00 - 12:00 PM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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17. Q & A	L. Raymond	1:00 - 2:00 PM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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18. IE methodologies	L. Raymond	2:00 - 4:00 PM
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Discussion:	Detail - Show and Tell
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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19. Site visits (Inside and Outside)	TEAM	7:00 - 3:00 PM
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# RESPONSE OF POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES

Discussion:	No paper, pens, pads, watches, -Observe only!!!!!!
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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20. Q & A @ the Dewy Building	TEAM	3:00 - 4:00 PM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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21. IE methodologies	L. Raymond	7:00 - 9:00 AM
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Discussion:	More details on approaches to be used - Show and Tell
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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22. Work Plan	L. Raymond	9:00 - 10:00 AM
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Discussion:	Review Milestones
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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23. Orientation Package	L. Raymond	10:00 - 11:00 AM
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Discussion:	Discuss Case
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

24. Flow chart, Forms, Pictures	L. Raymond	11:00 - 11:30 AM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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25. Q & A	L. Raymond	11:30 - 12:30 PM
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Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
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**---- Other Information ----**

Issues and Answers technique. Put in place Project Scope tracking, T&E tracking, Vacations, Holidays, Phone #'s, Equipment list and responsibility.

# Data Collection Training

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## Week 1

### Monday

Welcome and Introduction  
Contracts, Expenses and Confidentiality Agreements  
Overview (Where, Why, Who, When)

#### Break

Conduct of Data Collector  
Films -- Best Methods ,Bad Methods and Union Interactions

#### Break

Counts -- Inside Review  
Counts -- Outside Review

#### Lunch

Video Camera Usage  
Video Focus Studies Review  
Video Practice Session

#### Break

Review Check List and Ergonomic Data

#### Break

Question and Answer Period

### Tuesday

Field Work  
Up Load Data to Computer  
Review Counts (Inside and Outside)  
Review Checklist Data and Input  
Review Ergonomic Data and Input

### Wednesday

Overview -- Bar Code Structure

#### Break

Review Computer Systems  
Generate Reports  
Application Practice  
Variance Analysis

#### Lunch

Practice Timing and Scanning with Video  
Role playing situations

#### Break

Computer Download/Upload and Communications

### Thursday

Field Work  
Up Load Data to Computer  
Enter Data  
Print reports

### Friday

Expense Reporting and Invoicing  
Week in Review

# **Data Collection Training**

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## **Week 2**

### **Monday**

Field Work  
Up Load Data  
Generate Reports  
Edit Data

### **Tuesday**

Question and Answer Period on Field Work  
Generate Reports  
Review Data  
Edit Data  
Review Validation  
Input Checklist Data  
Input Ergonomic Data

### **Wednesday**

Field Work  
Up Load Data

### **Thursday**

Question and Answer Period on Field Work  
Generate Reports  
Review Data  
Edit Data  
Review Validation  
Input Checklist Data  
Input Ergonomic Data

### **Friday**

Expense Reporting and Invoicing  
Week in Review  
Question and Answer Period  
Overview of Previous Two Weeks

## CONDUCT

No eating or drinking on workroom floor

Stay with subject at all times

Comfort stop before going to route (refrain from too many drinks)

Don't walk beside subject (behind them)

Stay on sidewalks (don't cross lawns)

Don't suggest where to eat lunch

On curb route stay well behind carrier (at least 2 car lengths)

Never crowd your subject - office or street

No smoking in building or dock area

Never suggest to carrier to alter his style (this will work against you) refer to his supervisor

## **STREET**

At least one collector stays with subject from reporting to ending time

Do not get lost on return in P.M. One parks car, other remains with subject

Keep subject in sight at all times, even lunch

Carry snack items in case subject doesn't eat lunch or eats at home

Never become separated from co-worker

Watch traffic, on foot or motorized

Watch for dogs (carry spray but don't rely too much) use clipboard

Customer interaction - don't react



## **UNION INTERFERENCE**

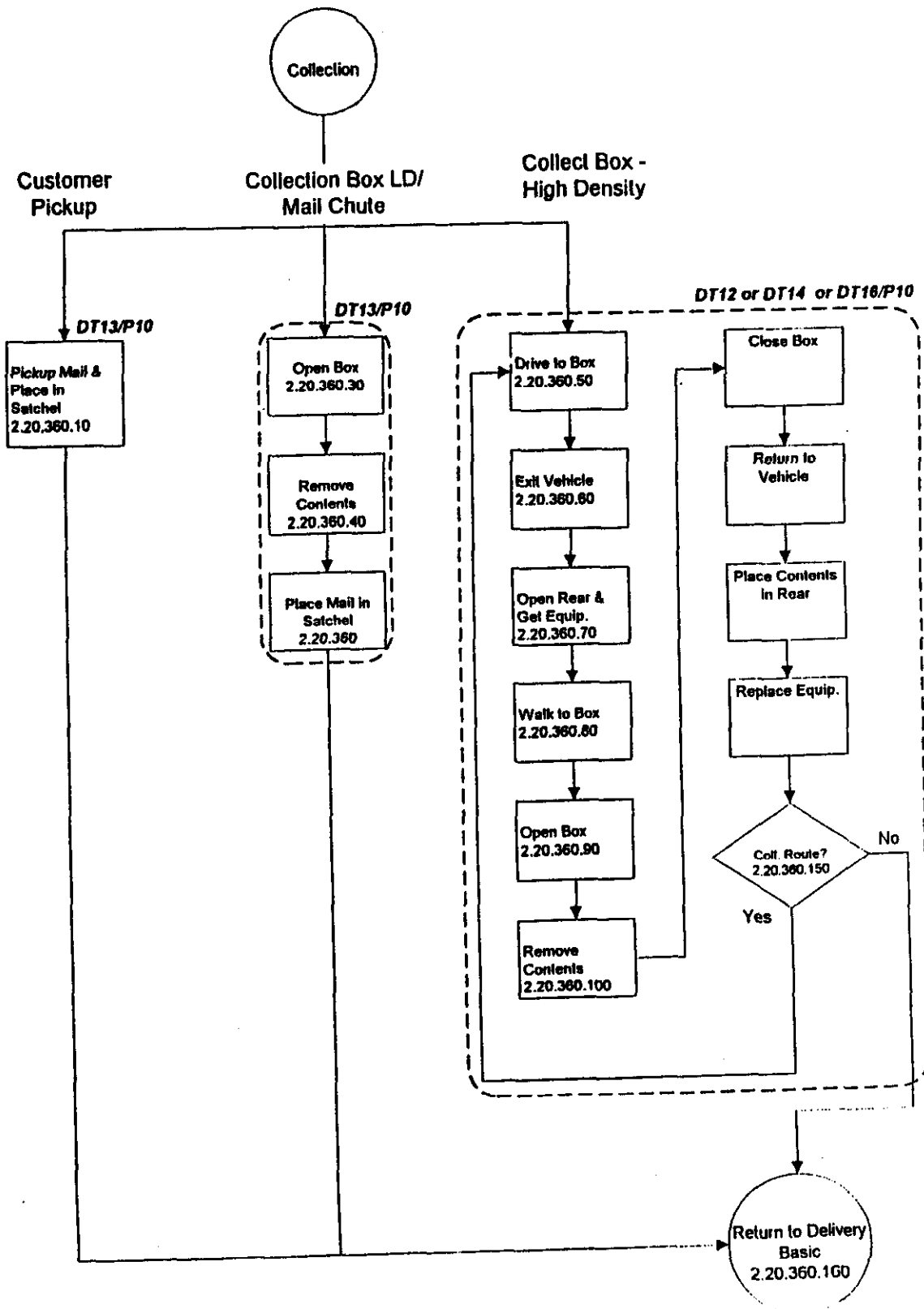
**- - Do not entertain their questions**

**Report all interactions with the union to you or the carrier**

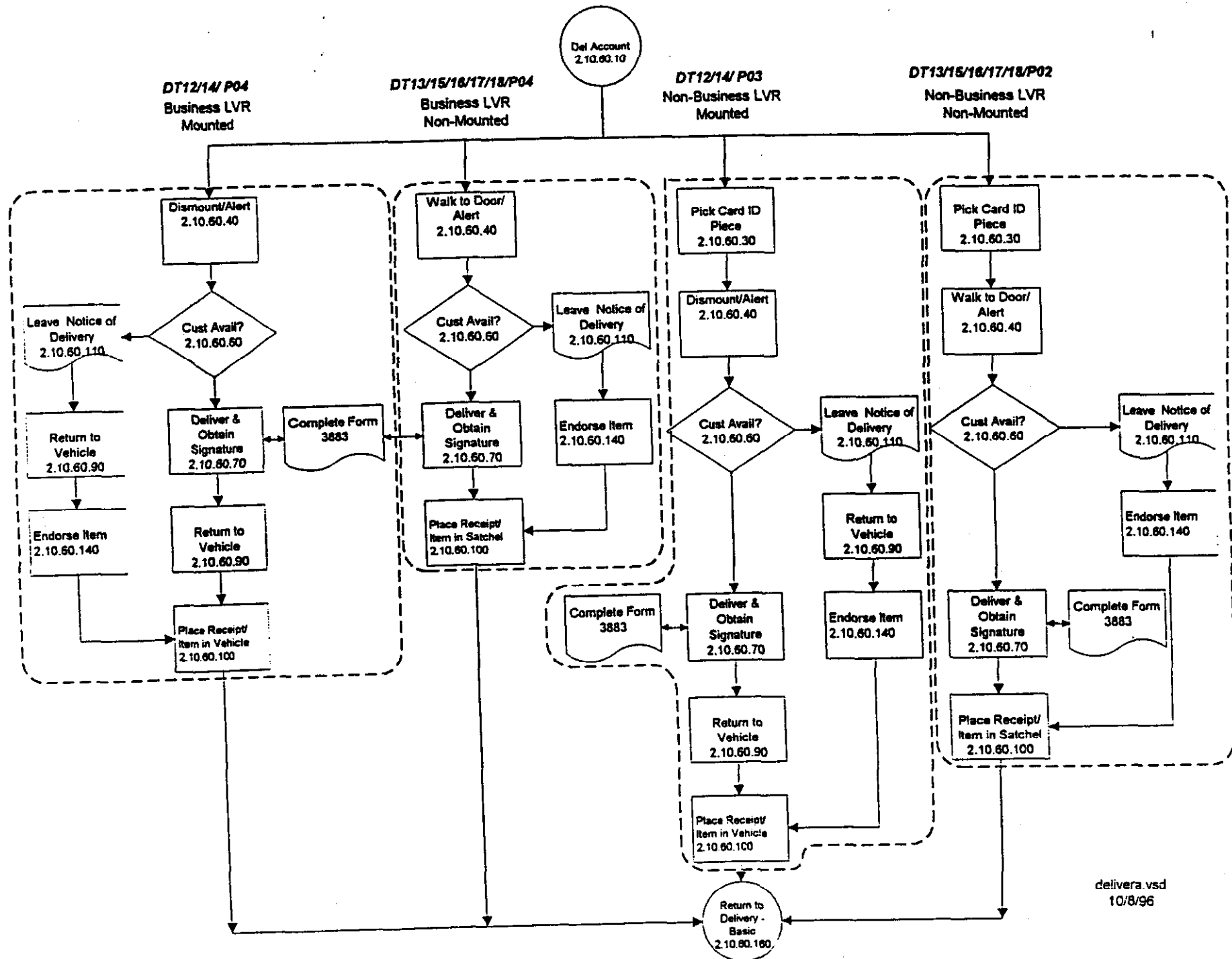
**Film all union interference's if possible**

**Try and get names or calling cards of union reps**

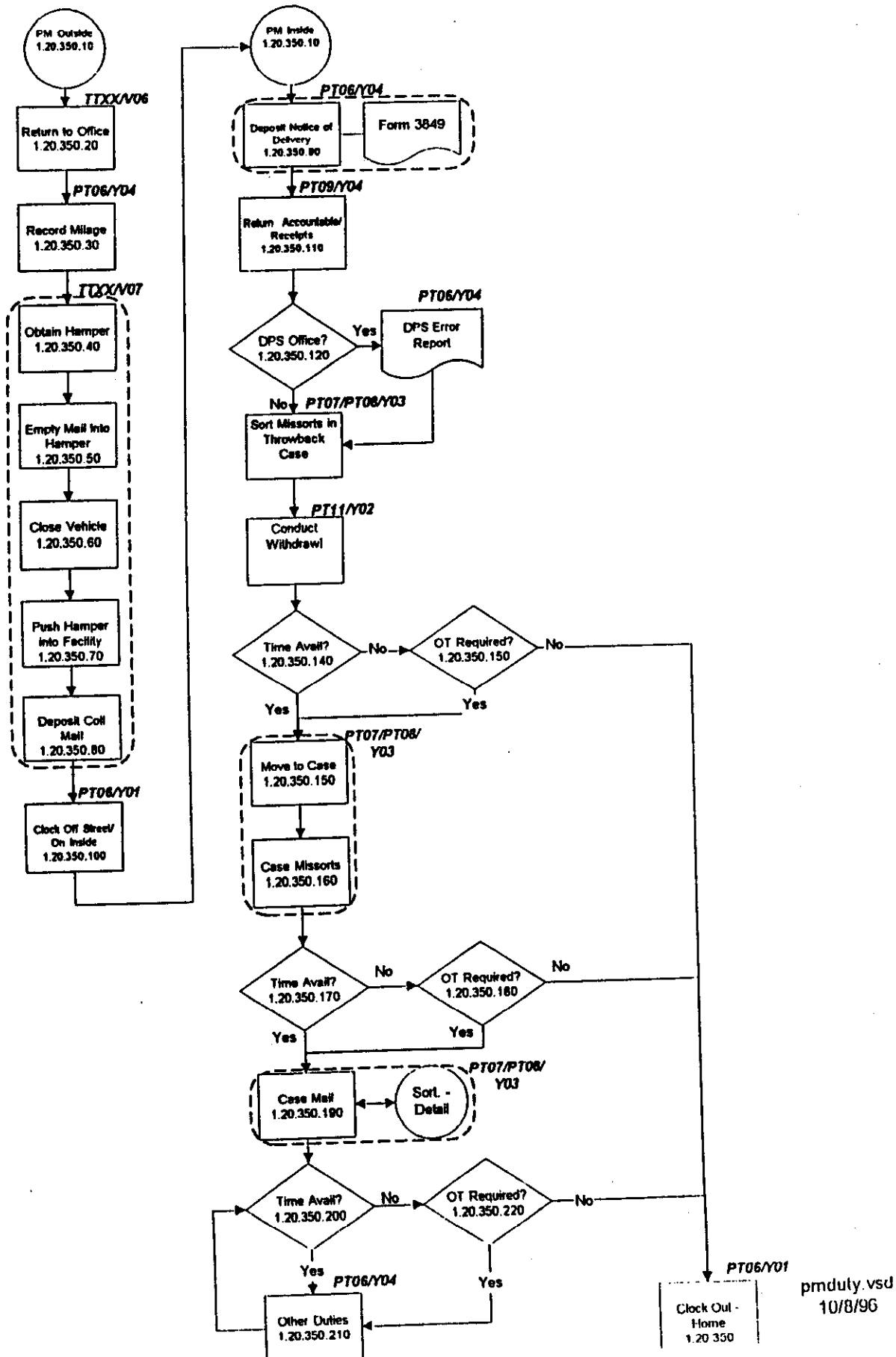
# Collection - Detail



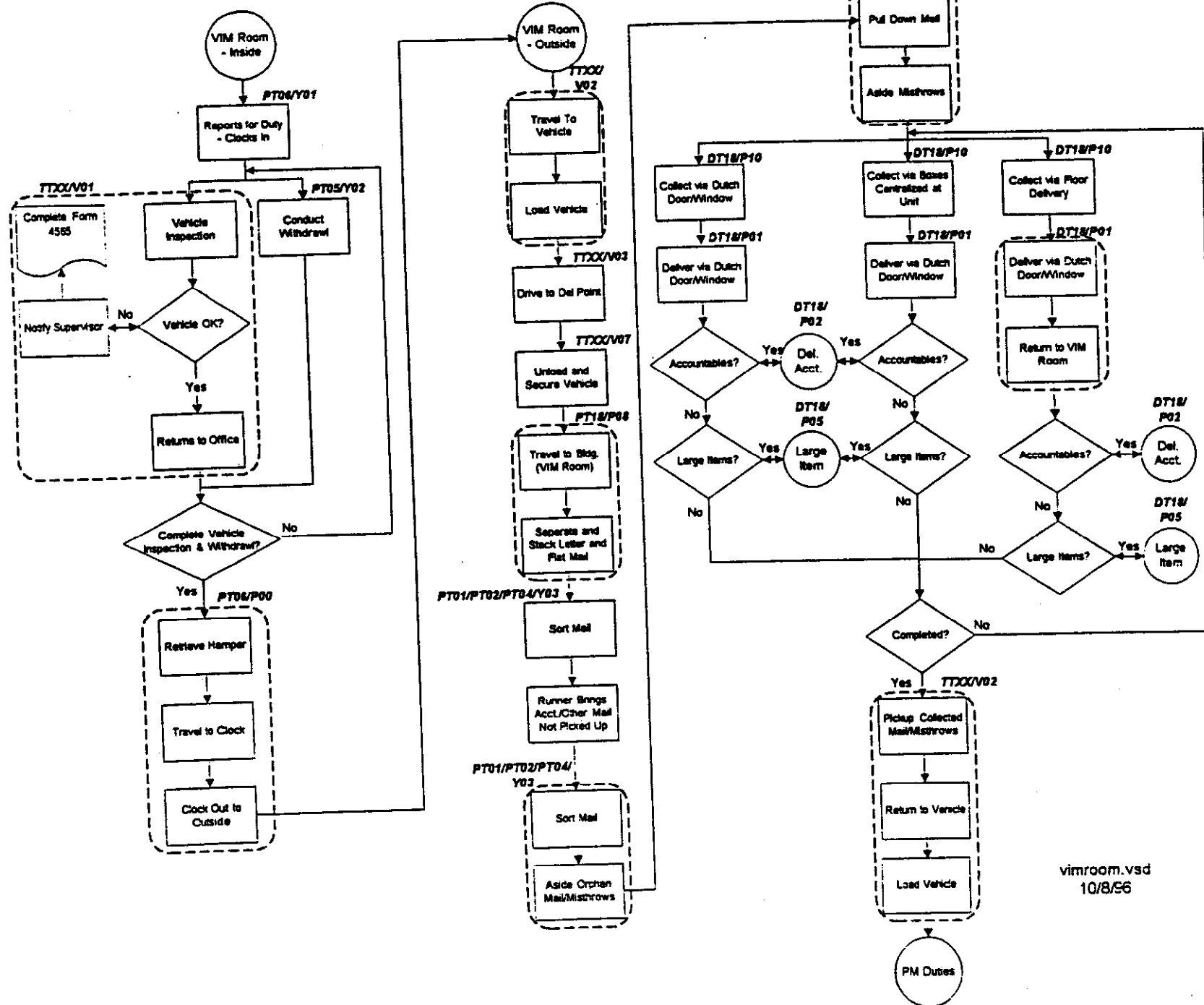
# Delivery Account - Detail



# PM Duties



# Vertical Improved Mail (VIM, Room - Detail)



vimroom.vsd  
10/8/96

**THE PARTY LINE**  
**"if you're not sure don't say it"**

**What are you doing?**

A methods review/study/analysis of the activities of the City Letter Carriers.

**Why are you doing it?**

As part of "Customer Perfect!" and "Delivery Perfect!", we are looking at ways we can improve the operation of letter carriers. To do this, we need to understand what it is that a letter carrier does.

**What will you be looking at?**

A look at all the activities you perform, how you do them, how often you do them, what things are easy, what things are hard, any interruptions, problem issues, etc.

**Who is asking you to do this?**

William Henderson , the Chief Operating Officer of the USPS, is the sponsor of the project.

**Who do you work for?**

Dick Harris, from the Engineering group, is the USPS manager responsible for the project.

**Do you work for the USPS?**

Yes, (if you do) or,  
No, we are independent contractors.

**Would you actually like to try doing this work?**

No, we might find that we were in contravention of your union agreement if we did that.

**What will be the outcome of this work?**

As I understand it, this is just a study. I do not know what it will be used for or if it will be used.

**Why did you choose me?**

We have to monitor a certain amount of each type of route and yours was chosen at random by that type of route.

**Are you going to do time studies?**

We will be using a variety of techniques to determine how long various methods take including: time study, flow charting, work sampling, simulations, ergonomic assessment.

**Will you be setting time/work standards?**

As part of our methods analysis, it will be necessary to assess the difference between two methods. One of the ways we do this is by standards. We also look at safety and ergonomic factors.

**Will you be setting up some sort of work assessment system?  
performance measurement system?  
(other)?**

Our task is only to do this study.

**What does the union think of this?**

The union has been advised that we are doing this work. You should take this question up with your steward.

**Will this result in anyone losing their job?**

I understand that this is just a study.

**Would you be interested in ideas I have about doing the job differently?**

Yes, providing that doesn't interfere with you doing your work.

**Should I do things differently while you are with me?**

No, I would appreciate it if you would stay with the method that you normally use, but I would be interested to hear what your suggestions are provided that does not interfere with you doing your work.

**Do you think it's reasonable to \_\_\_\_\_ ?**

I don't know. I have not been asked to look at that. Perhaps, it is something to take up with your shop steward.

If other questions arise, or if persistence for another/further answer occurs, advise employee to ask his/her supervisor or Dick Harris.....Also let subject matter expert know.

All written communication should be taken with the person to the supervisor.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
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**ADVO/USPS-T13-26.** In your response to MPA/USPS-T13-15, you state that "any additional Phase 2 contractors" over and above the 24 initially trained were placed with the two person teams and received on the job instruction and instruction from the Postal Service Subject Matter Expert." Please provide:

- (a) The number of days a new data collector spent doing on-the-job training.
- (b) For each additional data collector, the code of the data collector(s) that trained him or her.
- (c) Any supporting evidence that such training took place.

**RESPONSE:**

After a very time-consuming seven days of dedicated effort to review the expense sheets, comments logs, and 3999Xs, we were able to gather the information to support the following responses.

- (a) No formal training sessions took place for new data collectors over and above the 24 initially trained. The on the job instruction typically equated to approximately six to 10 work days.

- (b) Each data collector who received on the job instruction is listed in the following table.

<b>InTraining</b>	<b>ATrainer</b>	<b>bTrainer</b>	<b>aQC</b>	<b>bQC</b>
OBS10	OBS46			
OBS10	OBS43	OBS38		
OBS10	OBS38			
OBS10	OBS25			
OBS10	OBS46	OBS25		
OBS10	OBS46	OBS25		
OBS10	OBS46	OBS25		
OBS10	OBS57			
OBS10	OBS61			
OBS10	OBS61			



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OBS10	OBS61			
OBS10	OBS61			
OBS28	OBS15	OBS14		
OBS28	OBS31	OBS18		
OBS28	OBS18	OBS31		
OBS28	OBS31	OBS18		
OBS28	OBS14	OBS15		
OBS28	OBS45			
OBS28	OBS45			
OBS28	OBS45			
OBS28	OBS45			
OBS28	OBS37		OBS12	
OBS28	OBS37		OBS12	
OBS29	OBS31	OBS18	OBS12	
OBS29	OBS18	OBS31	OBS12	
OBS29	OBS31	OBS18	OBS12	
OBS29	OBS14	OBS15	OBS08	
OBS29	OBS18	OBS14		
OBS29	OBS18	OBS31		
OBS29	OBS31	OBS18		
OBS29	OBS14	OBS15		
OBS29	OBS38	OBS16		
OBS29	OBS38			
OBS29	OBS38			
OBS30	OBS31	OBS18	OBS12	
OBS30	OBS18	OBS31	OBS12	
OBS30	OBS31	OBS18	OBS12	
OBS30	OBS14	OBS15	OBS08	
OBS30	OBS18	OBS14		
OBS30	OBS38	OBS43		
OBS30	OBS43	OBS38		
OBS30	OBS43	OBS38		
OBS30	OBS43	OBS43		
OBS30	OBS43	OBS43		
OBS42	OBS31	OBS18	OBS12	
OBS42	OBS14	OBS15		
OBS42	OBS26	OBS17		
OBS42	OBS26	OBS17		
OBS42	OBS26			
OBS42	OBS26			
OBS42	OBS26			
OBS43	OBS18	OBS31		
OBS43	OBS31	OBS18		

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OBS43	OBS18	OBS31		
OBS43	OBS15	OBS14		
OBS43	OBS33	OBS16		
OBS43	OBS33	OBS16		
OBS43	OBS38	OBS24		
OBS43	OBS38	OBS24		
OBS43	OBS24	OBS38		
OBS43	OBS38		OBS13	
OBS43	OBS38		OBS13	
OBS43	OBS38			
OBS45	OBS18	OBS31		
OBS45	OBS15	OBS14		
OBS45	OBS14	OBS15		
OBS45	OBS14	OBS15		
OBS45	OBS40	OBS09		
OBS45	OBS40	OBS09		
OBS45	OBS09	OBS40		
OBS45	OBS25			
OBS45	OBS25			
OBS45	OBS25			
OBS46	OBS14	OBS31	OBS12	
OBS46	OBS31	OBS18	OBS12	
OBS46	OBS18	OBS31	OBS12	
OBS46	OBS14	OBS15		
OBS46	OBS20			
OBS46	OBS20			
OBS46	OBS39			
OBS46	OBS39			
OBS46	OBS39			
OBS47	OBS14	OBS31	OBS12	
OBS47	OBS31	OBS18	OBS12	
OBS47	OBS18	OBS31	OBS12	
OBS47	OBS14	OBS15		
OBS47	OBS14	OBS15		
OBS47	OBS43	OBS38	OBS13	
OBS47	OBS43	OBS38	OBS13	
OBS47	OBS16			
OBS47	OBS16			
OBS47	OBS16			
OBS48	OBS18	OBS31		
OBS48	OBS15	OBS14		
OBS48	OBS14	OBS15		
OBS48	OBS14	OBS15		

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
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OBS48	OBS16			
OBS48	OBS16			
OBS48	OBS16			
OBS48	OBS47	OBS16	OBS13	
OBS48	OBS16	OBS47	OBS13	
OBS48	OBS47	OBS16	OBS13	
OBS49	OBS31	OBS18		
OBS49	OBS15	OBS14		
OBS49	OBS14	OBS15		
OBS49	OBS32			
OBS49	OBS32			
OBS49	OBS32			
OBS49	OBS32			
OBS49	OBS32			
OBS49	OBS32			
OBS50	OBS31	OBS18		
OBS50	OBS15	OBS14		
OBS50	OBS14	OBS15		
OBS50	OBS09	OBS40		
OBS50	OBS40	OBS09		
OBS50	OBS09	OBS40		
OBS50	OBS25			
OBS50	OBS25			
OBS50	OBS25			
OBS53	OBS31	OBS18	OBS12	
OBS53	OBS18	OBS31		
OBS53	OBS31	OBS18	OBS12	OBS08
OBS53	OBS14	OBS15		
OBS53	OBS15	OBS14		
OBS53	OBS14	OBS15		
OBS53	OBS17		OBS13	
OBS53	OBS17			
OBS53	OBS32			
OBS53	OBS32			
OBS54	OBS31	OBS18		
OBS54	OBS18	OBS31		
OBS54	OBS18	OBS31		
OBS54	OBS15	OBS14		
OBS54	OBS15	OBS14		
OBS54	OBS15	OBS14		
OBS54	OBS45	OBS25		
OBS54	OBS29	OBS48		
OBS54	OBS48	OBS29		

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TO ADVO INTERROGATORIES

OBS54	OBS17			
OBS54	OBS17			
OBS54	OBS17			
OBS55	OBS45	OBS25		
OBS55	OBS45	OBS25		
OBS55	OBS29	OBS48		
OBS55	OBS48	OBS29		
OBS55	OBS25	OBS45		
OBS55	OBS45			
OBS55	OBS29			
OBS55	OBS25			
OBS55	OBS29		OBS08	
OBS55	OBS48			
OBS56	OBS53	OBS39	OBS12	
OBS56	OBS39	OBS53		
OBS56	OBS30	OBS55		
OBS56	OBS30	OBS40		
OBS56	OBS30	OBS40		
OBS56	OBS40	OBS30		
OBS57	OBS38	OBS43		
OBS57	OBS38			
OBS57	OBS38			
OBS57	OBS38			
OBS57	OBS25		OBS13	
OBS57	OBS38			
OBS58	OBS50	OBS38	OBS13	
OBS58	OBS38	OBS50	OBS13	
OBS58	OBS38			
OBS58	OBS46	OBS16		
OBS58	OBS13	OBS16		
OBS58	OBS38	OBS60		
OBS58	OBS16	OBS60		
OBS58	OBS32	OBS60		
OBS58	OBS46			
OBS58	OBS16			
OBS59	OBS55	OBS53		
OBS59	OBS55	OBS53		
OBS59	OBS56		OBS12	
OBS59	OBS56		OBS12	
OBS59	OBS56		OBS12	
OBS59	OBS39			
OBS59	OBS56	OBS40		
OBS60	OBS13			

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OBS60	OBS43		OBS13	
OBS60	OBS43	OBS50	OBS13	
OBS60	OBS50			
OBS60	OBS50			
OBS61	OBS13	OBS14		
OBS61	OBS14	OBS16		
OBS61	OBS48	OBS14	OBS13	
OBS61	OBS25		OBS13	
OBS61	OBS25			
OBS61	OBS25			
OBS61	OBS58	OBS16		

(c) The 94 binders of field edited/corrected data that were presented at the second technical conference may include annotations indicating the involvement of a third or fourth data collector. The presence of a third or fourth data collector would suggest that initial on the job instruction was taking place. No summary document reflecting a data collector's instruction exists, however, the USPS Subject Matter Expert used the materials identified in ADVO/USPS-T13-25 as part of his educational process with each new collector.

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ADVO/USPS-T13-27. Please refer to your response to MPA/USPS-T13-16, listing data observers and the routes they worked on. In the summary on pages 1-2, you list three Phase 2 data collectors (coded OBS27, OBS 51, and OBS52) for which no routes are shown in the route-assignment detail on pages 6-15. Conversely, you list three data collectors in the detail section (coded OBS59-OBS61) that are not listed in the summary. Please explain these discrepancies, and provide any missing data and/or corrections to your response.

**RESPONSE:**

The three Phase 2 data collectors (coded OBS27, OBS51, and OBS52) were assigned to other aspects of the ES study. Due to a technical glitch, it appears that the first of two tables provided in the response to MPA 16 was incomplete. A complete list is provided below. The data observers OBS59, OBS60, and OBS61 are on the complete list. Note that on the complete list, data observer codes were assigned (OBS62, OBS63, OBS64, OBS65, and OBS66), but these observers were utilized on other aspects of the ES study.

Code	Phase 1	Phase2
OBS02	X	
OBS04	X	
OBS05	X	
OBS06	X	
OBS07	X	
OBS08	X	X
OBS09		X
OBS10		X
OBS12	X	X
OBS13	X	X
OBS14		X
OBS15		X
OBS16		X
OBS17		X
OBS18		X
OBS19		X
OBS20		X
OBS21		X

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OBS22		X
OBS23		X
OBS24		X
OBS25		X
OBS26		X
OBS27		X
OBS28		X
OBS29		X
OBS30		X
OBS31		X
OBS32		X
OBS33		X
OBS35		X
OBS36		X
OBS37		X
OBS38		X
OBS39		X
OBS40		X
OBS41		X
OBS42		X
OBS43		X
OBS45		X
OBS46		X
OBS47		X
OBS48		X
OBS49		X
OBS50		X
OBS51		X
OBS52		X
OBS53		X
OBS54		X
OBS55		X
OBS56		X
OBS57		X
OBS58		X
OBS59		X
OBS60		X
OBS61		X
OBS62		X
OBS63		X
OBS64		X
OBS65		X
OBS66		X

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**ADVO/USPS-T13-28. With respect to your response to MPA/USPS-T13-16:**

- (a) How many data collectors were employed at one time in Phase 1 (i.e., the standard complement of data collectors)?**
- (b) Please indicate the level of turnover of data collectors in Phase 1 (i.e., the number of data collectors who worked during any part of Phase 1 that left before the completion of Phase 1).**
- (c) Please identify the number of new data collectors who were brought in after the start of Phase 1 to fill vacancies.**
- (d) How many data collectors were employed at one time in Phase 2?**
- (e) Please indicate the level of turnover of data collectors in Phase 2.**
- (f) Please identify the number of new data collectors who were brought in after the start of Phase 2 to fill vacancies.**
- (g) Please provide any documents or information used in the recruitment or hiring of data collectors (e.g., recruitment ads, information sheets or job descriptions provided to prospective applicants, etc.) that describe the job and/or minimum applicant qualifications for the job.**

**RESPONSE:**

**(a-c) Phase 1 began with eight data collectors. There were four teams of two data collectors, one team at a fixed location and the remaining three teams roving. Two data collectors left the project very close to the end of Phase 1 and were not replaced. The remaining three teams were utilized to complete Phase 1.**

**(d-f) Phase 2 began with twenty-four (6+18) data collectors. Sixteen data collectors either left the project or accepted different responsibilities. A total of twenty-one additional data collectors received training, but sixteen were used for data collection.**



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(g) There were no documents, recruitment ads, information sheets or written job descriptions provided to prospective applicants that I developed or ever saw. All discussions relative to the positions were verbal.

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ADVO/USPS-T13-29. The code numbers for data collectors in your response to MPA/USPS-T13-16 go up to number 58 (in the summary section) and up to number 61 (in the detail section). However, in both the summary and detail sections, there are a total of only 52 actual data collectors listed.

(a) Please explain why there are gaps in the sequential coding of data collectors.

(b) Do any of the gaps in observer codes represent individuals who collected data for this or any other project. If so, explain fully.

**RESPONSE:**

(a) Observer codes were assigned to everyone, not just data collectors. The gaps represent contractors who were involved in other functions, not data collection.

(b) The individuals represented by the gaps in the observer codes did not collect Phase 1 and 2 data. These codes may have been used for other duties such as scanning in time study data extracted from the videotapes.

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**ADVO/USPS-T13-30. In your response to ADVO/USPS-T13-6, you state that "USPS Subject Matter Experts that were involved in the design of the data to be collected rotated between collection teams observing the collection process."**

**(a) Were any of these individuals employees of the United States Postal Service? If so, please indicate the number of such individuals, their job titles, positions, and work responsibilities within the USPS.**

**(b) If any of these individuals were not employees of the United States Postal Service, please indicate the entities these individuals were affiliated with, the number of such individuals by employer, and their job titles, positions, and work responsibilities.**

**(c) How many such individuals rotated between collection teams during "Phase 1? During Phase 2?**

**(d) Explain precisely how these individuals were "involved in the design of the data.**

**RESPONSE:**

**(a) Yes, two of the Subject Matter Experts were employees of the United States Postal Service and the third individual was a Postal Service retiree that had contracted back with the United States Postal Service. One employee was a Postmaster with the job function of operating a Post Office. The other employee title was a Program Manager Decision Support Systems with the job function of managing/doing projects. This individual was also the Contracting Officer's Representative (COR) and Technical Officer.**

**(b) The former United States Postal Service retiree was also a former Postmaster responsible for operating a Unit and an Operations Analyst responsible for conducting special analysis projects in the Southern Area. This individual was an independent**

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contractor for the United States Postal Service and later he transitioned to an independent contractor with A. T. Kearney, Inc..

(c) All three of these Subject Matter Experts rotated between teams in Phase 1. During Phase 2 only the COR rotated between the teams and the retiree reviewed data, reports, videos, and contributed in other ways to analysis, development of the methods and standards, and education of Phase 2 data collectors.

(d) These individuals were our escorts and technical advisors. As we developed the inventory of tasks they would review our information and advise us on any shortcomings. As we developed the bar code data collection methodology they would test us to see if we had gaps in the structure. As we ran trials on data collection they reviewed our reports to see if the information in those reports was readily understandable. They did not direct us, but participated as our peers in designing a comprehensive collection process.

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**ADVO/USPS-T13-31.** In your response to MPA/USPS-T13-16, you provided a list of the data collectors (by observer code number) and the routes (by route code number) that each data collector worked on during the Phase 1 and Phase 2 data collections.

(a) Please confirm that your list includes 618 observer/route entries, consisting of 177 entries for Phase 1 and 441 entries for Phase 2.

(b) Please confirm that among those entries are a number of duplicate entries, specifically for the following observer/route combinations: OBS06 on route 9302, OBS07 on route 3703, OBS07 on route 3705, OBS07 on route 4732, OBS07 on route 4811, OBS08 on route 1595, and OBSI 3 on route 5566.

(c) Please explain these duplicate entries. If they are duplicates, provide a corrected response to the interrogatory in hard copy and electronic spreadsheet format.

(d) Please confirm that, after elimination of these duplicate entries, your list includes a total of 611 observer/route entries, consisting of 170 entries for Phase 1 and 441 entries for Phase 2.

If you cannot confirm any of the above, please explain why and provide the numbers that you believe to be correct.

**RESPONSE:**

(a) Confirmed.

(b) Confirmed.

(c) The list of data collectors and routes was created from various queries of the database. These queries used for the creating the observer code and route code list utilized the date, which allowed the routes observed on multiple days to be included in the list. A revised list is provided following part (d) of this response, and will be provided as a library reference in electronic form.

(d) Confirmed. The Phase 1 data collectors (by observer code number) and routes (by route code) provided in the response to MPA/USPS-T13-16 does contain

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duplicates. This is the case with OBS06 on route 9302, OBS07 on route 3703,  
OBS07 on route 3705, OBS07 on route 4732, OBS07 on route 4811, and OBS08 on  
route 1595, and OBS13 on route 5566. A revised list is provided below.

**Phase 1 Observer and Routes**

<b>ObserverCode</b>	<b>RoutNumberCode</b>
OBS02	1908
OBS02	1928
OBS02	1970
OBS02	2822
OBS02	2835
OBS02	2947
OBS02	4846
OBS02	4876
OBS02	7519
OBS02	8035
OBS02	8045
OBS02	9303
OBS04	0610
OBS04	0626
OBS04	1560
OBS04	1569
OBS04	1595
OBS04	1612
OBS04	1842
OBS04	2912
OBS04	2947
OBS04	3507
OBS04	3522
OBS04	3543
OBS04	3549
OBS04	3618
OBS04	3656
OBS04	4114
OBS04	4126
OBS04	4214
OBS04	4219
OBS04	4242
OBS04	4310
OBS04	4445
OBS04	8044
OBS04	8229

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OBS05	3705
OBS06	1618
OBS06	1906
OBS06	1926
OBS06	2806
OBS06	2814
OBS06	2912
OBS06	2934
OBS06	3133
OBS06	3655
OBS06	4442
OBS06	4506
OBS06	4515
OBS06	4846
OBS06	4880
OBS06	5405
OBS06	5546
OBS06	8008
OBS06	8028
OBS06	8061
OBS06	9302
OBS07	0163
OBS07	0818
OBS07	0828
OBS07	0849
OBS07	0908
OBS07	1024
OBS07	1061
OBS07	1205
OBS07	1206
OBS07	1233
OBS07	1237
OBS07	1252
OBS07	1253
OBS07	1428
OBS07	1430
OBS07	1435
OBS07	1475
OBS07	1485
OBS07	1946
OBS07	2374
OBS07	2375
OBS07	2385
OBS07	3104
OBS07	3125
OBS07	3141

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OBS07	3703
OBS07	3704
OBS07	3705
OBS07	3707
OBS07	4708
OBS07	4712
OBS07	4719
OBS07	4725
OBS07	4726
OBS07	4731
OBS07	4732
OBS07	4811
OBS07	4814
OBS07	4817
OBS07	4910
OBS07	4918
OBS07	4921
OBS07	6703
OBS07	6739
OBS07	6742
OBS08	0628
OBS08	1558
OBS08	1560
OBS08	1569
OBS08	1595
OBS08	2934
OBS08	4104
OBS08	4106
OBS08	4111
OBS08	4114
OBS08	4214
OBS08	4219
OBS08	4223
OBS08	4227
OBS08	4242
OBS12	0211
OBS12	0222
OBS12	0310
OBS12	0321
OBS12	0326
OBS12	0429
OBS12	0603
OBS12	0607
OBS12	1620
OBS12	2155
OBS12	2161



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OBS12	2167
OBS12	2169
OBS12	2451
OBS12	2465
OBS12	2469
OBS12	3705
obs12	3706
OBS12	5414
OBS12	5416
OBS12	5440
OBS12	5553
OBS12	6234
OBS12	6248
OBS12	8405
OBS13	0134
OBS13	0211
OBS13	0218
OBS13	0401
OBS13	0414
OBS13	0433
OBS13	0480
OBS13	0623
OBS13	1613
OBS13	1620
OBS13	1632
OBS13	1638
OBS13	2155
OBS13	2160
OBS13	2167
OBS13	2169
OBS13	2451
OBS13	2469
OBS13	3127
OBS13	5420
OBS13	5433
OBS13	5546
OBS13	5553
OBS13	5566
OBS13	6229
OBS13	6288
OBS13	8404
OBS13	8408

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The number of entries for Phase 2 is 441 and has been confirmed. The Phase 2 list is included.

**Phase 2 Observers and Routes**

<b>ObserverCode</b>	<b>RoutNumberCode</b>
OBS09	0102
OBS09	0105
OBS09	0114
OBS09	0130
OBS09	0249
OBS09	0252
OBS09	0254
OBS09	0376
OBS09	0380
OBS09	1132
OBS09	1133
OBS09	1142
OBS09	1145
OBS09	1148
OBS10	4225
OBS10	4239
OBS10	4254
OBS10	4910
OBS12	1148
OBS12	8711
OBS12	8735
OBS12	8747
OBS13	4214
OBS13	4235
OBS13	4241
OBS13	4909
OBS13	4917
OBS13	8701
OBS13	8702
OBS13	8726
OBS13	8735
OBS13	8736
OBS13	8744
OBS13	8759
OBS14	0815
OBS14	0820
OBS14	0822
OBS14	0823

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OBS14	0825
OBS14	0828
OBS14	0830
OBS14	0832
OBS14	1579
OBS14	1581
OBS14	4234
OBS14	4243
OBS14	4909
OBS15	0382
OBS15	1132
OBS15	1142
OBS15	1579
OBS15	1581
OBS15	2201
OBS15	2203
OBS15	2205
OBS15	2213
OBS15	2215
OBS15	4234
OBS15	4243
OBS16	0101
OBS16	0467
OBS16	0711
OBS16	0716
OBS16	1606
OBS16	4232
OBS16	4248
OBS16	4258
OBS16	4259
OBS16	4265
OBS16	4285
OBS16	4908
OBS16	4915
OBS16	4940
OBS16	4944
OBS17	0116
OBS17	0124
OBS17	0244
OBS17	0806
OBS17	0807
OBS17	0809
OBS17	0811
OBS17	0821
OBS17	0824
OBS17	0827

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OBS17	0831
OBS17	4272
OBS17	8701
OBS17	8717
OBS17	8735
OBS17	8759
OBS18	0803
OBS18	0807
OBS18	0808
OBS18	0811
OBS18	0816
OBS18	0819
OBS18	0824
OBS18	1401
OBS18	1457
OBS18	1579
OBS18	1581
OBS18	4234
OBS18	4243
OBS19	0146
OBS19	0164
OBS19	0406
OBS19	0424
OBS19	0825
OBS19	1101
OBS19	1131
OBS19	1901
OBS19	1929
OBS19	2214
OBS19	2219
OBS19	6156
OBS19	6410
OBS19	8744
OBS20	1411
OBS21	0105
OBS21	0337
OBS21	1111
OBS21	1121
OBS21	1913
OBS21	2215
OBS21	2227
OBS21	6157
OBS21	6419
OBS22	1411
OBS22	1475
OBS22	1507

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OBS22	1508
OBS22	1586
OBS22	8744
OBS23	8717
OBS24	0101
OBS24	0716
OBS25	1132
OBS25	1133
OBS25	1145
OBS25	1148
OBS25	4230
OBS25	4234
OBS25	4254
OBS25	4912
OBS25	4916
OBS25	4917
OBS25	4920
OBS25	4931
OBS26	8701
OBS26	8717
OBS28	0415
OBS28	0426
OBS28	0801
OBS28	0817
OBS28	0820
OBS28	0822
OBS28	0825
OBS28	0828
OBS28	0830
OBS28	1581
OBS28	2717
OBS28	4273
OBS28	4275
OBS29	0320
OBS29	1581
OBS29	2417
OBS29	3707
OBS29	3716
OBS29	4234
OBS29	4254
OBS29	8212
OBS29	8218
OBS30	0106
OBS30	0107
OBS30	0115
OBS30	0119

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OBS30	0123
OBS30	0240
OBS30	0247
OBS30	0255
OBS30	0305
OBS30	0370
OBS30	0373
OBS30	0379
OBS30	0383
OBS30	1049
OBS30	1581
OBS30	2206
OBS30	2211
OBS30	2214
OBS30	2224
OBS30	2402
OBS30	2407
OBS30	2411
OBS30	3704
OBS30	3709
OBS30	8217
OBS30	8221
OBS31	0374
OBS31	1142
OBS31	1507
OBS31	1579
OBS31	1581
OBS31	1586
OBS31	2207
OBS31	2219
OBS31	2221
OBS31	2225
OBS31	4234
OBS31	4243
OBS32	8701
OBS32	8717
OBS32	8729
OBS32	8735
OBS32	8739
OBS32	8744
OBS32	8759
OBS33	0102
OBS33	0411
OBS33	0432
OBS33	0711
OBS35	0120

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OBS35	0378
OBS35	1411
OBS35	1475
OBS35	1507
OBS35	1508
OBS35	1586
OBS35	8714
OBS35	8727
OBS35	8744
OBS35	8756
OBS35	8759
OBS35	8770
OBS36	0105
OBS36	0337
OBS36	1101
OBS36	6156
OBS36	6410
OBS37	0146
OBS37	0164
OBS37	0406
OBS37	0424
OBS37	1121
OBS37	1901
OBS37	1917
OBS37	1929
OBS37	2214
OBS37	2219
OBS37	4271
OBS37	4275
OBS37	6157
OBS37	6419
OBS38	0320
OBS38	0424
OBS38	0498
OBS38	0611
OBS38	0802
OBS38	1401
OBS38	1457
OBS38	2417
OBS38	3707
OBS38	3716
OBS38	4213
OBS38	4257
OBS38	4262
OBS38	4906
OBS38	4908

RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES

OBS38	4920
OBS38	4926
OBS38	4931
OBS38	4940
OBS38	4944
OBS38	8212
OBS38	8218
OBS39	0101
OBS39	0129
OBS39	1411
OBS39	1475
OBS39	1507
OBS39	1508
OBS39	1586
OBS40	0108
OBS40	0111
OBS40	0241
OBS40	0246
OBS40	0250
OBS40	0375
OBS40	0377
OBS40	1132
OBS40	1133
OBS40	1142
OBS40	1145
OBS40	1148
OBS40	2202
OBS40	2210
OBS40	2212
OBS40	2216
OBS42	1579
OBS42	8701
OBS42	8717
OBS43	0305
OBS43	0405
OBS43	0424
OBS43	0474
OBS43	0498
OBS43	0611
OBS43	1049
OBS43	2402
OBS43	2407
OBS43	2411
OBS43	3704
OBS43	4906
OBS43	4908



RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES

OBS43	4909
OBS43	4910
OBS43	4915
OBS43	4917
OBS43	4926
OBS43	4940
OBS43	4945
OBS43	8217
OBS43	8221
OBS45	0415
OBS45	0426
OBS45	1148
OBS45	1579
OBS45	2227
OBS45	2717
OBS45	4234
OBS45	4254
OBS45	4273
OBS45	4909
OBS45	4945
OBS46	0243
OBS46	0256
OBS46	1411
OBS46	1508
OBS46	1579
OBS46	4207
OBS46	4221
OBS46	4233
OBS46	4238
OBS46	4249
OBS46	4908
OBS46	4910
OBS46	8701
OBS46	8702
OBS46	8703
OBS46	8705
OBS46	8717
OBS46	8735
OBS46	8744
OBS46	8748
OBS46	8759
OBS47	0405
OBS47	0467
OBS47	0621
OBS47	1605
OBS47	1606

RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES

OBS48	0621
OBS48	1475
OBS48	1508
OBS48	1586
OBS48	1605
OBS48	4234
OBS48	4242
OBS48	4254
OBS48	4906
OBS48	4908
OBS49	1581
OBS49	8701
OBS49	8735
OBS50	1132
OBS50	1142
OBS50	1145
OBS50	1581
OBS50	4906
OBS50	4910
OBS50	4915
OBS50	4917
OBS50	4920
OBS50	4926
OBS53	0102
OBS53	0116
OBS53	0242
OBS53	8744
OBS53	8759
OBS54	0106
OBS54	0111
OBS54	0112
OBS54	0117
OBS54	0128
OBS54	0131
OBS54	0244
OBS54	0251
OBS54	0281
OBS54	0384
OBS54	0827
OBS54	0831
OBS54	1507
OBS54	4234
OBS55	0103
OBS55	0110
OBS55	0126
OBS55	0245

RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES

OBS55	0248
OBS55	0253
OBS55	0254
OBS55	0257
OBS55	4254
OBS55	4940
OBS55	4944
OBS56	0104
OBS56	0113
OBS56	0372
OBS57	0256
OBS57	1475
OBS57	1579
OBS57	4222
OBS57	4225
OBS57	4229
OBS57	4910
OBS57	4920
OBS57	4944
OBS57	8701
OBS58	4219
OBS58	4228
OBS58	4237
OBS58	4945
OBS58	4999
OBS59	0110
OBS59	0130
OBS59	0371
OBS60	4211
OBS61	4211
OBS61	4218
OBS61	4224
OBS61	4236
OBS61	4265
OBS61	4917

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-32.** At page 14 of your testimony, you state that Phase 1 included observations of 106 routes. However, at pages 2-5 of your response to MPA/USPS-T13-16, you list 148 unique routes (by "route code number") in Phase 1. With respect to this disparity:

(a) Does this difference represent routes that were observed for some purpose but that were not included in the database submitted in this proceeding? If so,

(i) Please describe in full the purpose of these route observations.

(ii) Please explain why the observations were excluded from the database.

(iii) Please provide all data that was collected for these routes.

(b) Is this disparity due to errors in the observer/route information you provided in response to MPA/USPS-T13-16? If so,

(i) Please provide a corrected version of your response in both hardcopy and electronic spreadsheet format.

(ii) Please separately identify, by observer code and route code, each erroneous entry and the corresponding correct entry.

(c) If not fully explained in your above responses, please reconcile and explain this disparity, and provide any resulting corrections that need to be made to your testimony, your interrogatory responses, or the data submitted in this proceeding.

**RESPONSE:**

(a) Yes. The observer/route information listed 148 unique routes. The Phase 1

Observer and Routes listing in the response to MPA/USPS-T13-16 was not intended to identify unique routes. The MPA/USPS-T13-16 response is a list of which observers observed which routes. The difference between the 106 routes included in the database submitted in this proceeding and the 148 unique routes identified in the response to MPA/USPS-T13-16 is that the 106 routes is the number of unique

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

routes included in LR-I-163 provided to witness Baron. The difference of 42 routes represents those routes that were not included in the data presented to witness Baron.

- (i) These routes not included were intended to be part of the study in the same manner as those that were included.
  - (ii) These were not included in the data provided to witness Baron because of various problems that dictated their exclusion. Refer to response to ADVO/USPS-T13-63(v). Among the considerations for exclusion were:
    - The routes were Auxiliary routes or routes less than 8 hours
    - Hardware problems adversely affected the collection of data on the routes (e.g., malfunctioning video camera or bar code scanner)
    - the routes were not listed in the National Database (and thus no supporting documentation such as Postal Service forms 3999x could be located) or there were missing/damaged field materials
  - (iii) All scanned data is provided in the zipped Access® File, ADVO 32 iii 4\_26\_00, to be provided in a library reference. All hard copies have been made available for review under protective conditions.
- (b) No.
- (c) See (a), (b) above.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

ADVO/USPS-T13-33. At page 14 of your testimony, you state that Phase 2 included observations of 234 routes. However, at pages 6-15 of your response to MPA/USPS-T13-16, you list 231 unique routes (by "route code number") that were observed in Phase 2. With respect to this disparity:

- (a) What is the correct number of Phase 2 routes for which observations are included in your database in this proceeding.
- (b) Is this disparity due to errors in the observer/route information you provided in response to MPA/USPS-T13-16? If so,
  - (i) Please provide a corrected version of your response in both hardcopy and electronic spreadsheet format.
  - (ii) Please separately identify, by observer code and route code, each erroneous or omitted entry and the corresponding correct entry.
- (c) If not fully explained in your above responses, please reconcile and explain this disparity, and provide any resulting corrections that need to be made to your testimony, your interrogatory responses, or the data submitted in this proceeding.

**RESPONSE:**

(a) 234.

(b) There is no disparity. A route code can appear in more than one ZIP code. Thus, identical route codes may represent more than one route.

N/A.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-34. Please indicate how many separate entries or scans the data collector was required to make when recording a single observation. If the number of required scans varied depending on the type of observation, please explain the differences.**

**RESPONSE:**

For each Outside Work Sampling tally the observer was required to make six scans. To perform the first half of a Time Study the observer would make a minimum of five scans and to complete the second half of the Time Study the minimum of five scans with up to a maximum of seventeen additional Event Quantities. One to two additional scans per hour may be made to record Temperature and Humidity, Wind, or Rain, or Snow, or Hail. Typically at the end of day there could be up to 53 Study Quantities scanned.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

ADVO/USPS-T13-35. In your response to MPA/USPS-T13-16, you provided a list correlating the data collectors (by observer code number) with the routes observed (by route code number) during the Phase 1 and Phase 2 data collections. The following table, compiled from your response to MPA, shows the total number of different (unduplicated) routes identified for each data collector, by code number.

Observer	# of Routes
2	12
4	24
5	1
6	21
7	49
8	16
9	14
10	4
12	29
13	41
14	13
15	12
16	15
17	16
18	13
19	14
20	1
21	9

Observer	# of Routes
22	6
23	1
24	2
25	12
26	2
28	13
29	9
30	26
31	12
32	7
33	4
35	13
36	5
37	14
38	22
39	7
40	16
42	3

Observer	# of Routes
43	22
45	11
46	21
47	5
48	10
49	3
50	10
53	5
54	14
55	11
56	3
57	10
58	5
59	3
60	1
61	6

(a) Please confirm that this table accurately lists for each data collector the total number of different routes identified for that collector in your response to MPA.

(b) Please confirm that 22 of the 61 data collectors worked on fewer than ten routes, and that 16 worked on five or fewer routes.

(c) If you cannot confirm either of the above, please explain why not, provide the figures that you believe to be correct, and explain the source and basis for your figures.

**RESPONSE:**



**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

(a) Not confirmed. A corrected table is provided below. This table is based on the entire database for the ES study. Since I do not know how you compiled your table, I cannot explain the difference between your table and mine.

Observer	# of Routes
2	12
4	24
5	1
6	21
7	45
8	15
9	14
10	4
12	29
13	40
14	13
15	12
16	15
17	16
18	13
19	14
20	1
21	9

Observer	# of Routes
22	6
23	1
24	2
25	12
26	2
28	13
29	9
30	26
31	12
32	7
33	4
35	13
36	5
37	14
38	22
39	7
40	16
42	3

Observer	# of Routes
43	22
45	11
46	21
47	5
48	10
49	3
50	10
53	5
54	14
55	11
56	3
57	10
58	5
59	3
60	1
61	6

(b) Confirmed. Note, however, that the observers also acted as the second observer as part of a two-person team, and thus made many more observations than are apparent from tables based on scans of the observer of record.

(c) See (a) and (b) above.

RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES

ADVO/USPS-T13-36. In response to ADVO/USPS-T13-11 (a), requesting why two-person teams were required to collect the data, you state that "one would drive the car and the other would scan and collect data." In response to part (b) of that question, you state:

"Every six minutes, when the scanner beep went off, they typically performed the work sampling. They would take time studies of the various outside activities counting the appropriate items such as: number of paces walked, number of delivery points served, number of doors and gates, number of weighted or un-weighted bends made, number of trays/tubs handled, distance in tenths of miles, final odometer reading. The team also had a daily comments log for making notes about any special events, and corrections to scans. They would also videotape outside activities for approximately 1/2 hour. The video would be shot at various times throughout the street time."

(a) Please confirm that, except for the first sentence of this quote, all of the other activities described above were in addition to the task of scanning observations at six-minute intervals.

(b) For each of the above described activities, please identify which ones were performed by the person who drove the car, and which ones were performed by the other person who scanned and collected data. If you do not know, please so state. Please provide documentation to support your answer.

RESPONSE:

(a) Confirmed.

(b) The teams shared the responsibilities of performing the various tasks and I have no way of determining which team member performed which tasks. The use of the two person teams helped to ensure that the data desired was collected and which team member (s) actually performed the task was not important to me.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

ADVO/USPS-T13-37. At page 21 of Appendix C to your testimony, showing an example of an "observers barcode sheet used for the start of day," the first barcode entry shown is for "Observer," with the notation "Scan once per day."

- (a) Was this the first item scanned by a data collector?
- (b) Was this the only point in the scanning process where information identifying the data collector could be entered? Please explain.
- (c) Does this mean that on a given route-day for observations of a particular route, only one observer is identified for all tallies recorded on that route that day? Please explain.
- (d) During the course of the day in observing a particular route, did the two-person data collector teams ever switch roles (e.g., observer A scanning observations in the morning and observer B scanning in the afternoon; observer B doing scanning during portions of the day while observer A was doing other tasks or on personal break; etc.). If not, please explain the basis for your conclusion that observers never switched roles, and reconcile your answer with your response to ADVO/USPS-T13-11.
- (e) If data collectors ever did switch roles in scanning observations during the course of the day, was there any procedure by which information identifying the new "observer" could be entered or recorded, either in the scanned database or otherwise? If so, please explain fully how this was accomplished.
- (f) For a particular observation (tally), is there any way to identify -- either from the database provided in this proceeding, or from available information which has not been provided -- which data collector actually recorded the observation if the collectors switched roles at any time after the start of the day?
- (g) Please provide all available information and data that would enable a matching of a specific observation (tally) with the data collector that actually scanned the observation (as opposed to the data collector recorded as the "Observer" at the start of the day). Please provide this information in both hard copy and database or spreadsheet format.
- (h) Please provide all documentation and instructions to the data collectors on how and when they were to enter or record information identifying which of them was actually scanning observations, and what to enter or record if they switched the scanning task after the start of the day.

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TO ADVO INTERROGATORIES**

**RESPONSE:**

(a) Yes, the first item scanned was the Level 1 Observer.

(b) Yes, Level 1 is the only point in the scanning process to input the information to identify the data collector. Note that Level 1 can be scanned in a multiple times during the day, at any point at which the observers wished to identify the observer of record.

(c) No, more than one observer may have scanned in data during a given day and there can be more than one observer code associated with a route.

(d) Yes. Please see my response to ADVO/USPS-T-13-11.

(e) If or when data collectors switched roles they could scan Level 1 Observer with their code and all remaining scans would have been linked to them until the process was repeated by their partners. They were not required to scan in a new observer code when switching roles.

(f) No, because observers were not required to scan in a new observer code when switching roles, there is no absolute way to identify which observer actually made a particular scan.

(g) I cannot provide any information that will enable the requested determinative matching. See (e), (f), above.

(h) There is no documentation for providing instructions to the observers on what actions they were to take when switching roles. I was interested in getting the data and definitive records as to which of the trained observers actually made the scan was not of high importance to me. The decision as to who actually made the scans and frequency of changing the observer of record was left up to the data collection teams.

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TO ADVO INTERROGATORIES**

ADVO/USPS-T13-39. In your responses to ADVO/USPS-T13-13 through 16, you state that:

- "No written instructions were provided" to data collectors on how to review for accuracy of scans and manual entries, and that "all training was on the job." [Question 13(a)]
- There were no written instructions given to supervisory individuals on how they were to review the accuracy of scans and manual entries. [Question 13(b)]
- "No records were maintained on the number of route days requiring change." [Question 13(c)]
- "No records were maintained on the number of individual observations changed." [Question 13(d)]
- A list of the types of changes that were forwarded to the central database managers is "not available." [Question 13(d)]
- "No instruction manuals exist" with respect to the central database managers. [Question 14(a)]
- "No summary records are available" with respect to changes forwarded from the site that were not implemented by the database managers. "The audit trail exists, but only in raw collected form." [Question 15(a)]
- There is no list of the "types of errors identified by the database managers" and "no summary records are available." "The audit trail exists but in raw collected form." [Question 15(c)]
- "No summary records are available" on the types of errors that were purged from the data set. "The audit trail exists but only in raw collected form." [Question 16(a)].
- "No summary records are available" on the number of observations (tallies) that were purged. "The audit trail exists but only in raw collected form." [Question 16(d)]
- "No summary records are available" on the number of route-days for which observations (tallies) were purged. "The audit trail exists but only in raw collected form." [Question 16(e)]

With respect to these answers, please respond to the following:

- (a) Do these answers mean that the only way to determine and verify the

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

number and kinds of changes that were made would be through a page-by-page review of the "raw collected" data forms? If your answer is anything other than "yes," please explain fully.

(b) Do the "raw collected" data forms identify all changes that were made, including both on-site changes and database manager changes? If not, please explain fully.

(c) Have all of the raw collected data forms for all route-days of observations been retained? If so, please explain in detail how the data form files are organized.

(d) Please state the total number of pages of "raw collected" data forms and/or other documents that are included in the "audit trail." If you do not know, please provide your best estimate and state its basis.

**RESPONSE:**

(a) Yes.

(b) The "raw collected" data forms are to supposed to include identification of the changes requested by the data collectors and the database managers.

(c) Virtually all of the raw collected data forms for all route days of observations have been retained. I recall one or two sets being so wet or mangled that they could present a problem and I believe one or two sets never made it through the mail. The forms are in four-inch three-ring binders organized by CY code and date.

(d) There are 240 binders with an estimated 151,000 pages.

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**ADVO/USPS-T13-40. In the Postal Service's Objection to Advo Interrogatories ADVO/USPS-T13-2 and 19(c) to Witness Raymond, dated March 3, 2000, the Postal Service states that:**

**"In these many capacities, Mr. Raymond has worked under many contracts, each contributing to some extent to the generation of the data presented in witness Raymond's testimony."**

**With respect to each such contract that "contribut[ed] to some extent to the generation of the data presented in witness Raymond's testimony," please provide the following:**

- (a) A full description of the original work plan proposed to the USPS for each contract.**
- (b) The statement of work and list of deliverables for each such contract,**
- (c) List of reports, analyses, and all other documentation prepared on each contract.**
- (d) Contract initiation and completion dates for each contract,**
- (e) An explanation of the manner in which the contract "contribut[ed] to some extent to the generation of the data presented in witness Raymond's testimony."**

**RESPONSE:**

**(a-d) Please see USPS LR-I-252.**

**(e) My work under each contract was essentially part of the overall engineered standards project. I do not at this point in time recall in any significant detail the particular activities in which I was engaged under each.**

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TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-41. With respect to your response to MPA/USPS-T13-1 and the Foot Access, Curblin Access, and the Load Time Variability Tests:**

- (a) When were you first made aware of these data collections?**
- (b) What knowledge do you have of these data collections?**
- (c) What materials have you read and reviewed on these data collections?**

**RESPONSE:**

**(a-c) When, in my response to MPA/USPS-T13-1, I referred to the STS study, I actually intended to refer to the Foot Access, Curblin Access and Load Time Variability Tests as well. In my mind, based on my limited knowledge of them, all of these essentially comprise a single, earlier data collection effort. I learned of them all at essentially the same time, during August – September 1999, well after I had completed my data collection. I do not know a great deal about them. I have only read the definitions as stated in Appendix F of my testimony, and I have been made aware that the initial study (studies) was (were) accomplished by carriers self reporting after being paged.**



**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-42. In your response to MPA/USPS-T13-22, you state that "Outside activities began when the carrier clocked to the street or when the carrier walked by the clocking station with the mail on the way to load the vehicle."**

**(a) Typically, prior to leaving the unit for the route, how many times does a carrier go between the inside of the unit and his vehicle?**

**(b) What are the USPS requirements as to when to clock to the street?**

**(c) Did the data collectors make the decision as to when "outside activities" began? If not, who did?**

**(d) If the data collectors made the decision as to when "outside activities" began, how were they instructed to choose between the two options you gave them?**

**RESPONSE:**

**(a) Typically, prior to leaving the unit for the route, the carrier makes one additional trip between the inside of the unit and his vehicle to perform a vehicle inspection. This trip is typically much earlier in the day around morning break time.**

**(b) The USPS requirements as to when to clock to the street are that the carrier performs the clock-to-street on the way past the clock on the way to load the vehicle.**

**(c-d) Typically the data collector's decision as to when "outside activities" began was very obvious as the carrier is pushing the hamper with parcels, accountables, and trays/tubs of cased mail out to the vehicle and stops by the swinging doors, side steps to the clock and clocks to the street. On very rare occasions when a carrier may have forgotten to clock-to-the-street/outside, the data collectors would have used their judgment regarding when to use the outside codes.**

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-43. In your response to MPA/USPS-T13-22, you state that "Outside activities ended when the carrier clocked back into the office after performing the street activities or when the carrier walked by the clocking station with the empty tubs/trays and mail collected on the way to put items away and/or perform other PM activities."**

**(a) Typically, after arriving at the unit from his route, how many times does a carrier go between the vehicle and the inside of the unit?**

**(b) What are the USPS requirements as to when to clock to the street?**

**(c) Did the data collectors make the decision as to when "outside activities" began? If not, who did?**

**(d) If the data collectors made the decision as to when "outside activities" began, how were they instructed to choose between the two options you gave them?**

**RESPONSE:**

**(a) Typically, after arriving at the unit from his route, the carrier goes between the vehicle and the inside of the unit once.**

**(b-d) See response to ADVO/USPS-T13-42.**

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-44. Please identify the sites (a) originally selected by the USPS and (b) those selected at random, that were ultimately unobserved:**

**RESPONSE:**

**(a-b) I am not aware of any sites that were picked that we did not observe.**

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TO ADVO INTERROGATORIES**

ADVO/USPS-T13-45. Please refer to your response to MPA/USPS-T13-31 where you state that the term "Engineered Standard Implementation test site" means a location/site used to test the engineered methods, standards and applications that were developed." However, your testimony at page 8, line 14 appears to use the term to indicate a Phase 2 data collection location.

(a) Were the engineered methods, standards and applications developed prior to the Phase 2 data collection? Please explain.

(b) Were other observations or tests occurring at the same time that the LR-I-163 data were being collected? If so,

(i) Please describe the nature of such other observations or tests and the general type of information collected.

(ii) Please explain the relationship between the other observations or tests and the LR I-163 data collection effort and data?

(c) Were any of the Phase 1 locations also "Engineered Standard Implementation test sites?"

**RESPONSE:**

(a) Yes, an iteration of engineered standards were developed using Phase 1 data.

These standards were not tested. Engineered methods and standards continued to be developed concurrently with data collection.

(b- i,ii) Yes. Five route days of data ( CY04, Routes 4908 on 12/18/97, 4917 on 3/12/98, 4920 on 12/12/97, 4940 on 12/15/97, and 4999 on 1/30/98) were from an implementation test site where engineered standards had been installed and were being tested. The process used to collect this data was exactly the same-as all other data collection days. All other data were collected from sites before any testing. As far as what other observations, their nature and relationship, were made at the same time that

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
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the data in USPS LR-I-163 was occurring, please see my response to NAA/USPS-T13-

3.

(c) Yes, CY04 was a site where data was collected in Phase 1 and 2 and was an Engineered Implementation test site.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-46. Once it was determined that 30-day studies were not possible, what rules were used to determine the calendar days actually studies and how many days a multiple-day study would take?**

**RESPONSE:**

Data collectors were left on the routes for as many days as possible (up to a potential 30 days), and were removed only when their services were required to work on other pressing aspects of the ES project. These decisions were made on a case-by-case basis.

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TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-47. Please refer to your response to MPA/USPS-T13-40 concerning correction of incorrect barcode scans out in the field.**

- (a) Which observer maintained the comments log -the one that handled the barcode reader or the other individual who was driving the car?**
- (b) Are the original marked up reports and videotapes still available?**
- (c) During this specific data collection, how long (in hours) was the typical workday for your data collectors, including all preparation time before the start of data collections and time spent after the observations in analyzing and correcting the day's observations?**

**RESPONSE:**

- (a) The data collector operating the wand would maintain the comments log; therefore there may be more than one set of comment logs for a given route day.**
- (b) The original marked up reports and videotapes are still available. These items were made available for inspection pursuant to Presiding Officer's Ruling No. R2000/27.**
- (c) The typical work day for data collection was ten to twelve hours per day in a three day shift.**

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**ADVO/USPS-T13-48.** Please refer to your response to MPA/USPS-T13-43 concerning other quantitative data collected during the Engineering Standards project. Of the two data collectors in the team, which data collector manually entered the qualitative data - the one taking the every-six-minute barcode readings or the other one who was driving the car?

**RESPONSE:**

Either data collector could manually enter the quantitative data. Typically, the data collector taking the six-minute barcode readings would manually enter the quantitative data.



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**ADVO/USPS-T13-49. Please explain why the barcodes on the barcode sheet shown in Appendix C were not presented sequentially.**

**RESPONSE:**

**There is no reason to have the barcodes in sequential order. Some codes were grouped in a position for frequency of use or ease of use by the observers.**

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**ADVO/USPS-T13-50. Please refer to your response to MPA/USPS-T13-43 concerning other quantitative data collected during the Engineering Standards project.**

- (a) Were quantities of DPS, AM letters, AM flats, parcels, accountable% SPRs, DAL cards, DPS missorts, DPS out of sequence, UBBM, missorts measured for every observation day?**
- (b) Explain how each of the above (a) was measured every day.**
- (c) Were PM volumes also measured or were they already included in the above (a) volumes?**
- (d) Explain how the weight of a loaded satchel was measured.**
- (e) What was the frequency of weighing satchel loads.**
- (f) Does "delivery point" mean number of addresses, number of delivery receptacles, number of locations for delivery receptacles, or something else?**
- (g) What does number of "park points" include: only park & loop park points, number of typical park points for park & loop/dismount/central deliveries, park points for (non-typical) deviation deliveries (e.g., for non-routine parcel drops, pickups from other units or customers, etc.), or something else?**
- (h) Were the number of actual (covered) deliveries or stops also collected each route-day? Please provide any such data by route-day.**
- (i) Were average distances between "deliveries" or "stops," average distances for "accesses," average looping distances, or any other outside distances along the route measured in some way? If so, how?**
- (j) Was distance or travel time between unit and beginning/end of route measured in some way? If so, how?**

**RESPONSE:**

**Please note the information requested in these questions does not relate to the work sampling tallies provided to witness Baron.**

- (a) No. Refer to ADVO/USPS-T13-61 response.**

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(b) On the days when the quantitative data was measured, the measurement process is as follows:

**-DPS quantity:** End of Run report, a post office generated report

**-AM letter quantity:** Prior to the start of data collections, any letters at the workstation were manually counted, one individual piece at a time. Additionally, prior to the start of data collections, any letters brought to the workstation by clerks were also counted in the same manner. After the start of data collections, the observer who was not taking the every-six-minute barcode readings would observe the carrier casing letters and count and record the letter pieces being cased.

**-PM letter quantity:** Prior to the start of data collections, any flats at the workstation were manually counted, one individual piece at a time. Additionally, prior to the start of data collections, any flats brought to the workstation by clerks were also counted in the same manner. After the start of data collections, the observer who was not taking the every-six-minute barcode readings would observe the carrier casing flats and count and record the flat pieces being cased.

**-Parcel quantity:** There were three ways parcel quantities could be measured. First, the data collectors could check the parcel hamper and manually count the parcels in the hamper. Second, the carrier once in a great while brought the parcel hamper to the workstation prior to pulldown and adjusted/sorted parcels.

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At this time, a parcel count could be taken by observing the number of parcels the carrier was handling. Finally, when the carrier loaded the vehicle, a parcel count could be taken by observing the number of parcels the carrier was handling.

-Accountable quantity: When the carrier received and signed for accountables from the accountable clerk, a count was taken by checking the Accountable Mail Log the carrier signs when receiving accountables. This log includes the quantity of accountables the carrier received.

-SPR quantity: There were three ways SPR quantities could be measured.

First, the data collectors could check the parcel hamper and manually count any SPR's in the hamper. Second, the carrier often brought the parcel hamper to the workstation prior to pulldown and sorted SPR's. At this time, an SPR count could be taken by observing the number of SPR's the carrier was handling. Finally, when the carrier loaded the vehicle, an SPR count could be taken by observing the number of SPR's the carrier was handling.

-DAL card quantity: If the DAL cards were still bound, the quantity of DAL cards was recorded from the pre-printed 'inventory' slip included with the cards. If the cards were not bound, a manual count of individual cards was taken.

-DPS missort quantity: At the end of the day, upon return to the station, the data collectors would ask the carrier for a count of DPS missorts.

-DPS out of sequence quantity: At the end of the day, upon return to the station, the data collectors would ask the carrier for a count of DPS out of sequence.

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-UBBM quantity: Carriers usually had receptacles at the workstation marked 'UBBM'. After the start of data collections, the observer not recording the every-six-minute barcode readings who is counting the pieces of mail being cased would also record the number of pieces the carrier puts in the receptacle labeled 'UBBM'.

-Missort quantity: The data collectors would ask the carrier how he/she handled missorts. The carrier would indicate to the data collectors where he/she places missorts. After the start of data collections, the observer not recording the every-six-minute barcode readings who is counting the pieces of mail being cased would also record the number of missort pieces the carrier places in the 'missort' section at the case. The missort section could have been a corner of the ledge or an empty section in the case itself.

(c) PM volumes were not measured. PM volumes were included in the volumes above (a) volumes.

(d) The weight of a loaded satchel was measured with a mechanical or an electronic, digital, 50-lb. scale with an attached hook – a scale commonly used for weighing fish. Just prior to weighing the satchel the data collector would reset the digital scale to 0.0 pounds/ounces to ensure an accurate weight reading. If the weighing of the satchel would not hold up or impede the carrier, the weight reading of the loaded satchel would be taken. After a carrier loaded the satchel, one of the data collectors would, in the presence of the carrier, momentarily take the satchel and hang the satchel on the hook attached to the scale. After a few seconds when the digital

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reading remained constant, the data collector immediately returned the satchel to the carrier and recorded the weight reading (rounding up to the nearest pound) minus the weight of an empty satchel, usually 3 lbs. The weight of the empty satchel is determined prior to the start of data collections and prior to the arrival of the carrier. When the data collectors arrive at the workstation in the morning, the empty satchel is weighed.

- (e) The frequency of weighing satchel loads varied. If taking the satchel weight would hold up or impede the carrier, the data collectors would not take a loaded satchel weight reading. Any time a carrier loaded a satchel, most commonly at park points or loops at the vehicle, data collectors would attempt to get a weight reading.
- (f) In relation to 3999x, "delivery point" in my response to MPA/USPS-T13-43 refers to each individual delivery number (and secondary number if applicable) on the 3999x.
- (g) The park points were counted through the day as data collectors followed the route. This count was manually entered into the scanner. This "Park Point" represents parking the vehicle prior to starting the park and loop. Dismounts are not considered park points and were not counted as park points.
- (h) Actual (covered) deliveries or stops were not collected for every route-day. There is no electronic record of actual (covered) deliveries or stops for every route-day. If actual (covered) deliveries or stops were made, the only record of such information, if it were recorded, would be the 3999x. Examples of 3999x's were presented at the second technical conference. There is no summary record, in hard copy or

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electronic form, that indicate which of the 845 route days that were submitted to witness Baron have such information recorded. To provide the actual (covered) deliveries or stops for each route day would entail extensive research through approximately 15,000 pages of 3999x information and manually counting from each page the necessary information that relate to actual (covered) deliveries or stops.

- (i) The response to MPA/USPS-T13-43 does not indicate any 'average' distances were manually entered through the keypad on the scanner nor does the response indicate any distances were between "deliveries" or "stops", "accesses", loop distances, or any other outside distances along the route. The distances stated in the response to MPA/USPS-T13-43 are distances between the carrier's workstation and a specific location in the station or directly outside the station (e.g., distance from the workstation to the clock, distance from the workstation to the vehicle). The distances were recorded paces; the data collector would collect this information by physically walking from the workstation to a specific location in the station and counting the number of paces taken.

- (j) Yes, distance between the unit and the beginning/end of route was measured by recording odometer mileage. The travel time between the unit and beginning of route was measured by Work Sampling and occasionally Time Study.

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**ADVO/USPS-T13-52.** In response to MPA/USPS-T13-55 you state that the number of possible delivery points by type and type status are not available. However, in response to MPA/USPS-T13-43 you state that the data collectors manually entered information on number of delivery points by type (from the 3999X form).

(a) What is the distinction you are making between possible delivery points by type and the number of delivery points by type from the 3999X form?  
Please explain.

(b) Please provide in hardcopy and electronic spreadsheet format the number of delivery points by type from the 3999X form, for each route in your database.

(c) Please provide the date(s) of the 3999X form(s) for each route (route/day).

**RESPONSE:**

(a) MPA/USPS-T13-55 is referring to Delivery Type as we collected data and there are five different Delivery Types: Foot, Curb, Park & Loop, Dismount, Central. These five Delivery Types are paired with four possible Delivery Type Status: Business Inside, Business Outside, Residential Inside, Residential Outside. This information is not available at the delivery point level. The USPS form 3999X uses 1-8 codes for each delivery point and has a summary of the total number of possible delivery points on the route grouped by these 1-8 codes. These codes are not the same as the Delivery Type and Delivery Type Status.

(b) Please see ADVO/USPS-T13-17.

(c) To provide this information would require an extensive review of voluminous hardcopy material made available at the second technical conference. I will attempt to conduct this review in the time remaining, and provide the requested information soon as a library reference.



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**ADVO/USPS-T13-53.** In response to OCA/USPS-T13-I, you provide a method for determining sample size for the number of time studies that was the guide for the number of route studies.

**(a)** Please explain and provide your calculations for determining number of routes to be studied, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

**(b)** Please identify the "task(s)" that were the subject of the sample size calculations.

**RESPONSE:**

**(a-b)** Please see response to ADVO/USPS-T13-23.

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**ADVO/USPS-T13-54.** In response to OCA/USPS-T13-I (a), you state that you did "check to see if the routes, the mix of delivery points, gender, and age of carriers that we had studied matched the Postal Service percent distributions," Please provide those comparisons and analyses, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

**RESPONSE:**

Please see response to ADVO/USPS-T13-23.

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**ADVO/USPS-T13-55.** In response to OCA/USPS-T13-I (b), you indicate that you compared the data from the random routes to the USPS selected routes and found that the "data should be considered as random and representative of the population."

(a) Do you mean that you compared the LR I-163 data from the routes of the units chosen at random to that from the routes of the units selected by the USPS? If not, please identify the data compared and the routes selected by the USPS.

(b) Do you mean that you believe the data from the random routes are representative of the population of routes in the USPS system? Please explain and reconcile this with your response to OCNUSPS-T13-6 where you state that "the randomly observed routes [from the randomly chosen sites] are a respectable sample but is not large enough to represent the total population of routes."

(c) Please provide the comparisons and analyses to which you refer, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.

**RESPONSE:**

(a-c) Please see my response to ADVO/USPS-T13-23.

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**ADVO/USPS-T13-56. Did you conduct any analyses of the LR-163 data to determine whether it was representative of the system of routes on an annual basis? If so, please provide the analyses, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.**

**RESPONSE:**

**No.**

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**ADVO/USPS-T13-57. In response to OCA/USPS-T13-3, you state that you performed "analysis of data from the test sites after implementation."**

**(a) Was this analysis related to studies or analyses performed by other researchers or related to the effect of monitoring on carrier activities ? Please explain.**

**(b) If any of this analysis was specific to the work sampling data in LR I-163, please provide the analysis, including all documentation and sources, with sufficient explanation for someone to follow and replicate your results.**

**RESPONSE:**

**(a-b) This analysis was performed by us and was not related to USPS LR-I-163.**

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**ADVO/USPS-T13-58. Please refer to your response to MPA/USPS-T13-9:**

- (a) Explain fully what a "predetermined time system" is. If there is more than one type of "predetermined time system," explain which type you used.**
- (b) Explain specifically how the "predetermined time system" was used to develop or generate the LR I-163 work or activity sampling data or, alternately, how the LR I-163 data were used to develop the "pre-determined time system."**
- (c) Explain specifically how the "activity/methods descriptions and times" were used to develop or generate the LR I-163 work or activity sampling data or, alternately, how the LR I-163 data were used to develop the "activity/methods descriptions and times."**
- (d) Explain how the videotapes were used to develop or generate the LR I-163 work or activity sampling data.**
- (e) Explain how the LR I-163 work sampling data were used to support "in-depth analysis and validation of work methods" (p. 5, lines 14-15, USPS-T-13).**
- (f) When you state that "analysis were performed on the data collected," are you discussing the LR I-163 work or the activity sampling data? If so, please provide all analyses from that data, including documentation and sources, with sufficient explanation for someone to follow and replicate your results.**

**RESPONSE:**

- (a) Predetermined time systems, generally, are standard times used in industry and the service sector for performing an extremely wide variety of activities. There is more than one predetermined system. These systems have tables of times that are associated with performing various actions. The actions have specific definitions that cover the point at which the action: starts, the range and or frequencies, and the end point. The action-time may be very short in duration or cover a longer cycle time. Some systems state time in decimal minutes, some use TMUs (Time Measurement**

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Units = 100,000 TMUs/hour) or other time measurement scales. The time values for performing work are created by either manual application or through the interaction with a computer. The time for a work activity is the sum of the applicator's interpretation of which of the actions-times they pick from the tables. H.B. Maynard and Company, Inc. a world renowned industrial engineering based management consulting firm, created MTM (Methods Time Measurement) in the 1940's and this predetermined time measurement system has spread world wide and is used in many many different industries. MTM has served as the platform to create other predetermined time measurement systems such as Maynard's system MOST® (Maynard Operation Sequence Technique), which was used for creating the engineered methods and standards.

(b) My experiences in using predetermined time measurement systems have affected how I look at methods and work. These experiences impacted how the data collection was designed. There is no direct relation between LR-I-163 and predetermined time systems.

(c) The "activity/methods descriptions and times" are a product of manually applying MOST®. The methods descriptions are written on a form and the associated codes and times are noted from the predetermined time systems tables. Hence you have a written description of the work method and the time for performing the work described. The task of applying the predetermined time system was going on concurrently with the collecting of the data used to create LR-I-163. The percentage

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of time breakdown of a carriers day which was derived form other data as well as the Street portion as identified in LR-I-163 assisted in determining which parts of a carrier's day were more method sensitive and where we should focus our methods efforts.

(d) The videotapes were not used to generate LR-I-163. They were used on very rare occasions to assist in understanding why edits were necessary.

(e) The relevant passage from Page 5, lines 14-15, USPS-T-13 reads: "The data collected needed to be comprehensive in order to support in-depth analysis and validation of work methods." This statement was made in reference to the entire approach used to collect information, not just work sampling. LR-I-163 data provided information on frequencies of receptacles, percentage of time carriers can finger/prepare the mail for the next delivery while walking, amount of time spent at various locations, frequency of times carriers dismounted, and other frequency/percentage of time that assisted us in determining where to focus our resources for methods evaluation.

(f) LR-I-163 is fixed time based activity sampling data. Analysis was performed on this data, among other data, as part of the overall ES study effort. Please see my response to ADVO/USPS-T13-23.



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**ADVO/USPS-T13-59. Please refer to your response to MPA/USPS-T13-25. In your response you state that "In my opinion, we achieved this goal [of reducing any bias]."**

**(a) Please specify the type of bias were you looking for?**

**(b) Provide all analyses which you conducted on the extent of any bias.**

**RESPONSE:**

**(a-b) Please see my response to ADVO/USPS-T13-23.**


## 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: 4-28-00

## 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

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April 28, 2000