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

Postal Rate and Fee Changes, 2000 — Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO ADVO INTERROGATORIES (ADVO/USPS-T13-101, 103, 105-109)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-101, 103, 105-109, filed on March 23, 2000. Mr. Raymond is still in the process of preparing answers to interrogatories ADVO/USPS-T13-102, 104, and 110.

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

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
May 4, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-101. For LR I-221 (Engineering Standards Book of Barcodes):

(a) Please provide full expanded definitions for each Level 8.3 Mail Type barcode and each Level 8.4 Inside Task barcode (Inside Study and Outside Study).

(b) Were the Levels 8.3 and 8.4 barcode data used to develop any activity proportion data or were they used for some other purpose?

(c) Please provide full expanded definitions for each Level 9 Event Quantities barcode (Inside Study and Outside Study).

(d) Were the Level 9 barcode data (Inside Study and Outside Study) used to develop the Time Standards? Please explain.

(e) At what point(s) during the day and under what conditions were the Level 9 event quantities counted during the data collection?

(f) For each Level 9 event quantity, identify the frequency of the count.

(g) For each Level 9 event quantity, explain how it was counted.

RESPONSE:

(a-c) Note that in your question the levels are in many cases inaccurately described. The correct descriptions are emphasized in my response. Level 8.0 Event Numbers, Level 8.2 Status, Level **8.3 Mail or Vehicle Type**, Level **8.4 Inside Task** , and Level 9 Event Quantities are used for inside/office time studies. Level 8.0 Event Numbers, Level 8.2 Status, Level **8.3 Delivery or Vehicle Type**, Level **8.4 Outside Task**, and Level 9 Event Quantities are used for outside/street time studies. The time study data was used to assist data coordinators during their quality control review process of the work sampling data. The time study data was not part of LR-I-163. Levels 8.0 through 9.0 are necessary input to create a scanned in set of data for a time study. The number

of time studies taken during a study day were left up to the observation team. Their first priority was to collect the work sampling data. For definitions of the bar codes please see ADVO/USPS-T13-90 (d)(i).

(d) Yes. The time study data was used in developing the time standards. The data provided typical times for various activities that allowed for checking against the predetermined time system predicted times and identified typical quantities that the carrier encountered during performance of various work activities.

(e-f) Time studies were taken at convenient times during the day and Level 9 Event Quantities would have been counted/recorded during the time study.

(g) All Level 9 event quantities were manually counted by one or both of the team members during the time study cycle.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-103. At the delivery units observed by your data collectors,

(a) Were instructions, written or oral, given to the carriers involved in the study? If so, by whom and what were they?

(b) Were carriers involved in the study allowed to curtail mail as is usually done throughout the year or were they required to take all mail available?

(c) Were instructions, written or oral, given to the delivery supervisors assigned to the units selected for the study? If so, what were they?

(d) Did the delivery supervisors at the delivery units involved in the study play any role in the study? If so, what?

(e) Were any comparisons made between pre- or post-study office and street times and those recorded during the study? If so, please provide the results of those comparisons.

(f) Did the delivery supervisor's normal everyday activities in assessing the workload for the day, granting or denying requests for overtime or auxiliary assistance, curtailing mail, and directing hand-offs between routes continue as usual during the study? If not, what were the differences and how were these matters handled?

(g) Did the delivery supervisor's normal interaction with the carriers concerning their work continue during the study? If not, how did it change?

(h) During the study, did delivery supervisors conduct street observation of carriers involved in the study as they usually would?

RESPONSE:

(a) Oral instructions were given to the carriers typically in a stand up meeting conducted by their supervisor and a Postal Service Subject Matter Expert some time before the data collection team arrived. I was not present at these meetings but the general thrust was to advise all the carriers to perform all activities as normal, that the information being collected was going to be kept

confidential, and the information gathered on their actions was part of a larger study.

(b) All carrier activities were to remain as normal including curtailing of mail.

(c) The oral instructions given to the supervisors were the same as the carriers instructions except for the action they should take in case of any grievances that were filed.

(d) The delivery supervisors were to perform their jobs as normal. They did introduce the team members to their subjects.

(e) No comparison of pre- or post-study of office and street times were made.

(f-h) All supervisor's actions with the carriers were to remain as normal.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-105. With respect to both Phase 1 and Phase 2 of your data collection effort, please provide the following documents:

(a) All work plans or similar documents concerning the design, approach, methods, documentation, and collection of the data.

(b)) All periodic progress reports, interim reports, and final reports submitted to the Postal Service.

(c) All summaries and/or conclusions submitted to the Postal Service regarding the data collection or its results.

(d) All recommendations submitted to the Postal Service regarding the data collection or its results, including but not limited to recommendations for further studies, refinements or improvements to the study design or data collection procedures, possible uses (or limitations on uses) of the data or results, etc.

(e) For each of the categories of information described above, please also provide all documents prepared by the Postal Service or its contractors that you received relating to (a) through (d) above, including but not limited to requests for reports, conclusions, or recommendations, responses to such items, and instructions or conclusions relating to such items.

If any of the kinds of documents described above were submitted to or received from an outside contractor of the Postal Service, rather than directly to or from the Postal Service, please submit them.

RESPONSE:

(a) For all work plans or similar documents concerning the design, approach,

methods, documentation, and collection of the data please see USPS LR-I-252.

(b-e) Information responsive to these requests were made available at informal

technical conferences pursuant to Presiding Officer's Ruling R2000 – 1/27.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-106. Please refer to Appendix D of your testimony,

(a) When was Appendix D prepared?

(b) If Appendix D was prepared following the data collections for the purpose of inclusion in your testimony, is there any earlier version of it that was in existence and used at the time of the data collections? If so, please provide a copy of it. If more than one version exists, please provide all versions.

RESPONSE:

(a) Appendix D was prepared for inclusion in the testimony after the data had been collected.

(b) Yes there was an earlier version and it is attached.

USPS DELIVERY METHODS

Database Structure

LEVEL	LEVEL DESCRIPTION	DESCRIPTION	CODE
1 -7	**General Header**		
1	Observer	Scan once per day	OBSxx
2	State	Scan once per day	XX
3	Unit	Scan once per day	CYxx
3.1	Route Number	Numeric 4 digit entry	####
4	Subject Job Classification	Scan for each route number studied	JCxx
5	Subject Present	Scan when you first see the subject at work. Or when the study is completed	SPxx
6	Mileage	Scan at the beginning and end of the study then input odometer readings	Mxx
8	**Time Study**		
8.1	Event Number	Each observer uses their own set of event numbers each day. The unique number for each task controls the timing of tasks	####
8.2	Event Status	Controls the actual time the task is started and stopped	XXX
8.3	Task Type	Scan the appropriate descriptor of the task being studied	
	Mail Type (inside)	Scan the Mail type the subject is handling	PTxx
	Delivery Type (outside)	Scan the delivery route description	DTxx
	Transportation Type	Scan the type of transportation being used	TTxx
8.4	Tasks		
	Inside Tasks	Scan the task to be timed that applies to the Mail type	Yxx
	Outside Tasks	Scan the task to be timed that that applies to the delivery route	Pxx
	Transportation Tasks	Scan the task to be timed that applies to the transportation method	Vxx
9	**Event Quantities**	Scan the item(s) that were counted during the task timing	
	Counts for Mail Type	Scan each item as needed for quantity input	PCxx
	Counts for Delivery Type	Scan each item as needed for quantity input	DCxx
	Counts for Transportation Type	Scan each item as needed for quantity input	TCxx
9.1	Quantity	Input quantity that applies to the item scanned in level 9	####

10	**Work Sampling Location**			
10	Location - Inside		Scan inside location where subject is when 6 min. timer sounds	Lxx
	Location - Outside		Scan outside location where subject is when 6 min. timer sounds	
11	**Work Sampling**			
11.1	Personal		Scan specific subject personal or administrative activity if required when alarm sounds	Axx
	Non-Job Admin			Bxx
	Job Admin			Cxx
11.2	Delivery Type		Scan specific type of delivery the carrier is using, or inside	WTxx
11.3	Delivery Type Status		Scan specific type of delivery status of delivery route. for inside scan N/A	Sxx
11.4	Activities			
	Travel		Scan specific subject travel activity when alarm sounds	Txx
	Customer		Scan specific subject activity with the customer when alarm sounds	Fxx
	Inside Work		Scan specific subject inside work activity when alarm sounds	Jxx
	Outside Work		Scan specific subject outside work activity when alarm sounds	Uxx
	Delays		Scan specific subject delay when alarm sounds	Dxx
11.4.1	Activity Detail			
	Travel Details		Scan specific detail of the travel activity (if required) when alarm sounds	Kxx
	Customer Details		Scan specific detail of the customer activity (if required) when alarm sounds	Gxx
	Inside Work Details		Scan specific detail of the inside activity (if required) when alarm sounds	Exx
	Outside Work Details		Scan specific detail of the outside activity (if required) when alarm sounds	Hxx
	Delay Details		Scan specific detail of the delay (if required) when alarm sounds	Ixx

12	Beeper Occurrences		Subject pager has sounded, record occurrence here	

13	**Study Quantities**			
13	Item		Scan item to be recorded	Rxx
13.1	Quantity		Input number quantifier for specific item	####

USPS DELIVERY METHODS

Data Details

Data Level	Description	Bar Code	Bar Code Description	Comments
1 thru 7	General			
1	Observer	OBS01	Simmie Jones	
2	State	CA	California	
		FL	Florida	
		MA	Massachusetts	
		MI	Michigan	
		NJ	New Jersey	
		OH	Ohio	
		TX	Texas	
		VA	Virginia	
		WA	Washington	
		WI	Wisconsin	
3	Unit	CY01	[redacted]	
		CY02		
		CY03		
		CY04		
3.1	Route Number	Entry		Keyed entry of 4 digits
4	Subject Job Classification	JC01	Regular Carrier	
		JC02	Utility Carrier	
		JC03	PTF Part Time	
		JC04	Temporary Employee	
		JC05	Casual	
5	Subject Present	SP01	Subject is Present	Scan when subject is first sighted, ontime or late
		SP02	End of Subject Study	
6	Mileage	M01	Mileage - N/A	Total mileage traveled
		M02	Enter Odometer Numbers	Enter start then finish at end of the day

8.4	Tasks			
	Inside Tasks Yxx	Y00	Not Applicable	
		Y01	Clock (inside)	Start at clock in - fin at clock out
		Y02	Withdrawal / Return	Walk - pull case, drop off missorts and return
		Y03	Sort or Case	Sort letters or flats into case
		Y04	AM/PM Admin	Deposit 3849, Return Parcel, DPS error report
		Y05	Hot Case	Travel, pull, p/u hamper and return
		Y06	COA	All functions w/ Change of Address
		Y07	Pull Down	Pull down letter or flat case, band and load, setup relay
		Y08	Hot Case and Exit	Trvl to hot case, pull, seq., p/u DPS & clock out
	Outside Tasks Pxx	P00	Clock (outside)	Start at clock out - fin at clock in
		P01	Basic	Delivery of mail during route
		P02	Accountable	Delivery of accountable w/i loop
		P03	Dismount Accountable	Delivery of accountable on curb / dismount route
		P04	LVR Accountable	Delivery of LVR w/i loop or dismount
		P05	Parcel	delivery of Parcel w/i loop
		P06	Dismount Parcel	Delivery of Parcel on curb route
		P07	Relay Restock	Reloading satchel on walking or park & loop
		P08	Unload - Setup Central	Unloading Vehicle during delivery route
		P09	Setup - vehicle	Re-arrange vehicle
		P10	Collection	Unloading collection box at street or apt.
	Transportation Tasks Vxx	V01	Vehicle Inspection	Travel, inspect, Report and return
		V02	Load Vehicle	Travel, load and return hamper
		V03	Travel to 1st delivery	Vehicle moving to vehicle stop at 1st park point
		V04	Refueling	Vehicle stop at station to moving to route
		V05	Travel Between Points	Vehicle moving to vehicle stop at park point
		V06	Return to Unit	After last delivery and return to unit
		V07	Unload Vehicle	Unload raw mail and undelivered parcels

9	**Event Quantities**			**New level - Loop as often as needed**
	Counts for Mail Type	PC00	Not Applicable	Use this code to bypass to Work sampling
		PC01	Accountables	Number of accountables received
		PC02	Parcels	Number of parcels received
		PC03	Letters	Number of letters cased or withdrawn
		PC04	Flats	Number of flats cased or withdrawn
		PC05	Withdrawals	Number of passes made at withdrawal case
		PC06	Forms	Number of forms filled out in timing block
		PC07	Folded Flats	Number of Flats folded and sorted
		PC08	Delivery Points	Number of slots in case operation
		PC09	COA's	Number of Change of Address made
		PC10	Bends at Case	Number of Bends made by carrier in timing block
		PC11	Feet of mail	Number of trays placed in hamper after pulldown
		PC12	DPS	Number of trays of DPS Mail
		PC13	UBBM Quantity	Number of pcs of mail to UBBM throw to Tub
		PC14	Pulldown Bundles	Number of bundles generated at pulldown
		PC15	Paces Vehicle Inspection	Number of Paces used in inspecting Vehicle
		PC16	Missorts/CMUs	Number of pieces of mail the carrier places on the ledge while sorting - to be handled later
		PC17	Sequenced Flats	Number of Flats in delivery sequence
	Counts for Delivery Type			
		DC01	Paces Inside	Number of paces in basic delivery timing block inside a building
		DC02	Paces Outside	Number of paces in basic delivery timing block outside on flat ground
		DC03	Paces Outside Obstructed	Number of paces in basic delivery timing block outside with obstructions or stairs
		DC04	Bends - Weighted	Number of bends made in delivery timing block w/ Loaded Satchel
		DC05	Bends - Unweighted	Number of bends made in delivery timing block w/o Satchel
		DC06	Doors / Gates	Number of doors opened in delivery timing block
		DC07	Forms	Number of forms filled out in delivery timing block
		DC08	Residential delivery points	Number of residential delivery points in delivery timing block
		DC09	Bundles	Number of bundles carrier method used
		DC10	Customer Interaction	Number of customer interactions in delivery timing block
		DC11	Pickups	Number of collections made in delivery timing block
		DC12	Dismounts	Number of dismounts required in delivery timing block
		DC13	Illegal Boxes	Number of illegal boxes in delivery timing block
		DC14	Business delivery points	Number of business delivery points in delivery timing block
		DC15	Missed delivery points	Number of delivery points skipped in delivery timing block
		DC16	Screen / Storm Doors	Number of Screen or Storm doors opened in delivery timing block
		DC17	Trays/Tubs unloaded	Number of trays and tubs unloaded at the end of day
	Counts for Transportation Type			
		TC01	Miles	Number of miles between park points
		TC02	Park Points	Number of park points in Park & Loop route
9.1	**Quantity**			Numeric entry of quantity for selected event

10	Work Sampling		
10	Location - Inside	L00	Not Applicable
		L01	Distribution Case
		L02	Hot Case
		L03	Work Station
		L04	Accountable Cage
		L05	Parcel Area
		L06	DPS Area
		L16	Other Work Station
		L18	In unit on route to
		L22	Time Clock
		L23	Throwback Case
		L24	In unit walking
	Location - Outside		
		L07	Dock
		L08	Vehicle
		L09	Park Point
		L10	Collection Box
		L11	Relay Box
		L12	Point of delivery
		L13	On Route
		L14	PBL
		L15	Misc
		L17	Gas Station
		L19	In vehicle at Stop/Light
		L20	In vehicle in traffic
		L21	Waiting while walking
		L22	Time Clock
11.1	Personal	A00	Not Applicable
		A01	Subject Personal
		A02	Subject Break
		A03	Subject Lunch
		A04	Observer Personal
	Non-Job Admin	B01	Safety Meeting
		B02	Service Meeting
		B03	Awards Meeting
		B04	Union
		B05	Training
	Job Admin	C01	Survey
		C02	Forms
		C03	Supervisor Instructions
		C04	Carrier Markup & Recond.
		C05	Other - specify
		C06	Vehicle Inspection
11.2	Delivery Type (new)	WT00	Not Applicable
		WT07	Inside
		WT01	Foot
		WT02	Curb
		WT03	Park & Loop
		WT04	Dismount
		WT05	Central
		WT06	Vim Room
11.3	Delivery Type Status	S00	Not Applicable
		S01	Business Inside
		S02	Business Outside
		S03	Residential Inside
		S04	Residential Outside

11.4 Activities			
	T00	Not Applicable	
	T01	Travel to 1st Delivery	
	T02	Travel b/t Delivery	
	T03	Travel b/t with Sort	
	T04	Return to Unit	
	F01	Accountable	
	F02	Parcel	
	F03	Hardship	
	D08	Delay - Provide details	
	J01	Letters	
	J02	Flats	
	J03	Accountables	
	J04	Parcels	
	J05	DPS	
	J06	Mix	
	J07	Folded Flats	
	J08	Delivery / Collect	Provide details for Box type next level 11.4.1
	J09	Loading	Vehicle or Satchel in the AM
	J10	Unloading	Vehicle at the end of the day
	J11	Setup	Rearranging vehicle or satchel during the day
	D01	No Access to Box	
	D02	Vehicle Breakdown	
	D03	Mail Processing	
	D04	Weather	
	D05	Traffic/Detour	
	D06	No Work	
	D07	Other	

11.4.1 Activity Detail (new)	H00	Not Applicable	
	K00	Jeep	
	K01	LLV	
	K02	1 or 2 ton truck	
	K03	Pickup / Van	
	K04	Walking - Push Cart	
	K05	Bike	
	K06	Bus - Public	
	K07	Automobile	
	K08	Elevator - Passenger	
	K09	Walking inside unit	
	K10	Walking Outside on flat	
	K11	Walking Outside Obstructed	
	K12	Train - Public	
	E01	Sort	
	E02	PullDown	
	E03	Mat'l Handling	
	E04	Loop and Fan	
	E05	Letter sort empty	Sorting letters into an empty case slot
	E06	Letter sort partial	Sorting letters into a case slot with 1 or 2 letters
	E07	Letter sort medium	Sorting letters into a case slot with 3 or more letters
	E08	Letter sort full	Requires 2 hands to insert a letter into a slot
	E09	Flat sort vertical	
	E10	Flat sort horizontal	
	E11	Flat sort sequenced	
	H01	Illegal Mail Box	
	H02	1 Handed Slot	
	H03	2 Handed Slot	
	H04	Slot below knees	
	H05	Flat Receptacle	
	H06	#1 Box	
	H07	# 1-1/2 Box	
	H08	#2 Box	
	H09	1 Handed Slam	
	H10	Drop	
	H11	Gang Box	
	H12	Central Inside	
	H13	Central Outside	
	H14	VIM Room	
	G01	Public Relations	Number of words limited
	G02	Service Rates	
	G03	Directions	
	G04	Excessive words Customer	Customer delays carrier to chat
	G05	Excessive words Carrier	
	I01	Parking Unavailable	
	I02	Dogs	
	I03	Railroad Crossing	
	I04	Drawbridge	
	I05	Union	
	I06	Construction	
	I07	Weather	
	I08	Stuck in traffic	
12 Beeper Occurances		Carrier has a pager	Numeric entry of pager occurrences during the day

13	Study Quantities			
13	Item	R01	Temperature	Scan to input temperature at prescribed time
		R02	Humidity	Scan to input humidity at prescribed time
		R03	Wind	Scan to input wind speed at prescribed time
		R04	Rain	Scan to input rain at prescribed time
		R05	Snow	Scan to input snowat prescribed time
		R06	Bundle method	Scan to input carrier delivery method of bundles handled
		R07	Park Points per 1621	Scan to input number of park points allowed on route
		R08	Hail	Scan to input if hailing
		R09	Qty of DPS	
		R10	Am Qty of letters	
		R11	Am Qty of flats	
		R12	Carrier height in Inches	
		R13	Carrier Age	
		R14	Carrier Outseam	
		R15	Smoker	Scan code and enter 1 in qty
		R16	Right or Left handed	Scan code and enter 1 for right, 2 for left
		R17	Gender	Scan code and enter 1 for male, 2 for female
		R18	Qty of Parcels	
		R19	Qty of accountables	
		R20	Carrier weight in pounds	
		R21	Carrier forward reach in inches	
		R23	Distance to clock	Paces to clock from carrier case
		R24	Distance to Accountable Cage	Paces to Accountable cage from case
		R25	Distance to hotcase	Paces to hotcase from carriers case
		R26	Distance to Parcel hamper	
		R27	Distance to Throwback case	
		R28	Distance to Vehicle	
		R29	Vehicle relocation to dock	
		R30	Distance to dist. case 1	
		R31	Distance to dist. case 2	
		R32	Distance to dist. case 3	
		R33	Distance to dist. case 4	
		R34	Distance to dist. case 5	
		R35	Distance to VIM hamper	
		R36	Distance to Breakroom	
		R37	Distance to Restroom	
		R38	Distance to Supervisors Desk	
		R39	Distance to 1st swinging exit door	
13.1	Quantity			Numeric entry relating to scan at 13

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-107. Please refer to your response to MPA/USPS-T13-8 and 9, concerning the Engineered Standards study. As used below, the term "LR I-163 data" refers only to the data presented in that library reference, excluding other data that may have been collected but not included in the library reference.

(a) Define and distinguish among the following:
-Work sampling data
-Time studies data
-Videotape data
-Other quantitative data.

(b) Confirm that the data in USPS LR I-163 are only "work sampling" (or "activity sampling") data. If this is incorrect, please explain specifically what the data in LR I-163 are (e.g., time studies data, videotape data, or "other quantitative data").

(c) What was the specific purpose for and focus of collecting the LR I-163 data?

(d) Were the LR I-163 data used in isolation (or together with other data) to identify the "actual activities being performed by carriers along with criteria that might be effecting their activities?" Please explain fully how the LR I-163 data were used to accomplish this task.

(e) Were the LR I-163 data used in isolation (or together with other data) to identify the "methods," "time standards, and "time standards application technique/workload managing system?" Please explain fully how the LR I-163 data were used to accomplish this task.

(f) Were the LR I-163 data (or any analyses or results directly derived from that data) used as an input in the development of "time standards?" If so,

(1) Please provide any analyses or results from the data that were used as an input.
(2) Please describe precisely how the data or analyses were used as an input, including a description of the methodology employed in using the information to develop time standards.
(3) Please provide all documents relating to such use of the LR I-163 data, or analyses or results derived from that data, in developing time standards.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

RESPONSE:

(a) Work Sampling data was obtained by the act of making observations every six minutes and through the use of a TimeWand® II bar code scanner creating electronic data documenting the subject by selecting from a predefined seven level hierarchy. The work sampling data included the location of the subject, whether or not the subject was engaged in Personal, Non-Job Administrative or Job Administrative activities, if the subject is inside or outside, the outside delivery type such as curb or park & loop or a foot route or central delivery or a dismount, whether or not it was a business or residential customer, what physical activity was being performed and details about the activity. The use of the bar code process also supplied the time of day of the observation. This data was used to determine the percentage of time spent performing various activities, the variability of time spent on various activities, the percent delay time which was a direct factor used in the engineered standards, and when coupled with other data was the foundation of a set of engineered standards based on work sampling that was never used. Levels 10 through 11.4.1 as presented in USPS LR-I-221 constitute the work sampling data hierarchy and USPS LR-I-163 is the outside work sampling data presented to witness Baron. Work sampling was performed throughout the route/carriers day. The classic unit of measure is XX.X % (such as 33.9% of the time a carrier spends delivering curb is spent at the point of delivery).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

Time Studies were taken by use of the TimeWand® II bar code scanner. A time study documents the length of time of something along with other information so a rate can be determined. In this case an activity the carrier was engaged in such as casing letters would be timed and data collected on the number of letters cased so a letters cased per minute could be calculated. Levels 8.0 through 9.1 as presented in USPS LR-I-221 constitute the bar codes used for time studies. The use of the bar code process also supplied the time of day of the observation. Time studies were taken throughout the route/carriers day. The classic unit of measure is something per time (the current letter casing standard is 18 letters/minute).

Videotape data is time study data collected by counting frames (thirty frames equals one second) associated with a carrier activity as defined in the Standard Operating Practice included in USPS LR-I-242. Videotape data also includes additional data at the MOST® predetermined time system level. The classic unit of measure is something per time. The time of day of this information was also recorded.

Other quantitative data is the Level 13 data included in USPS LR-I-221. Please see ADVO/USPS-T13-100 and ADVO/USPS-T13-50 for definitions and the processes used to gather this data. The data identified criteria that might have an influence. This data was collected via the bar code approach

and each piece of data has it's own unique measure (temperature, gender, age). The use of the bar code process also supplied the time of day of the observation.

(b) Confirmed, USPS LR-I-163 is only work sampling data for street activities.

(c) Please see my responses to NAA/USPS-T13-3,4.

(d-e) LR-I-163 is a subset of a larger database. It was not used in isolation but together with other data. Please see my response to ADVO/USPS-T13-32 that identifies route days that were not included in LR-I-163 that were included in the analysis performed to support engineered standards. LR-I-163 does contain the majority of the outside work sampling data and therefore did have a direct effect on the street percent delay time used in the application and engineered standards. Please see response to MPA/USPS-T13-12 for an example of reports used to assist in developing engineered standards.

(f) Information responsive to these requests were made available at the informal technical conference pursuant to Presiding Officer's Ruling R2000 – 1/27.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-108. In your response to MPA/USPS-T13-9, you state that "Analyses were performed on the data collected. We analyzed volume data, time data extracted from the videotapes, route data, and the effects of the quantitative data."

(a) Did any of these analyses involve or use the specific data presented in LR I-163 (as opposed to other data not in LR-163)?

(b) If so, please provide any such analyses that involved or used the specific data presented in LR I-163.

(c) If not, please explain why no analyses were made on the specific data in that library reference.

RESPONSE:

(a) Yes.

(b) Please see my response to ADVO/USPS-T13-23 b. Additional information responsive to these requests were made available at the informal technical conference pursuant to Presiding Officer's Ruling R2000 – 1/27.

(c) ADVO/USPS-T13-109. Please respond to the following concerning the relationship between the work sampling data in LR I-162 and the development of engineered methods and time standards.

(a) Please confirm that "time standards," in the standard Industrial Engineering sense of the term (i.e., times for an average, qualified worker to perform specific activities such as pulling mail out of a satchel, "fingering" mail at a mailbox, opening a mailbox, opening a door to a dismount delivery, traveling outside for a certain distance, or filling out a form), were developed during the Engineered Standards project. If this is incorrect, please explain fully.

(b) Did you attempt to relate the specific work sampling data contained in LR I-163 to the time standards you developed to determine whether they were consistent with each other? If so, please explain fully how you did so and provide all analyses and documentation on that comparison. If not, please explain why not.

RESPONSE:

(a) I can not confirm because I do not agree with your definition. In the standard Industrial Engineering sense "time standards" are the times for an average qualified worker, working under normal conditions, exercising proper safety precautions, following prescribed methods, with proper supervision. The duration of the time and work content of the time standard requires definition and may or may not be dependent on the application system.

The Engineered Standards project created an In-Office-Standard and Out-of-Office Street Standard that were application dependent.

(b) No, we did not attempt to relate the specific work sampling data contained in LR-I-163 to the time standards. This comparative analysis was not requested by the Postal Service.

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: 5-4-00

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
May 4, 2000