

ORIGINAL

Official Transcript of Proceedings

RECEIVED
3 32 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Before the

UNITED STATES POSTAL RATE COMMISSION

In the Matter of: POSTAL RATE AND FEE CHANGE

Docket No. R2000-1

VOLUME 18

DATE: Tuesday, May 9, 2000

PLACE: Washington, D.C.

PAGES: 7050 - 8004

ANN RILEY & ASSOCIATES, LTD.

1025 Connecticut Avenue, N.W., Suite 1014

Washington, D.C. 20036

(202) 942-1000

BEFORE THE
POSTAL RATE COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

-----X
In the Matter of: :
POSTAL RATE AND FEE CHANGE : Docket No. R2000-1
-----X

Third Floor Hearing Room
Postal Rate Commission
1333 H Street, N.W.
Washington, D.C 20268

Volume XVIII
Tuesday, May 9, 2000

The above-entitled matter came on for hearing,
pursuant to notice, at 9:35 a.m.

BEFORE:

- HON. EDWARD J. GLEIMAN, CHAIRMAN
- HON. GEORGE A. OMAS, VICE CHAIRMAN
- HON. W.H. "TREY" LeBLANC, COMMISSIONER
- HON. DANA B. "DANNY" COVINGTON, COMMISSIONER
- HON. RUTH GOLDWAY, COMMISSIONER

1 APPEARANCES:

2 On behalf of the National Association of Letter
3 Carriers, AFL-CIO:
4 KEITH SECULAR, ESQ.
Cohen, Weiss & Simon
330 W. 42nd Street
New York, NY 10036

5 On behalf of the Newspaper Association of America:
6 ROBERT J. BRINKMANN, ESQ.
7 Newspaper Association of America
429 14th Street, NW
Washington, DC 20045

8 WILLIAM B. BAKER, ESQ.
9 Wiley, Rein & Fielding
1776 K Street, NW, Suite 1100
Washington, DC 20006

10 On behalf of the National Association of Presort
11 Mailers:
12 HENRY A. HART, ESQ.
Reed, Smith, Shaw & McClay, LLP
13 1301 L Street, NW
East Tower, Suite 1100
14 Washington, DC 20005

15 On behalf of the Classroom Publishers Association:
16 STEPHEN F. OWEN, JR., ESQ.
5335 Wisconsin Avenue, NW
Suite 920
17 Washington, DC 20015

18 On behalf of OCA-PRC:
19 KENNETH E. RICHARDSON, ESQ.
EMMETT RAND COSTICH, ESQ.
20 SHELLEY S. DREIFUSS, ESQ.
TED P. GERARDEN, DIRECTOR
Office of the Consumer Advocate
21 Public Rate Commission
1333 H Street, NW
22 Washington, DC 20005

23 On behalf of Hallmark Cards, Incorporated:
24 DAVID F. STOVER, ESQ.
SHELDON BIERMAN, ESQ.
2970 S. Columbus Street, Suite 1B
25 Arlington, VA 22206

1 APPEARANCES: (continued)
2 On behalf of ADVO, Incorporated; and the
3 Saturation Mail Coalition:
4 JOHN M. BURZIO, ESQ.
5 THOMAS W. McLAUGHLIN, ESQ.
6 Burzio & McLaughlin
7 1054 31st Street, NW, Suite 540
8 Washington, DC 20007
9
10 On behalf of the American Postal Workers Union,
11 AFL-CIO:
12 SUSAN L. CATLER, ESQ.
13 O'Donnell, Schwartz & Anderson, P.C.
14 1300 L Street, NW, Suite 1200
15 Washington, DC 20005
16
17 On behalf of the American Bankers Association:
18 IRVING D. WARDEN, ESQ.
19 1120 Connecticut Avenue, NW
20 Washington, DC 20036
21 On behalf of the Amazon.com:
22 WILLIAM B. BAKER, ESQ.
23 Wiley, Rein & Fielding
24 1776 K Street, NW, Suite 1100
25 Washington, DC 20006
26
27 On behalf of the Association of American
28 Publishers:
29 MARK PELESH, ESQ.
30 JOHN PRZYPYSZNY, ESQ.
31 Drinker, Biddle & Reath, LLP
32 1500 K Street, NW, Suite 1100
33 Washington, DC 20005
34
35 On behalf of the Alliance of Nonprofit Mailers;
36 American Library Association:
37 DAVID M. LEVY, ESQ.
38 CHRISTOPHER T. SHENK, ESQ.
39 Sidley & Austin
40 1722 Eye Street, NW
41 Washington, DC 20006
42
43 On behalf of the McGraw-Hill Companies,
44 Incorporated:
45 TIMOTHY W. BERGIN, ESQ.
46 Squire, Sanders & Dempsey, LLP
47 P.O. Box 407
48 Washington, DC 20044
49

1 APPEARANCES: (continued)

2 On behalf of the American Business Press:

3 DAVID STRAUS, ESQ.
4 MERCIA ARNOLD, ESQ.

5 Thompson, Coburn
6 700 14th Street, NW, Suite 900
7 Washington, DC 20005

8 On behalf of the Florida Gift Fruit Shippers
9 Association:

10 MAXWELL W. WELLS, JR., ESQ.
11 Maxwell W. Wells, Jr., PA
12 14 E. Washington Street, Suite 600
13 Orlando, FL 32802

14 On behalf of the Association for Postal Commerce;
15 Pitney-Bowes and the Recording Industry
16 Association; R.R. Donnelly & Sons Company:

17 IAN D. VOLNER, ESQ.
18 FRANK WIGGINS, ESQ.
19 HEATHER McDOWELL, ESQ.
20 Venable, Baetjer, Howard & Civiletti
21 1201 New York Avenue
22 Washington, D.C. 20005

23 On behalf of the Direct Marketing Association:

24 DANA T. ACKERLY, ESQ.
25 Covington & Burling
1201 Pennsylvania Avenue, NW
Washington, D.C. 20004

On behalf of Time Warner, Inc.:

JOHN M. BURZIO, ESQ.
TIMOTHY L. KEEGAN, ESQ.
Burzio & McLaughlin
1054 31st Street, NW, Suite 540
Washington, DC 20007

On behalf of ValPak Direct Marketing Systems,
Inc.; ValPak Dealers Association, Inc.; Carol
Wright Promotions, Inc.; Association of Priority
Mail Users, Inc.; District Photo, Inc.; Cox
Sampling; and Mystic Color Lab:

WILLIAM J. OLSON, ESQ.
JOHN S. MILES, ESQ.
William J. Olson, PC
8180 Greensboro Drive, Suite 1070
McLean, VA 22102

1 APPEARANCES: (continued)
2 On behalf of the United Parcel Service:
3 JOHN E. MCKEEVER, ESQ.
4 Piper, Marbury, Rudnick & Wolfe, LLP
5 3400 Two Logan Square
6 18th & Arch Streets
7 Philadelphia, PA 19103

8 On behalf of the Dow Jones & Company, Inc.:
9 MICHAEL F. McBRIDE, ESQ.
10 BRUCE W. NEELY, ESQ.
11 JOSEPH FAGAN, ESQ.
12 LeBoeuf, Lamb, Greene & MacCrae, LLP
13 1875 Connecticut Avenue, NW, Suite 1200
14 Washington, DC 20009

15 On behalf of the Parcel Shippers Association; and
16 E-Stamp Corporation:
17 TIMOTHY J. MAY, ESQ.
18 Patton Boggs, LLP
19 2550 M Street, NW
20 Washington, D.C. 20037

21 On behalf of Stamps.com:
22 DAVID P. HENDEL, ESQ.
23 Wickwire Gavin, P.C.
24 8100 Boone Boulevard, Suite 700
25 Vienna, VA 22182

26 On behalf of the National Newspaper Association;
27 and the Professional Football Publication
28 Association:
29 TONDA F. RUSH, ESQ.
30 King & Ballou
31 6054 N. 21st Street
32 Arlington, VA 22205

33 On behalf of Key Span Energy; Long Island Power
34 Authority; and Major Mailers Association:
35 MICHAEL W. HALL, ESQ.
36 34693 Bloomfield Avenue
37 Round Hill, VA 20141

38 On behalf of the Mail Advertising Services
39 Association International; and Smart Mail, Inc.:
40 GRAEME W. BUSH, ESQ.
41 Zuckerman, Spader, Goldstein, Taylor & Kolken, LLP
42 1201 Connecticut Avenue, NW
43 Washington, DC 20036

1 APPEARANCES: (continued)

2 On behalf of the Coalition for Religious Press

3 Associations:

4 JOHN STAPERT, ESQ.

5 1215 17th Street, NW

6 Washington, D.C. 20036

7 STEPHEN FELDMAN, ESQ.

8 Law Offices of Stephen M. Feldman

9 601 Pennsylvania Avenue, NW

10 Building SJE 900

11 Washington, D.C. 20004

12 On behalf of the Magazine Publishers of America:

13 JAMES CREGAN, ESQ.

14 ANNE NOBLE, ESQ.

15 Magazine Publishers of America

16 Suite 610

17 1211 Connecticut Avenue, NW

18 Washington, D.C. 20036

19 On behalf of the Mail Order Association of
20 America:

21 DAVID TODD, ESQ.

22 Patton Boggs L.L.P

23 2550 M Street, NW

24 Washington, D.C.

25 On behalf of Continuity Shippers Association:

AARON C. HOROWITZ, ESQ.

Cosmetique

200 Corporate Woods Parkway

Vernon Hills, Illinois 60061

ANN RILEY & ASSOCIATES, LTD.

Court Reporters

1025 Connecticut Avenue, NW, Suite 1014

Washington, D.C. 20036

(202) 842-0034

1 C O N T E N T S

2	WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
3	DONALD M. BARON				
	BY MR. COOPER	7074			
	BY MR. MCLAUGHLIN		7224/7335/7350		
4	BY MR. BAKER		7273		
	BY MR. COSTICH		7281		
5	BY MR. MCKEEVER		7322		
	LLOYD RAYMOND				
6	BY MR. COOPER	7354			
	BY MR. MCLAUGHLIN		7886		

7

8

9	DOCUMENTS TRANSCRIBED INTO THE RECORD:	PAGE
9	Designated Written Cross-Examination of Donald M. Baron, USPS-T-12	7076
10	ADVO-XE-T12-1	7238
	UPS-XE-Baron-1	7348
11	Designated Written Cross Examination of Lloyd Raymond, USPS-T-13	7359
12	Additional Designated Written Cross Examination of Lloyd Raymond, Advo/USPS-T-13-51, 101, 103; 105 through 109; and MPA/USPS-T-13-7 and 56	7887

14

15

E X H I B I T S

16	EXHIBITS AND/OR TESTIMONY	IDENTIFIED	RECEIVED
17	Direct Testimony of Donald M. Baron, USPS-T-12	7075	7075
18	Library References I-157, I-158 and I-159	7075	7075
19	Designated Written Cross-Examination of Donald M. Baron, USPS-T-12	7076	7076
	ADVO-XE-T12-1	7236	7238
20	ADVO-XE-T12-2	7252	
	UPS-XE-Baron-1	7328	
21	Direct Testimony of Lloyd Raymond, USPS-T-13, subject to stipulations and pending motions to strike	7356	7356
22	Library Reference I-163, subject to pending stipulations and motions to strike	7357	7357
23	Designated Written Cross Examination of Lloyd Raymond, USPS-T-13	7359	7359

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

E X H I B I T S [cont.]

EXHIBITS AND/OR TESTIMONY	IDENTIFIED	RECEIVED
Additional Designated Written Cross Examination of Lloyd Raymond, Advo/USPS-T-13-51, 101, 103; 105 through 109; and MPA/USPS-T-13-7 and 56	7887	7887
ADVO-XE-T-13-1	7990	

P R O C E E D I N G S

[9:35 a.m.]

1
2
3 CHAIRMAN GLEIMAN: Good morning. Today we
4 continue our hearings to receive testimony of Postal Service
5 witnesses in support of Docket R2000-1.

6 I have a few not so brief procedural matters to
7 discuss before we begin to take testimony today.

8 Yesterday, 13 participants joined in filing an
9 objection to the admission into evidence of certain portions
10 of the testimony of witnesses Baron and Raymond.

11 Those parties are: Advo, Inc.; the Alliance of
12 Nonprofit Mailers; American Business Press; the Association
13 for Postal Commerce; the Coalition of Religious Press
14 Associations; the Direct Marketing Association, Inc.; Dow
15 Jones and Company, Inc.; the Magazine Publishers of America,
16 Inc.; Mail Order Association of America; the National
17 Newspaper Association; the McGraw Hill Companies, Inc.; the
18 Parcel Shippers Association; and Time Warner, Inc.

19 These participants asked that any ruling on their
20 objection be deferred until the responses to outstanding
21 discovery requests are complete.

22 The document does not specifically request that
23 oral cross examination be deferred, or that today's hearing
24 be cancelled.

25 Is there a spokesperson for the participants

1 joining in this objection who is prepared to speak to their
2 preference on how the Commission should proceed?

3 MR. McLAUGHLIN: Mr. Chairman, Tom McLaughlin,
4 representing Advo. I'm not sure I am a spokesman on behalf
5 of that group. Advo is a signatory on that.

6 I'm not quite sure what you're suggesting.

7 CHAIRMAN GLEIMAN: Well, you're here today, and I
8 assume you're prepared for cross examination, so you may
9 wish to go ahead. I was just wondering, basically, since
10 the motion was silent on the issue of whether we should
11 proceed today or not, whether there any strong feelings one
12 way or the other.

13 MR. McLAUGHLIN: Well, Mr. Chairman, I think that
14 we should proceed today. I might point out that I think
15 it's going to be a very problematic situation when we have a
16 very large number of interrogatories that, despite the extra
17 week that's been granted to hold this hearing, are still
18 outstanding and unanswered.

19 Many of those, by the way, are 30 or 40 days
20 overdue. They were asked back in March.

21 So I think that cross examination with respect to
22 outstanding interrogatories may be problematic.

23 There obviously are a lot of interrogatories that
24 have been responded to, many of them very, very late, but at
25 least we have responses.

1 And we are prepared to cross examine with respect
2 to those aspects. So I think the answer is perhaps a
3 partial answer; yes, we're going to try to do what we can
4 today in cross examination, but I don't believe that we can
5 possibly go through 50 outstanding interrogatories through
6 cross examination.

7 CHAIRMAN GLEIMAN: I appreciate that. Does the
8 Postal Service or any other participant have anything they'd
9 wish to add at this point?

10 MR. COOPER: Mr. Chairman, Rick Cooper for the
11 Postal Service. As you know, we did not oppose the motion
12 to extend or postpone the hearing one week, and we're doing
13 everything in our power to both respond to outstanding
14 interrogatories and to accommodate the needs of the
15 interested parties, including offering them informal access
16 in the past to the underlying records and working directly
17 with counsel on many occasions, arranging for quick delivery
18 of responses, and giving them heads-up as to what's coming.

19 We are prepared to continue doing that, and we
20 think it would be best to proceed today. And the cross
21 examination today will enable the parties yet another
22 opportunity to explore this material.

23 MR. McLAUGHLIN: Mr. Chairman, if I might just
24 comment on that: I would say that I would certainly agree
25 that Mr. Cooper has tried to accommodate us whenever he

1 could. The problem is not getting answers is not getting
2 answers. That's a serious problem.

3 Mr. Cooper also mentioned -- I'm not sure whether
4 this is the appropriate time to discuss, basically, the
5 status of outstanding interrogatories or whether we should
6 wait till Mr. Raymond takes the stand.

7 It's really up to you. We can discuss that now,
8 or we can wait until Mr. Raymond is on the stand.

9 CHAIRMAN GLEIMAN: I would just as soon discuss
10 that at this point.

11 MR. McLAUGHLIN: Okay. There are, as we
12 mentioned, a large number of outstanding interrogatories.
13 Some of these -- all of them, we believe, are important and
14 pertinent to the witness's testimony, to understanding it
15 and evaluating it.

16 There are some, in particular, that are -- that
17 really request data, information concerning the database
18 that have been pending since March 15th, or as almost all of
19 them, sometime in March.

20 Some of those are now 40 days overdue; that's 54
21 or 55 days since we filed the interrogatories. For example,
22 Advo Interrogatory 38 to Witness Raymond asked to get a
23 refiled database that identified observer codes for each
24 route they observed.

25 We still do not have that. And, Mr. Chairman, if

1 we receive that today, as you know, it's one thing to
2 receive a new database; it's another thing to be able to
3 analyze it, do runs on it, check it out different ways in
4 order to prepare for rebuttal testimony.

5 There is also -- I'm just picking out here, a
6 couple of the interrogatories. I don't mean to suggest that
7 others are not important.

8 Advo Interrogatory 102 asked for -- that was filed
9 on March R. I believe that was the last day for regular
10 discovery.

11 That asked for additional information from the ESW
12 that was collected at the same time, and, in fact, in the
13 same general larger database concerning the routes that are
14 in Library Reference 163.

15 That interrogatory response is now 33 days late.
16 Again, Mr. Chairman, if receive that today, it would -- I
17 can't imagine how we would analyze that in time for rebuttal
18 testimony.

19 One other important one that I would like to
20 mention is actually an institutional interrogatory.
21 Advo/USPS-11 requests videotapes that were taken during the
22 data collections which are the subject of Mr. Raymond's
23 testimony.

24 Mr. Cooper mentioned that the Postal Service did
25 allow some informal access to Advo and NPA representatives

1 at Merrifield to view additional documentation.

2 In fact, we were allowed three days to review -- I
3 should say, perhaps, to scan -- videotapes. We were then
4 told that no more access would be granted to view those
5 videotapes.

6 Shortly after that, we filed Advo Interrogatory
7 11. Obviously, Mr. Chairman, you cannot review and analyze
8 and assess videotapes of a number of different routes in
9 three days. We have had no access now for nearly -- no
10 access to those videotapes for nearly two weeks now.

11 Once we receive those videotapes, it will take
12 some time to be able to go through and analyze those
13 videotapes.

14 So while the Postal Service has in some narrow
15 respects, been cooperative, in a much broader sense, it has
16 not come close to being able to allow us to analyze and
17 assess and rebut what has been presented in this testimony.

18 Now, the Postal Service has suggested at times --
19 well, let me first make a status inquiry from the Postal
20 Service as to what is the status of the outstanding
21 interrogatories?

22 CHAIRMAN GLEIMAN: Mr. Cooper, any sense of where
23 things are at this point?

24 MR. COOPER: Generally, we have been faced with
25 hundreds of interrogatories, as you know. We have taken

1 them out of order on some occasions to answer ones that can
2 be more quickly answered and get them out of the way. Many
3 of the questions are technical and involve analysis of a
4 very large database, so some of those, including the ones
5 that were mentioned, are taking longer. And in the general
6 press of business and in the midst of trying to informally
7 grant access, it has been difficult to keep up with the
8 total number of interrogatories.

9 I can't at this time give you an
10 interrogatory-by-interrogatory status report. Perhaps Mr.
11 Raymond could have a better -- would be able to give you a
12 better notion of where he is at on particular ones.

13 With respect to the videotapes, I think three days
14 was a pretty generous amount of time, myself. The reason we
15 had to cut it off was because we had to get the witness back
16 to answering interrogatories and preparing for his
17 appearance on the stand. We are in the process of procuring
18 videotape equipment so that we can make the many copies
19 necessary to file, I think 40 tapes have been requested.

20 We are going to convert them to VHS format per the
21 request of counsel for Advo, and we are going to make
22 several sets, of course, because they will be filed as a
23 Library Reference. This is going to be a massive
24 undertaking. We are procuring the equipment to do that, and
25 we will begin production shortly.

1 Also, in conjunction with that interrogatory, Advo
2 has asked for a lot of underlying hard copy documentation.
3 We think it is going to be in the tens of thousands of
4 pages. We are going to also be producing Library References
5 of those. These things take time. We are moving with all
6 diligence to produce the material.

7 CHAIRMAN GLEIMAN: Mr. McLaughlin.

8 MR. McLAUGHLIN: Mr. Chairman, it is correct that,
9 in conjunction with the videotapes, we asked for some
10 specified additional documentation, including, for example,
11 some forms that the Postal Service used during the data
12 collection. I am stunned to hear that we are talking about
13 tens of thousands of documents and pages.

14 In the interrogatory, I believe, if not in the
15 interrogatory itself, I have since conveyed to counsel that
16 if there is some way to narrow that information, we should
17 discuss it and try to narrow it. I simply can't believe
18 that we have to deal with tens of thousands of documents at
19 this point. And I have not received any communication from
20 Mr. Cooper since we filed the interrogatory suggesting that
21 we were dealing tens of thousands of documents, or that
22 there wasn't some way to specifically narrow it. I believe
23 there is a way to specifically narrow that, but I have had
24 no communication from the Postal Service concerning that.

25 I would also like to comment on the suggestion

1 that has been made repeatedly, and it has been the excuse
2 every time the Postal Service has filed a late response,
3 about the large amount of discovery that has been filed in
4 this case on this witness. I think the record should be
5 clear that that large amount of discovery cannot be blamed
6 on the intervenors. Obviously, we filed them, but I think
7 it has to be taken in perspective.

8 First of all, this testimony was not ready to be
9 filed when it was filed. It was lacking incredible amounts
10 of documentation that should have been filed day one, were
11 not filed. A number of the interrogatories, especially the
12 early ones, were directed at getting that underlying
13 documentation that should have been available from day one.

14 Secondly, the Postal Service conceded that the
15 documentation it had underlying this testimony was in a
16 state of disarray, it was scattered, apparently in a
17 disorganized manner, out at a building in Merrifield, and
18 had not been cataloged and sorted. Mr. Chairman, as you
19 recall, the Postal Service had to go through a substantial
20 effort, probably the witness, simply to organize the files
21 that should have been organized and ready to go the day this
22 case was filed.

23 Now, that obviously put Mr. Raymond behind in
24 terms of answering the responses. The problem we have here
25 is we have a 10 month deadline for considering proceedings.

1 A party presenting testimony in the case must be prepared at
2 the outset to have the documentation it needs in order to
3 allow parties effective discovery and effective analysis.
4 We did not have that here.

5 Third, the witness' have been incredibly late and
6 in many cases by four or five weeks. That has further
7 hampered discovery.

8 And, fourth, as we will get into later on, many of
9 the witness' answers have been non-responsive, incorrect,
10 or, in fact, have led to believe something that we have
11 found out later on was different than what was originally
12 said. That also has led to complications in discovery.

13 CHAIRMAN GLEIMAN: Mr. McLaughlin, Mr. Cooper, I
14 appreciate your comments, and I certainly understand both
15 points of view. This is a complicated process that involves
16 a great deal of technical data, and a great deal of other
17 people's money that is at stake here. And it is important
18 that we get as much good information into the record in a
19 timely manner as we possibly can. And I am well aware of
20 the 10 month clock that we work against.

21 It is my intention, after taking a little bit of
22 beating at the front end of the process when I put together
23 a schedule that would have gotten us out of here in nine
24 months, to at least make the 10 month deadline. It may
25 require a little bit of adjusting here in there in our

1 hearing schedules, and perhaps recalling witnesses and
2 giving leave to parties to file materials, evidentiary
3 materials later than might otherwise be the case.

4 But right now I think that we will defer on the
5 motion that contained the objection. We will receive the
6 evidence today from Witnesses Baron and Raymond, subject to
7 the objection that was filed yesterday, and we will proceed
8 with cross-examination to the extent we can.

9 When the Service believes that it has responded
10 fully to outstanding discovery requests, I expect to file a
11 notice to that effect with the Commission. Participants
12 will then have 14 days to perfect a motion to strike,
13 identifying both testimony and associated cross-examination
14 that they seek to exclude from the evidentiary record. And
15 after that 14 day period, when we hear from the intervenors,
16 the Postal Service will have seven days to respond to any
17 motion to strike that is filed by intervenors.

18 And if parties who filed the objection last night
19 believe that their rights have been irreparably harmed by
20 the delay in obtaining responsive answers, they may at any
21 time, of course, file an appropriate motion requesting
22 additional or alternative relief. And as I said earlier on,
23 we will, to the best of our ability to do so, accommodate
24 parties with respect to the need to file evidence late, to
25 give them ample opportunity to examine materials that are

1 provided in response to interrogatories.

2 Yes, sir.

3 MR. McLAUGHLIN: May I just clarify what you are
4 saying. You are saying, in other words, that after the
5 Postal Service has finally completed responding to all of
6 the interrogatories and discovery requests, that 14 days
7 after that, a motion to strike would be --

8 CHAIRMAN GLEIMAN: In order.

9 MR. McLAUGHLIN: In order.

10 CHAIRMAN GLEIMAN: Yes.

11 MR. McLAUGHLIN: Mr. Chairman, I perceive some
12 potential problems with that. Number one, we don't know
13 when that kickoff point is going to come at this point. It
14 could be -- it is not going to be tomorrow, we know that.
15 It is an indefinite time. There has been a time, a
16 reschedule time set for filing rebuttal testimony to this
17 testimony. That is obviously going to be in a shambles.

18 The other problem, Mr. Chairman, is that beginning
19 on May 22nd, all other intervenors will be filing testimony
20 on all sorts of other issues in this case. Under the normal
21 schedule established by you earlier on in this case, the
22 schedule that we are all adhering to, the attorneys and the
23 witnesses who are involved on this issue are also going to
24 be involved on a lot of other issues going on at the same
25 time.

1 Delaying, further delaying this aspect can have a
2 prejudicial effect with respect to our ability to
3 participate on other issues in the case that are being
4 raised by other intervenors, and that is no small matter.

5 This is not the only issue that we have going on.
6 We had been assuming that the Postal Service's case would be
7 completed by this time, so that we could then turn our
8 attention to intervenors' testimony. Going through this
9 procedure could end up having our resources locked up on
10 this issue during a time when other issues are being
11 litigated in the case, and that itself is prejudicial.

12 I am not sure I have a solution to that right now.
13 I am simply raising it with you as to the problems that are
14 being created by the situation we are in now.

15 MR. COOPER: Mr. Chairman?

16 CHAIRMAN GLEIMAN: Mr. Cooper.

17 MR. COOPER: Mr. Chairman, unless my eyes deceive
18 me, the procedure that you are proposing was suggested by
19 the objectors themselves. I quote: "We ask that any ruling
20 on this objection be deferred until responses to outstanding
21 discovery requests are completed."

22 CHAIRMAN GLEIMAN: I understand, Mr. Cooper, but I
23 also understand what Mr. McLaughlin is saying. Just as you
24 indicated earlier on that three days was not an unreasonable
25 amount of time and that the Postal Service has had to jockey

1 around with lots of interrogatories that have been thrown at
2 them, the need was to get the witness back so that the
3 witness could respond to interrogatories and prepare for a
4 hearing.

5 You know, those same competing pressures exist for
6 the Intervenors in the case and ultimately somewhere down
7 the line will fall on the shoulders of the Commission staff
8 and the Commissioners, so I appreciate your comment. I
9 certainly understand what you said before about the
10 pressures that you have been under, and I understand quite
11 well the pressures that Mr. McLaughlin is speaking to.

12 All I can say, Mr. McLaughlin, is -- and you
13 indicated that you didn't have any special relief you were
14 asking for at this particular time -- is to assure you that
15 the Presiding Officer and the Commission have taken notice
16 of the concerns you expressed. We are going to make every
17 effort to accommodate the Intervenors in the case to ensure
18 that to the greatest degree possible that their positions
19 are not prejudiced in this case and, as I indicated a few
20 moments ago, we will entertain requests for relief by
21 specific parties above and beyond the issue of how we treat
22 the testimony that we are going to receive today and that is
23 going to be perhaps the subject of a motion to strike.

24 I would like to think that the Postal Service will
25 move ahead maybe a little bit more quickly than they might

1 otherwise have been able to. We are coming up on the end of
2 these hearings, and that ought to free up some resources for
3 the Postal Service to move ahead and get outstanding
4 interrogatories responded to, and I would prefer that the
5 material come in quickly, but in dribs and drabs is better
6 than waiting, you know, until every last one is prepared and
7 then unloading them all, and I would like to think that in a
8 good faith effort to comply the Postal Service will respond
9 to individual interrogatories and requests for documents and
10 other materials as promptly as they can and not hold back as
11 part of a litigation strategy to prejudice the position of
12 an Intervenor.

13 I am convinced the Postal Service would not do
14 that and I am sure you would agree that they wouldn't play
15 litigation strategy games. If there is any indication that
16 they are doing so, ultimately the pressure will be on the
17 Postal Service in the final analysis because we do have to
18 get the case out, unless of course we assert our authority
19 to issue a C-2 order pursuant to the Postal Service not
20 complying with some lawful Commission order. I don't know
21 how one might interpret what a lawful Commission order is.
22 You can interpret it narrowly or broadly but, bottom line,
23 we are going to do everything that we can to ensure that
24 parties are not prejudiced in the final analysis.

25 Now to the next knotty little situation. Two

1 parties, United Parcel Service and ADVO, filed separate
2 notices of intention to cross examine our second witness
3 today who has been the subject matter of most of the
4 discussion so far, Witness Raymond, on materials that have
5 been filed subject to protective conditions.

6 Now let me go over how we will proceed today if it
7 comes to that.

8 Questions relating to materials filed under
9 protective conditions are to be deferred. After we have
10 completed oral cross examination including any questions
11 from the bench and redirect to Witness Raymond we will take
12 a break prior to allowing cross examination on protected
13 materials. In order to participate during the phase of the
14 hearing that deals with protected materials, counsel,
15 advisors, and other interested parties in attendance will
16 have to have committed to the protective conditions
17 applicable to the material submitted by Witness Raymond.
18 That means you have to have signed on the dotted line. A
19 portion of today's hearings concerning the protected
20 materials will be reported in a separate volume of the
21 transcript which will also be subject to protective
22 conditions.

23 Now anyone who wants to participate, if and when
24 we get to that point later on today, in the closed hearing
25 is going to have to, as I indicated, signed a protective

1 conditions agreement and if you have not done so and you
2 feel you want to be present for the hearing during one of
3 the breaks today you should go to the docket room and
4 indicate to the people in the docket room that you are
5 interested in signing the protective conditions established
6 in Presiding Officer's Ruling Number 27.

7 Any questions?

8 [No response.]

9 CHAIRMAN GLEIMAN: The next matter I want to raise
10 is a pending dispute concerning information used to develop
11 the Bulk RPW report.

12 On Friday evening the Postal Service filed a
13 pleading objecting to certain discovery requests and
14 responding to two motions to compel previously filed by
15 United Parcel Service. By my count there are four separate
16 motions to compel from UPS and another motion that may or
17 may not have been rendered moot by what was filed last
18 Friday night that was earlier filed by the National
19 Newspaper Association.

20 All of these concern the broad topic of access to
21 data underlying the Bulk RPW report.

22 Friday's Postal Service response provided the best
23 description we have obtained so far in how mailing statement
24 data is accumulated and combined into the Bulk RPW report.
25 The Postal Service included within its response several

1 suggestions of ways to resolve the current conflict.

2 I know that counsel have been diligent in working
3 to develop a satisfactory way to allow Intervenors to
4 exercise their due process rights without violating the
5 Postal Service's need to protect specific information.

6 Nonetheless, I am going to ask counsel for the
7 Postal Service and United Parcel Service and the Newspaper
8 Association, if they are present today, to review the
9 situation once again in light of the materials that were
10 filed by the Postal Service on Friday and be prepared to
11 report to me after the lunch break on whether any
12 outstanding conflicts can be resolved informally.

13 Does any participant have another matter they wish
14 to raise this morning? Even an easy one, please? We could
15 use a softball at this point. If not, then we will proceed
16 with the scheduled witnesses who are Witnesses Baron and
17 Raymond.

18 Mr. Cooper, if you are prepared to introduce your
19 first witness, we will proceed.

20 MR. COOPER: Yes, sir. The Postal Service calls
21 Donald M. Baron to the stand.

22 Whereupon,

23 DONALD M. BARON,
24 a witness, having been called for examination and, having
25 been first duly sworn, was examined and testified as

1 follows:

2 DIRECT EXAMINATION

3 BY MR. COOPER:

4 Q Mr. Baron, I am about to hand you two copies of a
5 document entitled "Direct Testimony of Donald M. Baron on
6 Behalf of the United States Postal Service," marked as
7 USPS-T-12. Are you familiar with this document?

8 A Yes.

9 Q Was it prepared by you or under your direct
10 supervision?

11 A It was.

12 Q If you were to be giving testimony orally today,
13 is this the testimony that you would give?

14 A It is.

15 MR. COOPER: Mr. Chairman, I will collect those
16 copies and hand them to the reporter, asking that they be
17 admitted into evidence.

18 CHAIRMAN GLEIMAN: Is there any objection? Other
19 than the outstanding objection that was mentioned earlier.

20 [No response.]

21 CHAIRMAN GLEIMAN: If not, I will direct that
22 counsel provide the reporter with two copies of the direct
23 testimony of Witness Baron, and the testimony is received
24 into evidence. As is our practice, it will not be
25 transcribed into the record. And it is being received

1 subject to the aforementioned objection and motion by
2 several parties.

3 [Direct Testimony of Donald M.
4 Baron, USPS-T-12, was received into
5 evidence.]

6 CHAIRMAN GLEIMAN: Mr. Cooper, is Witness Baron
7 sponsoring any Category 2 Library References?

8 MR. COOPER: Yes, sir. And I will go through that
9 procedure now.

10 BY MR. COOPER:

11 Q Mr. Baron, with respect to Library References
12 I-157, 158 and 159, are those Library References associated
13 with your testimony, and are you prepared to sponsor them?

14 A Yes.

15 CHAIRMAN GLEIMAN: That being the case, the
16 Library References in question will be entered into evidence
17 and not transcribed into the record.

18 [Library References I-157, I-158
19 and I-159 were received into
20 evidence.]

21 CHAIRMAN GLEIMAN: Mr. Baron, have you had an
22 opportunity to examine the packet of designated written
23 cross-examination that was made available earlier today?

24 THE WITNESS: I have.

25 CHAIRMAN GLEIMAN: And if those questions were

1 asked of you today, would your answers be the same as those
2 you previously provided in writing?

3 THE WITNESS: They would.

4 CHAIRMAN GLEIMAN: That being the case, counsel,
5 if you would please provide two copies of the designated
6 written cross-examination of the witness to the reporter.

7 MR. COOPER: Mr. Chairman, I think the witness may
8 have been a bit hasty there. I believe that late last night
9 he made known to me a change he wanted to make to one
10 footnote.

11 CHAIRMAN GLEIMAN: Well, in that case, Mr. Baron,
12 if you did make the change, and if it is included in the
13 packet, if you could please let us know what that is.

14 THE WITNESS: Yes. I apologize for that
15 oversight. It is page 5 of Advo 23(a). The correction has
16 been to delete the last two sentences of footnote number 1.

17 CHAIRMAN GLEIMAN: And has that change been
18 incorporated into the package?

19 MR. COOPER: Yes, sir.

20 CHAIRMAN GLEIMAN: That being the case, the
21 corrected designated written cross-examination of the
22 witness is received into evidence and transcribed into the
23 record.

24 [Designation of Written

25 Cross-Examination of Donald M. .

1 Baron, USPS-T-12, was received into
2 evidence and transcribed into the
3 record.]
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ANN RILEY & ASSOCIATES, LTD.
Court Reporters
1025 Connecticut Avenue, NW, Suite 1014
Washington, D.C. 20036
(202) 842-0034

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

DESIGNATION OF WRITTEN CROSS-EXAMINATION
OF UNITED STATES POSTAL SERVICE
WITNESS DONALD M. BARON
(USPS-T-12)

Party

Advo, Inc. and
Magazine Publishers of America

Interrogatories

ADVO/USPS-T12-1-5, 11-15
MPA/USPS-T12-1-2, 4, 6, 18-21, 26-31
MPA/USPS-T10-21, 23 redirected to T12
OCA/USPS-T12-5, 11-13
UPS/USPS-T12-7

Newspaper Association of America

ADVO/USPS-T12-3-5, 8-10, 12-14
ADVO/USPS-T13-23a, c redirected to T12
MPA/USPS-T12-2, 8-10, 12-16, 18-20, 24-25,
28-30, 37-40
MPA/USPS-T10-21, 23 redirected to T12
NAA/USPS-T12-1, 6-7
NAA/USPS-T10-21, 22d redirected to T12
OCA/USPS-T12-1, 6-7, 10, 12
UPS/USPS-T12-2, 4, 11

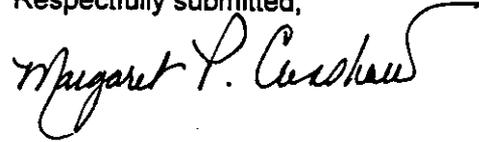
Office of the Consumer Advocate

ADVO/USPS-T12-16-17, 19
ADVO/USPS-T13-23a, c redirected to T12
OCA/USPS-T12-1-4, 6-12, 14-17

United Parcel Service

ADVO/USPS-T12-12-13, 15
MPA/USPS-T12-6, 37, 40
MPA/USPS-T10-21-23 redirected to T12
NAA/USPS-T10-22d redirected to T12
OCA/USPS-T12-11-12, 17
UPS/USPS-T12-7

Respectfully submitted,



Margaret P. Crenshaw

INTERROGATORY RESPONSES OF
UNITED STATES POSTAL SERVICE
WITNESS DONALD M. BARON (T-12)
DESIGNATED AS WRITTEN CROSS-EXAMINATION

Interrogatory:

ADVO/USPS-T12-1
ADVO/USPS-T12-2
ADVO/USPS-T12-3
ADVO/USPS-T12-4
ADVO/USPS-T12-5
ADVO/USPS-T12-8
ADVO/USPS-T12-9
ADVO/USPS-T12-10
ADVO/USPS-T12-11
ADVO/USPS-T12-12
ADVO/USPS-T12-13
ADVO/USPS-T12-14
ADVO/USPS-T12-15
ADVO/USPS-T12-16
ADVO/USPS-T12-17
ADVO/USPS-T12-19
ADVO/USPS-T13-23a redirected to T12
ADVO/USPS-T13-23c redirected to T12
MPA/USPS-T12-1
MPA/USPS-T12-2
MPA/USPS-T12-4
MPA/USPS-T12-6
MPA/USPS-T12-8
MPA/USPS-T12-9
MPA/USPS-T12-10
MPA/USPS-T12-12
MPA/USPS-T12-13
MPA/USPS-T12-14
MPA/USPS-T12-15
MPA/USPS-T12-16
MPA/USPS-T12-18
MPA/USPS-T12-19
MPA/USPS-T12-20

Designating Parties:

Advo&MPA
Advo&MPA
Advo&MPA, NAA
Advo&MPA, NAA
Advo&MPA, NAA
NAA
NAA
NAA
Advo&MPA
Advo&MPA, NAA, UPS
Advo&MPA, NAA, UPS
Advo&MPA, NAA
Advo&MPA, UPS
OCA
OCA
OCA
NAA, OCA
NAA, OCA
Advo&MPA
Advo&MPA, NAA
Advo&MPA
Advo&MPA, UPS
NAA
NAA
NAA
NAA
NAA
NAA
NAA
Advo&MPA, NAA
Advo&MPA, NAA
Advo&MPA, NAA

MPA/USPS-T12-21	Advo&MPA
MPA/USPS-T12-24	NAA
MPA/USPS-T12-25	NAA
MPA/USPS-T12-26	Advo&MPA
MPA/USPS-T12-27	Advo&MPA
MPA/USPS-T12-28	Advo&MPA, NAA
MPA/USPS-T12-29	Advo&MPA, NAA
MPA/USPS-T12-30	Advo&MPA, NAA
MPA/USPS-T12-31	Advo&MPA
MPA/USPS-T12-37	NAA, UPS
MPA/USPS-T12-38	NAA
MPA/USPS-T12-39	NAA
MPA/USPS-T12-40	NAA, UPS
MPA/USPS-T10-21 redirected to T12	Advo&MPA, NAA, UPS
MPA/USPS-T10-22 redirected to T12	UPS
MPA/USPS-T10-23 redirected to T12	Advo&MPA, NAA, UPS
NAA/USPS-T12-1	NAA
NAA/USPS-T12-6	NAA
NAA/USPS-T12-7	NAA
NAA/USPS-T10-21 redirected to T12	NAA
NAA/USPS-T10-22d redirected to T12	NAA, UPS
OCA/USPS-T12-1	NAA, OCA
OCA/USPS-T12-2	OCA
OCA/USPS-T12-3	OCA
OCA/USPS-T12-4	OCA
OCA/USPS-T12-5	Advo&MPA
OCA/USPS-T12-6	NAA, OCA
OCA/USPS-T12-7	NAA, OCA
OCA/USPS-T12-8	OCA
OCA/USPS-T12-9	OCA
OCA/USPS-T12-10	NAA, OCA
OCA/USPS-T12-11	Advo&MPA, OCA, UPS
OCA/USPS-T12-12	Advo&MPA, NAA, OCA, UPS
OCA/USPS-T12-13	Advo&MPA
OCA/USPS-T12-14	OCA
OCA/USPS-T12-15	OCA
OCA/USPS-T12-16	OCA
OCA/USPS-T12-17	OCA, UPS
UPS/USPS-T12-2	NAA

UPS/USPS-T12-4
UPS/USPS-T12-7
UPS/USPS-T12-11

NAA
Advo&MPA, UPS
NAA

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-T12-1. With respect to the FY98 accrued activity time proportions developed in LR I-159 from the Engineered Standards (ES) data collection, please provide any information you have on the following:

- (a) Statistical measures of accuracy or reliability available on the estimates of annual proportions of accrued activity time for each route sampled.
- (b) Statistical measures of accuracy or reliability available on the estimates of the annual proportions of accrued activity time for each route type for each zip sampled.
- (c) Statistical measures of accuracy or reliability available on the estimates of the annual proportions of accrued activity time for each route type for each region sampled.
- (d) Statistical measures of accuracy or reliability available on the estimates of the annual proportions of accrued activity time for each route type for the USPS city carrier system in its entirety.

RESPONSE:

- (a) through (d). I have not produced any statistical measures of accuracy or reliability.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-2. With respect to the FY98 accrued activity time proportions developed in LR-I-159 from the Engineered Standards (ES) data collection, did you, in any way, attempt to quantitatively validate these proportions with data from other sources? If so, please explain fully, and provide your analyses and results.

RESPONSE:

No.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-T12-3. On page 31 of your testimony, you provide explanations for the terms Loading, Driving, Route-Access (FAT), Route-Access (CAT), and Collection Activity Categories. Prior to performing your analysis and submitting your testimony, did you review the Engineered Standards data set and attempt to:

- (a) Ensure that the Engineered Standards tally assignments to those activities matched precisely your definitions? If so, please explain what you did, and identify any concerns you may have with respect to the precise matching of any Engineered Standards tally (or set of tallies) with your ratemaking definitions.
- (b) Check Mr. Raymond's assignments to various activity times in order to determine whether they were consistently applied? If so, please explain fully and identify any concerns you may have with respect to consistency of application.
- (c) Ensure that the definitions applied to the Engineered Standards data (and the times that were ascribed to them) correctly matched the ones used in the FAT, CAT, and LTV data collections? If so, please explain them.

RESPONSE:

(a) I did conduct such a review. I communicated to Mr. Raymond the definitions of the six street activity categories: load time, driving time, street support, route/access FAT, route/access CAT, and collection box. I observed that these definitions are the ones summarized in the "Cost Segment 7" section of what is now Docket R2000-1, USPS LR-I-1, Postal Service's Summary Description of USPS Development of Costs By Segments And Components, FY 1998.

The major concerns I discussed with Mr. Raymond were the need to define load time as time that begins only 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 (specifically, as route/access FAT walking time, driving time, or route/access CAT time). In particular, I wanted to ensure that Mr. Raymond would define street-time tallies as load-time tallies only in those instances in which the carrier is physically stopped at a delivery stopping point doing one of the following:

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

- (1) putting mail into a receptacle, or preparing to do so through the handling of mail pieces, bundles, or mail-related equipment (e.g., by fingering mail to get it ready for delivery).
- (2) collecting mail from receptacles.
- (3) obtaining signatures from and communicating with customers in the process of delivering accountable services.

My communications with Mr. Raymond also emphasized that any activity of handling mail or mail-related equipment that occurs at a stopping point other than a customer delivery location should be identified as a street support or route-access FAT activity, not as load time. An example is the handling of mail or mail-related equipment at a vehicle stopping point in preparation for the activity of walking on the loop section of a route.

(b) I did perform such a check. I observed several records in the ES database that showed questionable allocations of tallies to the load-time activity. I questioned Mr. Raymond in particular to verify that the carriers being observed in these instances were correctly identified as being located at a delivery stopping point in the process of either putting mail into receptacles or preparing to do so. I received assurances from Mr. Raymond that this was indeed the case in all such instances.

(c) It is my understanding that the definitions I communicated to Mr. Raymond are consistent with the definitions that had been used in the CATFAT and load time studies.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-4. With regard to the Engineered Standards data set and its use in this rate case:

- (a) Please describe all issues that you discussed with Mr. Raymond and when they were discussed.
- (b) Please provide all written guidance and describe all oral guidance you gave Mr. Raymond on how to ascribe tallies to the Drive, Load, FAT, CAT, Collection, and Street Support categories.
- (c) Please describe the types of Engineered Standards tallies that you assisted Mr. Raymond to identify in terms of Drive, Load, CAT, FAT, Collection, Street Support.

RESPONSE:

- (a) The issues I discussed with Mr. Raymond were the definitions of the street-time activity categories, alternative methods of using data from the ES database to estimate percentages for these categories, and the application of these percentages to the distribution of accrued street-time cost across activities. These discussions were held from March through April 1999, and again from November 1999 through January 2000.
- (b) It is my understanding that all written guidance provided to Mr. Raymond came from USPS staff. The oral guidance I provided Mr. Raymond consisted of review and clarification of the street-time activity definitions to help ensure that Mr. Raymond would accurately assign work-sampling tallies across the six major street-activity categories.
- (c) The types of tallies that I assisted Mr. Raymond in identifying were those that raised questions regarding the relationship between the location and activity of the carrier and the allocation of activity tallies to street-activity categories. My assistance consisted of guidance relating to how the combination of the physical location and the activity conducted by the carrier at the time a tally was being recorded should be interpreted for purposes of allocating the tally to the appropriate activity category.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-5. Did you independently review the Engineered Standards data set, prior to Mr. Raymond's activity category assignments, and attempt to assign them yourself? If so, please explain how many route-days of data you reviewed and whether you had any difficulties in making the assignments.

RESPONSE:

I did independently review the Engineered Standards data set prior to Mr. Raymond's activity category assignments. I reviewed 861 route-days of data. I did not attempt to independently assign tallies to activity categories prior to Mr. Raymond's decisions on these assignments.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-8. In your Appendix A, you quote Dr. Bradley's R90-1 rebuttal testimony: "...evaluation of a cost function at the mean volume level provides, necessarily, an unbiased estimator of the true volume variability." (USPS-RT-2 at 10)

(a) Please confirm that Dr. Bradley also stated:

"What is important, however, is the set of properties determining the cost function estimated for a particular activity and the measurement of the associated marginal cost at an appropriate level of volume. With the goal of the research well defined, it is clear that the researcher must determine the appropriate level of volume for measuring marginal cost." (USPS-RT-2 at 9).

If you cannot confirm, please explain why not

(b) Please confirm that Dr. Bradley also stated:

"Evaluation at the mean level of volume thus guarantees calculation of marginal cost at the best estimate of the average level of volume. As the Commission has stated, this is the volume level relevant for the theory of pricing at marginal cost of the average level of output." (USPS-RT-2 at 11)

If you cannot confirm, please explain why not.

(c) Please confirm that Dr. Bradley's testimony (quoted by you) presented marginal cost as:

$$\partial C / \partial V = \mathcal{E} C / V$$

where $\partial C / \partial V$ (marginal cost) is evaluated from the cost function that includes C as the dependent variable and V as the mean estimate of the independent volume variable (USPS-RT-2 at 9). If you cannot, please explain why not.

(d) Please identify in Dr. Bradley's testimony the location where he states that an unbiased estimate of marginal cost can be derived by applying the variability from a cost function correctly estimated at mean volumes to an average cost that (1) was not developed from the cost function and (2) substantially diverges from the average cost estimated from the cost function (i.e., diverges by far more than can be explained by the Jensen's Inequality phenomenon).

RESPONSE:

(a) Confirmed.

(b) Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

- (c) Not confirmed. There is nothing in Dr. Bradley's testimony that indicates that marginal cost must be calculated at the cost level "C" that you describe as the dependent variable. In fact, the marginal cost (or volume variable cost) is typically calculated at the actual accrued cost for the cost pool. Note that the elasticity is a unit free measure that can be applied to the appropriate accrued cost level.
- (d) Although this issue was not explicitly addressed, one way or the other, in Dr. Bradley's Docket No R90-1 testimony, it is addressed in his Docket No. R2000-1 incremental cost testimony. In particular, see pages 5-8 of USPS-T-22 where Dr. Bradley describes, in mathematical terms, the Commission's method for calculating attributable cost. There he makes clear that the established methodology takes the accrued cost for a cost pool from the Postal Service's accounting system and multiplies it by variabilities (and distribution keys) derived from special studies. He explains that this process is called "calibration."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-9. Please refer to Dr. Bradley's quote that "...evaluation of a cost function at the mean volume level provides, necessarily, an unbiased estimator of the true volume variability". (R90-1, USPSRT2, at 10)

- (a) Please confirm that the per stop load cost function evaluated at average stop volume is the $g(V/S)$ function you use in your testimony. If you cannot confirm, please explain why.
- (b) Using this notation, please confirm that the variability of per stop load time evaluated at the average per stop volume is $(dg(v)/dv)*(v/g(v))$, where $v = V/S$. If you cannot confirm, please explain.
- (c) Please confirm that using Dr. Bradley's criteria, this variability must be an unbiased estimator of true variability. If you cannot confirm, please explain why.
- (d) Please confirm that using Dr. Bradley's criteria, $dg(v)/dv$ must be an unbiased estimator of true marginal cost. If you cannot confirm, please explain why.

RESPONSE:

- (a) Confirmed.
- (b) Not confirmed. The variability formula includes the partial derivative with respect to volume evaluated at mean volume, not the total derivative with respect to average volume per stop as is in your formula.
- (c) Not confirmed due to an erroneous formula.
- (d) Not confirmed due to an erroneous formula.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-10. Please examine equation (5) in page 10 of your testimony.

- (a) Please confirm that dividing by L yields witness Crowder's system wide load time variability: $[(\partial L / \partial V) * (V / L)] = E_e + (1 - E_e) * E_s$. If you cannot confirm, please explain why.
- (b) Please confirm that E_e is elemental load variability, $(dg(v)/dv) * v/g(v)$, evaluated at average stop volume and, therefore, this component value of witness Crowder's total system variability is an unbiased estimator of true variability, using Dr. Bradley's criteria. If you cannot confirm, please explain why.

RESPONSE:

(a) Please note that this "equation" is invalid. As I point out on page 10 of my testimony, equation (5) is derived from Ms. Crowder's equation (4): $L = g(V/S) * S$. My testimony further shows that, in fact, $L = g(V/S) * S$ does not hold. L does not equal $g(V/S) * S$, because $g(V/S)$ is nonlinear. The degree of this nonlinearity is especially large for MDR and BAM. Therefore, the symbol that correctly relates the left-hand side and the right-hand side of what Ms. Crowder calls "equation" (4) as well as the left-hand and right-hand sides of (5) is an inequality. In other words, the left-hand sides of (4) and (5) do not equal the respective right-hand sides.

The correct formula that Ms. Crowder should use in place of (4) is:

$$L(V) = \bar{L}_i(V) * S(V),$$

where the bar indicates average load time per stop. Differentiating this accurate expression with respect to volume (V) yields:

$$\partial L(V) / \partial V = \partial \bar{L}_i(V) / \partial V * S(V) + \partial S(V) / \partial V * \bar{L}_i(V)$$

Dividing through by L and multiplying through by V yields:

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

$$(\partial L(V)/\partial V)V/L = (\partial \bar{L}_i(V)/\partial V * S(V))V/L + (\partial S(V)/\partial V * \bar{L}_i(V))V/L.$$

By recognizing that $L(V) = \bar{L}_i(V) * S(V)$ we can cancel terms to yield:

$$\mathcal{E}_V = \mathcal{E}_S + \mathcal{E}_{\bar{L}_i}, \text{ where } \mathcal{E}_V \text{ is the overall elasticity of load time with respect to volume.}$$

This can be contrasted with Ms. Crowder's erroneous expression listed in part (a) of this question, which can be written as: $\mathcal{E}_V = \mathcal{E}_S + \mathcal{E}_{\bar{L}_i} - \mathcal{E}_S \mathcal{E}_{\bar{L}_i}$.

However, if Ms. Crowder's expression (5) could be regarded as correct, then the subsequent algebra does yield:

$$[(\partial / \partial V) * (V/L)] = E_S + (1 - E_S) * E_{\bar{L}_i}$$

(b) Not confirmed. The elemental load variability is given by:

$\partial L / \partial V * \bar{V} / L(\bar{V})$. That is, the econometric equation, evaluated at mean volume, provides an unbiased estimator of the load time variability.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC.**

ADVO/USPS-TI2-11. With regard to the Engineering Standards data or any other Delivery Redesign data, did you conduct any analyses of that data in an attempt to develop any alternative analyses of out-of-office street time, such as the following. If so, please provide the analyses, explain what you did, and explain why you have not presented it.

- (a) Variability analyses of collection, street support, drive time, FAT/CAT, or load time?**
- (b) Any disaggregation of drive, FAT/CAT, or load time by delivery type (Level 11.2 codes), delivery type status (Level 11.3 codes), activity (Level 11.4 codes), or activity detail (Level 11.4.1 codes)?**
- (c) Any comparison with disaggregated CCS results (volumes, possible stops, or actual stops by route type or stop type)?**
- (d) Any other types of out-of-office costing analyses?**

RESPONSE:

(a) – (d) I am aware of a preliminary load-time variability analysis that is based on the time study data in the Delivery Redesign data base. It is expected that a draft of a report on this analysis will be completed in approximately two weeks and will be provided as USPS-LR-I-310.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T12-12. Please refer to the table in your response to MPA/USPS-TIO-21 (redirected from witness Kingsley) concerning estimated access time per actual stop for foot, park & loop, and dismount stops.

- (a) Provide the full set of data and calculations, including your sources, used to develop the estimated access times per actual stop for foot, park & loop, and dismount stops.
- (b) Are the figures in the first table (18.45 seconds in 1989 and 13.19 seconds in 1998) an average for foot, park & loop, and dismount stops combined, or an average for only foot/park & loop? Please explain.
- (c) Provide your explanation or opinion of why the average access time for such stops in (b) has declined so much in nine years (from 18.45 to 13.19 seconds per stop).

RESPONSE:

- (a) The requested data set will be provided in USPS-LR-I-305, to be filed shortly.
- (b) Each of these figures is an estimate of the ratio of total access time summed over the foot and park & loop segments of all routes (including routes that are classified as curb routes) divided by the estimated number of actual stops of all types on these segments.
- (c) The primary reason for this reduction is the large reduction in the route/access FAT street-time percentage that resulted from substitution of the new street-time proportions derived from the ES database for the proportions derived from the 1986 STS study. The average route/access FAT percentage in the 1989 access cost analysis was derived from the 1986 proportions, and it equaled 47.3% of total accrued street-time cost. The average route/access FAT percentage in the 1998 analysis was derived from the new street-time proportions, and it equaled 29.5% of total accrued street-time cost.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVOIUSPS-T12-13. Please refer to the table in your response to MPA/USPS-TIO-21 concerning estimated access time per actual stop for curblin stops.

- (a) Provide the full set of data and calculations, including your sources, used to develop the estimated access times per actual stop for curblin stops.
- (b) Provide your explanation or opinion of why the average access time for such stops in (e) has declined from 12.06 seconds in 1989 to 4.91 seconds per stop in 1998.

RESPONSE:

- (a) The requested data set will be provided in USPS-LR-I-305, to be filed shortly.
- (b) The primary reason for this reduction is the large reduction in the route/access CAT street-time percentage that resulted from substitution of the new street-time proportions derived from the ES database for the proportions derived from the 1986 STS study. The average route/access CAT street-time percentage in the FY 1989 city carrier worksheets was derived from the 1986 proportions, and it equaled 8.8% of total accrued street-time cost. The average route/access FAT percentage in the FY 1998 city carrier worksheets was derived from the new street-time proportions, and it equaled only 3.9% of total accrued street-time cost.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVOIUSPS-T12-14. Please refer to your response to MPA/USPS-TIO-22, where you state that the deliveries data required to answer the interrogatory could not be located. Do you have any opinion or knowledge (as opposed to actual data) as to:

- (a) whether the average run time among curbline deliveries has changed as much as the average access time has changed (as indicated in your response to MPA/USPS-TIO-21)? Please explain fully.**
- (b) whether the average run time among park & loop, foot, or dismount deliveries has changed as much as the average access time has changed (as indicated in your response to MPAJSPS-TIO-21)? Please explain fully.**
- (c) whether the average run time among central deliveries has changed between FY89 and FY98? Please explain fully.**

RESPONSE:

(a) In my opinion, average running time per delivery point on the curbline segments of routes declined from FY89 to FY98 for the same reason that average access time per stop declined, as shown in my response to MPA/USPS-T10-21. This decline was the result of large reductions in the route/access CAT percentages of total street time cost. Furthermore, the ratio of route/access CAT access time to total route/access CAT running time changed very little between FY89 and FY98 because curb running time elasticities were virtually constant over that period. Therefore the percentage reduction in route/access CAT running time was nearly the same as the percentage reduction in route/access CAT access time between FY89 and FY98, as is shown in the following table.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

**ESTIMATED ACCESS AND RUNNING TIME HOURS
ON CURBLINE ROUTE SEGMENTS
(Costs and Hours are in 1,000)**

BASE YEAR	CURB ACCESS TIME COST	CURB ACCESS TIME HOURS	PERC. CHANGE IN CURB ACCESS TIME HOURS	CURB RUNNING TIME COST	CURB RUNNING TIME HOURS	PERC. CHANGE IN CURB RUNNING TIME HOURS
1989	\$201,595	10,391		409,036	21,084	
1998	\$142,257	5,484	-47.23%	291,719	11,246	-47.66%

(b) and (c) In my opinion, average running time per delivery point on the park & loop segments of routes also declined from FY89 to FY98 for the same reason that average access time per stop declined on these segments. This decline was the result of large reductions in the route/access FAT percentages of total street time cost. Furthermore, the ratio of route/access FAT access time to total route/access FAT running time changed very little between FY89 and FY98 because park & loop and foot running time elasticities were virtually constant over that period. Therefore the percentage reduction in route/access FAT running time was nearly the same as the percentage reduction in route/access FAT access time between FY89 and FY98, as is shown in the following table.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.

ESTIMATED ACCESS AND RUNNING TIME HOURS ON
FOOT/PARK & LOOP ROUTE SEGMENTS
(Costs and Hours are in 1,000)

BASE YEAR	FOOT/ PARK & LOOP ACCESS TIME COST	FOOT/ PARK & LOOP ACCESS TIME HOURS	PERC. CHANGE IN FOOT/ PARK & LOOP ACCESS TIME HOURS	FOOT/ PARK & LOOP RUNNING TIME COST	FOOT/ PARK & LOOP RUNNING TIME HOURS	PERC. CHANGE IN FOOT/ PARK & LOOP RUNNING TIME HOURS
1989	\$1,099,118	56,656		\$2,213,716	114,109	
1998	\$1,066,415	41,111	-27.44%	\$2,207,996	85,119	-25.41%

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-T12-15. Please refer to your response to MPA/USPS-T10-23.

- (a) Provide the full set of data and calculations, including your sources, used to develop the estimated travel times for each route group (foot, park & loop, curblines) in 1989 and 1998.
- (b) Aside from the fact that the FY89 data were collected by the Street Time Survey and the FY98 data were collected by the Engineered Standards Activity Sampling, do you have any explanation or opinion of:
- (1) Why the average travel time per possible stop on foot routes has declined from 9.67 seconds in 1989 to 4.80 seconds per stop in 1998.
 - (2) Why the average travel time per possible stop on park & loop routes has increased from 3.09 seconds in 1989 to 3.94 seconds per stop in 1998.
 - (3) Why the average travel time per possible stop on curblines routes has increased from 1.14 seconds in 1989 to 1.86 seconds per stop in 1998.
- (c) Explain fully your understanding of whether the FAT (foot and park & loop Foot Access Test) models from which the proportions of foot/park & loop/dismount access and route time are derived show such a major decline in amount of foot and park & loop access time.
- (d) Explain fully your understanding of whether the CAT (Curblines Access Test) model from which the proportions of curblines access and route time are derived shows such a major decline in amount of curblines access time.

RESPONSE:

- (a) The requested data set will be provided in USPS-LR-I-305, to be filed shortly.
- (b) (1) There are two possible changes that could have contributed to this decline. First, it is possible that possible stops per foot route increased substantially from 1989 to 1998, while travel time per route remained relatively unchanged. Second, it is possible that the average distance between the delivery unit and the beginning of the route decreased substantially from 1989 to 1998. The data required to test these conjectures are not available.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

(b) (2) and (3) In this case, it is possible that possible stops per route decreased from 1989 to 1998, or that the average distance between the delivery unit and beginning of the route increased over the same period. Again, the data needed to conduct the required analysis are unavailable.

(c) and (d) The FAT and CAT models are not sources of any observed changes in street-activity times per stop. These models are used solely to estimate the elasticities of running time with respect to actual stops. Moreover, these elasticities are functions solely of coverage ratios, that is, the percentages of stops that are accessed. Since these coverage ratios changed very little from 1989 to 1998, the running time elasticities also changed very little over the same period. Therefore, the models themselves are not responsible for any observed large changes in absolute or relative carrier times.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-T12-16. Please refer to your response to ADVO/USPS-T13-23 (a), redirected to you from witness Raymond. There you state:

"The universe under study and the sampling frame can be defined as the population of all city carrier routes (other than phantom routes) in existence during PFY 1997 - Quarter 4. The units of the analysis are, according to this view, the individual routes. The universe and sampling frame can also be viewed as a set of six subpopulations. One sub-population is defined for each of the six major route categories: foot, business motorized, residential curb, residential park & loop, mixed curb, and mixed park & loop."

However, witness Raymond states that the Phase 1 on-day studies ranged from 10/14/96 to 2/13/97 and the Phase 2 multiple-day studies time frame ranged from 515197 to 4123198 (page 8, USPS-T-13).

- (a) Please explain fully how the universe and sampling frame for the routes in the Phase 1 single-day study could have been all routes in existence in PFY 1997 - Quarter 4.
- (b) Please explain fully how the universe and sampling frame for the routes in the Phase 2 multiple-day study could have been all routes in existence in PFY 1997 -Quarter 4.
- (c) On page 34 of your testimony you indicate that four of witness Raymond's sampled files could not be located on the Carrier Route Master File for PFY 1997 - Quarter 4. Please confirm that these four routes are:

	Route	USPS Area	ES Observation Dates
CY 50	8739	Southeast	7/31/97
CY 66	0257	Pacific	12/19/97
CY 66	0281	Pacific	1/13/98
CY 04	4999	Allegheny	1/30/98

If these are not the four routes that could not be located, please provide the correct information.

- (d) Please explain why there were four routes in Mr. Raymond's sample but were not in his universe or sampling frame.
- (e) Do the results presented in parts (a) and (c) of your response include the four routes that could not be located on the Carrier Route Master File for PFY 1997 - Quarter 4?

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

- (f) Please provide the route types and sample weights that you have used (in your response to OCAIUSPS-T-12-6) for the four routes that could not be located in the PFY 1997 - Quarter 4 Carrier Route Master File.

RESPONSE:

(a) and (b). It would be more accurate to state that the universe under study can be defined as the population of all city carrier routes (other than phantom routes) in existence between PFY 1997 - Quarter 1 and PFY 1998 - Quarter 3. The quoted statement from my response to ADVO/USPS-T13-23 (a) refers to PFY 1997 - Quarter 4 because it is the mid-point between these beginning and ending postal quarters. Note, however, that the population of routes changed slowly between PFY 1997 - Quarter 1 and PFY 1998 - Quarter 3. As the table below demonstrates, the total number of city routes, excluding phantom routes, decreased, but by only 1,694 or 1.02%, from PFY 1997 - Quarter 2 through PFY 1998 - Quarter 3. (Comparable PFY 1997 - Quarter 1 are not available). Therefore, the population in existence during PFY 1997 - Quarter 4 serves as a good approximation of the average population of routes from PFY 1997 - Quarter 1 through PFY 1998 - Quarter 3.

Total Number of City Carrier Letter Routes.
PFY 1997 - Q1 Through PFY 1998 - Q3

	97-Q2	97-Q4	98-Q3
Foot Routes	20,267	19,115	15,995
Residential Loop Routes	82,745	82,908	81,959
Residential Curb Routes	51,134	51,486	54,281
Mixed Loop Routes	5,205	5,220	4,976
Mixed Curb Routes	4,049	4,056	4,374
Business Motorized Routes	3,300	3,322	3,421
Total Routes	166,700	166,107	165,006

(c) Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

(d) I cannot explain the absence of these four routes from the City Route Master File. However, the decision to include or exclude these four routes from the calculation of street-time percentages has virtually no impact on the final estimates of these percentages. See my response to OCA/USPS-T12-6(c).

(e) No.

(f) The route types assigned to these routes were the route types reported in the ES data set. They are as follows:

Route 8739 – Residential Loop

Route 0257 – Residential Loop

Route 0281 – Mixed Loop

Route 4999 – Residential Loop

Since the data on total population residential loop routes and mixed loop routes that were needed to form tally weights for these four routes were not available, I assigned tally weights of one to all tallies recorded for those routes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-TI2-17. Please refer to your response to ADVO/USPS-T13-23 (a), redirected to you from witness Raymond and your statement cited in the above interrogatory.

- (a) Please explain fully how Mr. Raymond's sampling from the universe of city routes (that you have identified) was performed so as to ensure adequate representation of the universe.**
- (b) Mr. Raymond has stated that, once the sites (zip codes) were selected, the routes within those sites were selected randomly. Does your comment that the universe (and sampling frame) can be viewed as a set of six populations mean that Mr. Raymond developed a sampling scheme that segmented the city letter route universe into six populations, each of which sampled randomly at some route-type-specific sampling rate? If so, please provide the details of that sampling scheme and explain how it ensures adequate representation of each of the individual route-type universes.**

RESPONSE:

- (a) I believe Mr. Raymond's responses to OCA/USPS-T13-1 and ADVO/USPS-T13-23(b) show how his sample adequately represents the universe.**
- (b) No. My comment is a suggestion that one could view the ES sample as if it consisted of six sub-samples, each of which was selected from a corresponding subpopulation of routes.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-T12-19. Please refer to your response to ADVO/USPS-T13-23 (a) and (c) redirected to you from witness Raymond. Please confirm that the statistical tests in your response describe the statistical comparison between Mr. Raymond's sampled routes and the universe during the time period over which those routes were sampled. If this is not correct, please so state, and explain that the statistical tests do describe.

RESPONSE:

Confirmed. In my view, these tests also describe the statistical comparison between sampled routes and the universe during the time periods when the work-sampling data were collected.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

ADVO/USPS-T13-23. Please provide the following information with respect to the sample survey that generated the data presented in your testimony and used by USPS witness Baron:

(a) the "definition of the universe under study, the sampling frame and units, and the validity and confidence limits that can be placed on major estimates," as required by Rule 31(k)(2)(ii) of the Commission's Rules of Practice.

(c) the results of all such sampling and statistical tests.

RESPONSE:

(a) The universe under study and the sampling frame can be defined as the population of all city carrier routes (other than phantom routes) in existence during PFY 1997 - Quarter 4. The units of the analysis are, according to this view, the individual routes. The universe and sampling frame can also be viewed as a set of six sub-populations. One sub-population is defined for each of the six major route categories: foot, business motorized, residential curb, residential park & loop, mixed curb, and mixed park & loop.

The street-time percentages presented in sheet 7.0.4.1 of the segment 7 workbook, Cs06&7.xls (Docket No. R2000-1, USPS LR-I-80) for each route type should be regarded as sample-based estimates of the corresponding sub-population street-time percentages. In order to derive standard errors for these estimates, we can also view them as "ratio" estimates of the sub-population ratios of total tallies for the given street activities (load, street support, driving time, route/access FAT, route/access CAT, and street-box collection) to gross total tallies over all activities combined.

Table 1 shows the application of this approach to the sub-population of all residential park & loop routes. In FY 1997 - QTR 4, there were 82,908 such

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

2

routes. The portion of the ES database used to estimate the residential park & loop street-time percentages consists of a sample of 110 of these routes. Each of the six residential park & loop street-time percentages reported in Cs06&7.xls, lines 9-14, can be viewed as the sample ratio of total weighted tallies over all 110 routes for the given street-activity to the total of the weighted tallies over all six activities over all such routes. The standard error for each ratio is derived from William Cochran's formula for the standard error of the sample ratio. This formula is equation 2.46 in Cochran's book Sampling Techniques (John Wiley & Sons, 1977, at 32). USPS LR-I-292 presents in greater detail the application of that formula to the estimation of the standard errors for all the street-time percentages.

Table 1 also shows 95% confidence intervals for the estimated street-time percentages. These intervals are derived from the standard normal probability distribution under the assumption that the ratio of the deviation of each estimated percentage from its mean over its estimated standard error is normally distributed with a mean of 0 and variance of 1.

TABLE 1. ESTIMATED STANDARD ERRORS AND 95% CONFIDENCE INTERVALS FOR SAMPLE ESTIMATES OF RESIDENTIAL PARK & LOOP STREET-TIME PERCENTAGES

Street-Time Activity	Ratio of Total Tallies for the Activity Over 110 Sample Routes to Total Tallies for all Street Activities over all such Routes	Estimated Standard Error of Ratio	95% Confidence Interval
Load	.3527	.0196	.3143-.3910
Street Support	.1779	.0083	.1616-.1942
Driving Time	.1123	.0093	.0940-.1306
Route/Access FAT	.3320	.0219	.2891-.3749
Route/Access CAT	.0222	.0050	.0124-.0321
Collection	.0029	.0009	.0011-.0047

Additional results comparable to table 1 could be prepared for all other route types: mixed park & loop, business motorized, etc. However, a few concerns relating to the correct interpretation of the estimated standard errors and confidence intervals must be considered before the appropriate course of action can be determined. First, ratio estimates (i.e., sample street-time percentages) derived from small samples are usually slightly biased estimates of the population ratios (Cochran 31). Also, for small sample sizes, the sampling distributions of the sample street-time percentages are skew, and the estimated standard errors might be too low (Cochran, 31-32, 153, 156). Moreover, the skewness of the sampling distribution implies that the ratio of the deviation of each sample percentage from its expected value over its estimated standard error also has a distribution that may be too highly skewed to justify using the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

4

standard normal distribution to derive confidence intervals (Cochran 31-32, 153, 156).

Cochran also observes, however, that this skewness of the sampling distribution of the sample ratio and the bias of that ratio and of its standard error estimate become inconsequential for large samples (Cochran 31-32, 153, 156, 160). The obvious question is: how large is large enough? Cochran states that "as a working rule," the ratio estimate and its estimated standard error can be regarded as unbiased, and the sampling distribution of this ratio as being normal, for sample sizes in excess of 30, provided the coefficients of variation of the numerator and denominator of the ratio are both less than 10% (Cochran, 153). Given this rule, the samples for the mixed park & loop, mixed curb, and business motorized categories are small enough for one to question whether street-time percentages derived from these samples, and the estimated standard errors of these percentages are unbiased, and whether the sampling distributions of the percentages achieve normality.

It should also be emphasized, however, that there exists an important alternative costing approach that eliminates this issue of small sample sizes. This approach is to aggregate the existing six route type categories into only three categories. Specifically, the mixed park & loop, business motorized and residential park & loop categories are aggregated into a single park & loop route type. The mixed curb and residential curb categories are aggregated into a single curb route type. The foot category is left as is.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

5

Revised
5/9/00

The key advantage of this new approach is that the three remaining categories – foot, aggregate park & loop, and aggregate curb – all have large samples. The foot category, which is unchanged from the original analysis, has 36 routes. The new, aggregate park & loop category has 121 sample routes, and the new, aggregate curb route category has 179 sample routes.

Tables 2-4 show standard errors and confidence intervals for the new street-time percentages calculated for this new set of route types. (These new percentages, standard errors and confidence intervals are derived in USPS LR-I-292). The results are clearly valid, given the large sample sizes, and they generally show relatively narrow confidence intervals for the new, estimated street-time percentages.¹ The exceptions are the wide confidence intervals calculated for the load time, street support, and route-access/FAT activities within the foot route-type category.

TABLE 2. ESTIMATED STANDARD ERRORS AND 95% CONFIDENCE INTERVALS FOR SAMPLE ESTIMATES OF FOOT STREET-TIME PERCENTAGES

Street-Time Activity	Ratio of Total Tallies for the Activity Over 36 Sample Routes to Total Tallies for all Street Activities over all such Routes	Estimated Standard Error of Ratio	95% Confidence Interval
Load	.4935	.1127	.2725-.7145
Street Support	.1523	.0408	.0725-.2322
Driving Time	.0216	.0092	.0036-.0396
Route/Access FAT	.3251	.0740	.1801-.4702
Route/Access CAT	.0044	.0036	-.0027-.0115
Collection	.0031	.0019	-.0006-.0067

¹ This assertion that the confidence limits are statistically valid is supported by the fact that all three samples exceed the 30 unit threshold suggested by Cochran.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

6

TABLE 3. ESTIMATED STANDARD ERRORS AND 95% CONFIDENCE INTERVALS FOR SAMPLE ESTIMATES OF STREET-TIME PERCENTAGES FOR THE AGGREGATE PARK & LOOP ROUTE TYPE

Street-Time Activity	Ratio of Total Tallies for the Activity Over 121 Sample Routes to Total Tallies for all Street Activities over all such Routes	Estimated Standard Error of Ratio	95% Confidence Interval
Load	.3516	.0185	.3154-.3879
Street Support	.1769	.0082	.1608-.1929
Driving Time	.1157	.0090	.0980-.1333
Route/Access FAT	.3288	.0209	.2878-.3697
Route/Access CAT	.0242	.0051	.0143-.0341
Collection	.0029	.0009	.0011-.0047

TABLE 4. ESTIMATED STANDARD ERRORS AND 95% CONFIDENCE INTERVALS FOR SAMPLE ESTIMATES OF STREET-TIME PERCENTAGES FOR THE AGGREGATE CURB ROUTE TYPE

Street-Time Activity	Ratio of Total Tallies for the Activity Over 179 Sample Routes to Total Tallies for all Street Activities over all such Routes	Estimated Standard Error of Ratio	95% Confidence Interval
Load	.4780	.0181	.4425-.5136
Street Support	.1775	.0076	.1627-.1923
Driving Time	.0978	.0140	.0703-.1252
Route/Access FAT	.0977	.0144	.0695-.1259
Route/Access CAT	.1479	.0131	.1222-.1737
Collection	.0010	.0003	.0004-.0017

Another critical advantage of the aggregation approach, aside from producing large sample sizes for all route categories, is that the consolidation of the official six route types into only three route types does not significantly affect the final segment 7 cost results. Tables 5 and 6 show that the final segment 7

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

7

volume-variable costs by component that are estimated through the aggregation approach differ by only a few million dollars per mail subclass from the official BY 1998 volume-variable costs estimated in the Cs06&7.xls workbook presented in USPS LR-I-80.

Tables 5-6 demonstrate this result on a component by component basis. Observe, first, that Table 5 is broken into two parts. The first part, shown on pages 10-11, compares the volume-variable costs derived through the aggregation approach just for the load time and access activities with corresponding official Cs06&7.xls BY 1998 costs. The second part of table 5, shown on pages 12-13, compares volume-variable costs derived through the aggregation approach with official volume-variable costs for the route-time and street-support activities.

Table 6 sums the volume-variable costs from parts 1 and 2 of table 5. Thus, table 6 shows the changes in gross total segment 7 volume-variable costs by mail subclass summed over all street activities that result from substituting the aggregation approach for the official BY 1998 approach. Overall, table 6 shows that gross total volume-variable costs summed across all mail subclasses increase by only \$10,050,000 or 0.32%. However, for some mail subclasses, such as Periodicals, costs decrease by small amounts. The largest relative cost increase is the 1.31% increase in Certified and Insurance costs. The largest relative cost decrease is the 1.85% decrease in Standard B Library Mail.

Moreover, this relative insignificance of the cost changes resulting from substitution of the route-category aggregation approach for the official BY 1998

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

8

analysis is not an unexpected result. A critical aspect of the segment 7 letter-route cost analysis is that once accrued costs have been allocated to the residential park & loop, mixed park & loop, and business motorized categories all subsequent cost calculations are identical across all three cost pools.

Specifically, the parameters that split accrued route/access FAT and route/access CAT costs into route and access portions, and that determine the volume-variable access costs by mail subclass are the same for mixed loop and business motorized route costs as they are residential park & loop costs. So, also, are the parameters applied to accrued driving time, load-time, collection box, and street support costs in order to derive volume-variable costs by subclass.

The same conclusions apply to the mixed curb and residential curb route types. Once accrued costs have been allocated to the mixed curb and residential curb categories, all subsequent cost calculations are identical across the resulting two cost pools. Again, the parameters that split accrued route/access FAT and CAT foot route costs into route and access portions, and that determine the volume-variable access costs by mail subclass are the same for both cost pools. So, also, are the parameters applied to accrued driving time, load-time, collection box, and street-support costs in order to derive volume-variable costs by subclass.

Thus, the aggregate approach offers a logical alternative for deriving total segment 7 volume-variable costs by mail subclass. These costs differ very little from corresponding official BY 1998 costs presented in LR-I-180. Moreover, the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

9

route samples used to derive the new street-time percentages estimated in the aggregate approach are now unequivocally large enough in all cases to ensure that estimated standard errors and confidence intervals for these percentages are statistically valid.

A final, key implication of this virtual equality between the aggregate analysis volume-variable costs and corresponding official BY 1998 costs is that it negates concerns raised earlier regarding possible biases in the official street-time percentages calculated for all six route-type categories. The fact that the aggregation procedure's elimination of the concern of too few routes in some of the six official route-category samples, which was the very problem that had raised the bias issue in the first place, nevertheless produces the same costs as do the official samples establishes that any such biases are insignificant.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

10

TABLE 5, PART 1. COMPARISON OF BY 1998 SEGMENT 7 VOLUME-VARIABLE LOAD-TIME AND ACCESS COSTS DERIVED FROM THE AGGREGATE APPROACH WITH OFFICIAL BY 1998 VOLUME-VARIABLE LOAD-TIME AND ACCESS COSTS PRESENTED IN CS06&7.XLS, USPS LR-I-80 (\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	OFFICIAL LOAD-TIME COST	LOAD-TIME COST, AGGREGATE APPROACH	DIFFERENCE	OFFICIAL ACCESS COST	ACCESS COST, AGGREGATE APPROACH	DIFFERENCE
FIRST-CLASS MAIL:						
SINGLE-PIECE LETTERS	314,079	317,929	3,850	66,291	65,571	(720)
PRESORT LETTERS	307,014	310,878	3,864	25,939	25,947	8
TOTAL LETTERS	621,093	628,807	7,714	92,230	91,518	(712)
SINGLE-PIECE CARDS	22,510	22,788	278	4,476	4,438	(38)
PRESORT CARDS	16,732	16,943	211	1,750	1,751	1
TOTAL CARDS	39,242	39,731	489	6,226	6,189	(37)
TOTAL FIRST-CLASS	660,335	668,538	8,203	98,456	97,707	(749)
PRIORITY MAIL	49,856	50,470	614	27,369	27,356	(13)
EXPRESS MAIL	22,406	22,662	256	7,752	7,751	(1)
MAILGRAMS	103	105	2	85	85	-
PERIODICALS:						
IN-COUNTY	8,891	9,003	112	678	679	1
OUTSIDE COUNTY:						
REGULAR	69,247	70,118	871	5,281	5,288	7
NON-PROFIT	20,566	20,825	259	1,568	1,570	2
CLASSROOM	585	592	7	45	45	-
TOTAL PERIODICALS	99,289	100,538	1,249	7,572	7,582	10
STANDARD A:						
SINGLE PIECE RATE	1,496	1,511	15	2,790	2,768	(22)
COMMERCIAL STANDARD:						
ENHANCED CARR RTE	352,282	356,715	4,433	32,931	32,940	9
REGULAR	297,595	301,340	3,745	17,661	17,667	6
TOTAL COMMERCIAL	649,877	658,055	8,178	50,592	50,607	15
AGGREGATE NONPROFIT:						
ENHANCED CARR RTE	16,495	16,702	207	2,197	2,201	4
REGULAR	72,771	73,687	916	1,645	1,646	1
TOTAL NONPROFIT	89,266	90,389	1,123	3,842	3,847	5

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

11

TABLE 5, PART 1. COMPARISON OF BY 1998 SEGMENT 7 VOLUME-
VARIABLE LOAD-TIME AND ACCESS COSTS DERIVED FROM THE
AGGREGATE APPROACH WITH OFFICIAL BY 1998 VOLUME-VARIABLE
LOAD-TIME AND ACCESS COSTS PRESENTED IN CS06&7.XLS,
USPS LR-I-80 (\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	OFFICIAL LOAD-TIME COST	LOAD-TIME COST, AGGREGATE APPROACH	DIFFERENCE	OFFICIAL ACCESS COST	ACCESS COST, AGGREGATE APPROACH	DIFFERENCE
TOTAL STANDARD A	740,639	749,955	9,316	57,224	57,222	(2)
STANDARD MAIL (B):						
PARCELS ZONE RATE	25,240	25,553	313	10,028	10,023	(5)
BOUND PRINTED MATTER	22,082	22,353	271	15,024	15,024	-
SPECIAL STANDARD	10,313	10,441	128	5,877	5,877	-
LIBRARY MAIL	1,492	1,510	18	878	877	(1)
TOTAL STANDARD (B)	59,127	59,857	730	31,807	31,801	(6)
US POSTAL SERVICE	1,619	1,639	20	408	404	(4)
FREE MAIL	1,835	1,858	23	69	68	(1)
INTERNATIONAL MAIL	6,134	6,206	72	4,076	4,068	(8)
TOTAL MAIL	1,641,343	1,661,828	20,485	234,818	234,044	(774)
SPECIAL SERVICES:						
REGISTRY	5,183	5,224	61	-	-	-
CERTIFIED	93,882	95,064	1,182	-	-	-
INSURANCE	4,516	4,572	56	-	-	-
COD	1,960	1,984	24	-	-	-
SPECIAL DELIVERY						
MONEY ORDERS						
STAMPED ENVELOPES						
SPECIAL HANDLING						
POST OFFICE BOX						
OTHER	522	522	-	-	-	-
TOTAL SPECIAL SERVICES	106,043	107,368	1,323	-	-	-
TOTAL VOLUME- VARIABLE	1,747,386	1,769,194	21,808	234,818	234,044	(774)
INSTITUTIONAL	880,255	890,907	10,652	1,403,993	1,406,577	2,584
GRAND TOTAL	2,627,641	2,660,101	32,460	1,638,811	1,640,621	1,810

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

12

TABLE 5, PART 2. COMPARISON OF BY 1998 SEGMENT 7 VOLUME-VARIABLE ROUTE-TIME AND STREET-SUPPORT COSTS DERIVED FROM THE AGGREGATE APPROACH WITH OFFICIAL BY 1998 VOLUME-VARIABLE ROUTE-TIME AND STREET SUPPORT COSTS PRESENTED IN CS06&7.XLS, USPS LR-I-80 (\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	OFFICIAL ROUTE-TIME COST	ROUTE-TIME COST, AGGREGATE APPROACH	DIFFERENCE	OFFICIAL COST OF STREET SUPPORT OF LOAD, ACCESS, AND ROUTE	COST OF STREET SUPPORT OF LOAD, ACCESS, AND ROUTE, AGGREGATE APPROACH	DIFFERENCE
FIRST-CLASS MAIL:						
SINGLE-PIECE LETTERS	12,637	11,817	(820)	273,790	272,690	(1,100)
PRESORT LETTERS	11,681	10,924	(757)	150,680	150,915	235
TOTAL LETTERS	24,318	22,741	(1,577)	424,470	423,604	(866)
SINGLE-PIECE CARDS	175	163	(12)	15,254	15,229	(25)
PRESORT CARDS	61	57	(4)	6,874	6,905	32
TOTAL CARDS	236	220	(16)	22,128	22,134	6
TOTAL FIRST-CLASS	24,554	22,961	(1,593)	446,597	445,738	(859)
PRIORITY MAIL	25,451	23,800	(1,651)	25,582	25,720	138
EXPRESS MAIL	2,100	1,964	(136)	6,204	6,310	106
MAILGRAMS	84	78	(6)	49	49	0
PERIODICALS:						
IN-COUNTY	2,573	2,407	(166)	3,681	3,696	15
OUTSIDE COUNTY:						
REGULAR	20,042	18,743	(1,299)	42,741	42,685	(56)
NON-PROFIT	5,953	5,567	(386)	10,855	10,861	7
CLASSROOM	169	158	(11)	213	215	2
TOTAL PERIODICALS	28,737	26,875	(1,862)	57,490	57,458	(32)
STANDARD A:						
SINGLE PIECE RATE	1,559	1,458	(101)	3,624	3,601	(22)
COMMERCIAL STANDARD						
ENHANCED CARR RTE	33,239	31,083	(2,156)	127,904	128,767	863
REGULAR	27,123	25,364	(1,759)	160,785	160,796	11
TOTAL COMMERCIAL	60,362	56,447	(3,915)	288,689	289,563	874
AGGREGATE NONPROFIT:						
ENHANCED CARR RTE	1,099	1,027	(72)	7,307	7,334	27
REGULAR	4,582	4,285	(297)	34,225	34,279	54

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

13

TABLE 5, PART 2. COMPARISON OF BY 1998 SEGMENT 7 VOLUME-VARIABLE ROUTE-TIME AND STREET-SUPPORT COSTS DERIVED FROM THE AGGREGATE APPROACH WITH OFFICIAL BY 1998 VOLUME-VARIABLE ROUTE-TIME AND STREET SUPPORT COSTS PRESENTED IN CS06&7.XLS, USPS LR-I-80 (\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	OFFICIAL ROUTE-TIME COST	ROUTE-TIME COST, AGGREGATE APPROACH	DIFFERENCE	OFFICIAL COST OF STREET SUPPORT OF LOAD, ACCESS, AND ROUTE	COST OF STREET SUPPORT OF LOAD, ACCESS, AND ROUTE, AGGREGATE APPROACH	DIFFERENCE
TOTAL NONPROFIT	5,681	5,312	(369)	41,532	41,613	81
TOTAL STANDARD A	67,602	63,217	(4,385)	333,845	334,777	932
STANDARD MAIL (B):						
PARCELS ZONE RATE	14,214	13,292	(922)	10,150	10,238	88
BOUND PRINTED MATTER	10,609	9,921	(688)	9,869	9,961	92
SPECIAL STANDARD	5,971	5,583	(388)	4,322	4,363	41
LIBRARY MAIL	1,691	1,582	(109)	851	854	3
TOTAL STANDARD (B)	32,485	30,378	(2,107)	25,192	25,417	225
US POSTAL SERVICE	491	459	(32)	2,479	2,460	(19)
FREE MAIL	194	181	(13)	555	561	6
INTERNATIONAL MAIL	1,273	1,190	(83)	4,161	4,168	7
TOTAL MAIL	182,971	171,103	(11,868)	902,155	902,659	504
SPECIAL SERVICES:						
REGISTRY	-	-	-	1,219	1,238	19
CERTIFIED	-	-	-	21,557	21,904	346
INSURANCE	-	-	-	990	1,007	17
COD	-	-	-	480	487	7
SPECIAL DELIVERY	-	-	-	-	-	-
MONEY ORDERS	-	-	-	-	-	-
STAMPED ENVELOPES	-	-	-	-	-	-
SPECIAL HANDLING	-	-	-	-	-	-
POST OFFICE BOX	-	-	-	82	81	(1)
OTHER	-	-	-	920	912	(8)
TOTAL SPECIAL SERVICES	-	-	-	25,249	25,629	380
TOTAL VOLUME-VARIABLE	182,971	171,103	(11,868)	927,404	928,288	884
INSTITUTIONAL	2,048,947	2,005,984	(40,963)	836,591	854,265	17,674
GRAND TOTAL	2,229,918	2,177,087	(52,831)	1,763,998	1,782,553	18,558

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

14

TABLE 6. COMPARISON OF BY 1998 GROSS TOTAL SEGMENT 7
VOLUME-VARIABLE COSTS DERIVED FROM THE AGGREGATE
APPROACH WITH CORRESPONDING OFFICIAL BY 1998 VOLUME-
VARIABLE COSTS PRESENTED IN CS06&7.XLS, USPS LR-I-80
(\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	TOTAL LOAD-TIME, ACCESS, ROUTE, & STREET SUPPORT		DIFFERENCE	% DIFFERENCE
	TOTAL OFFICIAL COST	TOTAL COST, AGGREGATE APPROACH		
FIRST-CLASS MAIL:				
SINGLE-PIECE LETTERS	666,797	668,007	1,210	0.18%
PRESORT LETTERS	495,314	498,664	3,350	0.67%
TOTAL LETTERS	1,162,111	1,166,670	4,559	0.39%
SINGLE-PIECE CARDS	42,415	42,618	203	0.48%
PRESORT CARDS	25,417	25,656	240	0.93%
TOTAL CARDS	67,832	68,274	442	0.65%
TOTAL FIRST-CLASS	1,229,942	1,234,944	5,002	0.41%
PRIORITY MAIL	128,258	127,346	(912)	-0.72%
EXPRESS MAIL	38,462	38,687	225	0.58%
MAILGRAMS	321	317	(4)	-1.15%
PERIODICALS:				
IN-COUNTY	15,823	15,785	(38)	-0.24%
OUTSIDE COUNTY:				
REGULAR	137,311	136,834	(477)	-0.35%
NON-PROFIT	38,942	38,823	(118)	-0.30%
CLASSROOM	1,012	1,010	(2)	-0.21%
TOTAL PERIODICALS	193,088	192,453	(635)	-0.33%
STANDARD A:				
SINGLE PIECE RATE	9,469	9,338	(130)	-1.40%
COMMERCIAL STANDARD:				
ENHANCED CARR RTE	546,356	549,505	3,149	0.57%
REGULAR	503,164	505,167	2,003	0.40%
TOTAL COMMERCIAL	1,049,520	1,054,672	5,152	0.49%
AGGREGATE NONPROFIT:				
ENHANCED CARR RTE	27,098	27,264	166	0.61%
REGULAR	113,223	113,897	674	0.59%
TOTAL AGGREG NONPROFIT	140,321	141,161	840	0.60%
TOTAL STANDARD A	1,199,310	1,205,171	5,861	0.49%
STANDARD MAIL (B):				
PARCELS ZONE RATE	59,632	59,106	(526)	-0.89%
BOUND PRINTED MATTER	57,584	57,259	(325)	-0.57%
SPECIAL STANDARD	26,483	26,264	(219)	-0.83%
LIBRARY MAIL	4,912	4,823	(89)	-1.85%
TOTAL STANDARD (B)	148,611	147,453	(1,158)	-0.79%
US POSTAL SERVICE	4,997	4,962	(35)	-0.71%
FREE MAIL	2,653	2,666	15	0.55%
INTERNATIONAL MAIL	15,644	15,632	(12)	-0.08%
TOTAL MAIL	2,981,287	2,969,634	8,347	0.28%
SPECIAL SERVICES:				
REGISTRY	6,382	6,462	80	1.23%
CERTIFIED	115,439	116,968	1,528	1.31%
INSURANCE	5,506	5,579	73	1.31%
COD	2,440	2,471	31	1.24%

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

15

**TABLE 6. COMPARISON OF BY 1998 GROSS TOTAL SEGMENT 7
VOLUME-VARIABLE COSTS DERIVED FROM THE AGGREGATE
APPROACH WITH CORRESPONDING OFFICIAL BY 1998 VOLUME-
VARIABLE COSTS PRESENTED IN CS06&7.XLS, USPS LR-I-80
(\$1,000)**

CLASS, SUBCLASS, OR SPECIAL SERVICE	TOTAL LOAD-TIME, ACCESS, ROUTE, & STREET SUPPORT		DIFFERENCE	% DIFFERENCE
	TOTAL OFFICIAL COST	TOTAL COST, AGGREGATE APPROACH		
SPECIAL DELIVERY	-	-	-	
MONEY ORDERS	-	-	-	
STAMPED ENVELOPES	-	-	-	
SPECIAL HANDLING	-	-	-	
POST OFFICE BOX	82	81	(1)	-1.29%
OTHER	1,442	1,434	(8)	-0.54%
TOTAL SPECIAL SERVICES	131,292	12,995	1,703	1.28%
TOTAL VOLUME-VARIABLE	3,092,579	3,102,629	10,050	0.32%
INSTITUTIONAL	5,167,786	5,157,733	(10,050)	-0.19%
GRAND TOTAL	8,260,365	8,260,362	-	0.00%

An additional point that is relevant to the results just presented relates to the issue of randomness in the sample of routes that produced the street-time percentage estimates. Witness Lloyd Raymond has stated that not all of the sites from which these 336 city routes were selected were identified through a strictly random procedure. Some sites were non-randomly picked by postal management to ensure that data for all sampled routes located within all sampled sites could be located on Delivery Unit Computers. (See USPS-T-13 at 7-8).

This lack of strict adherence to a rigorous random sampling may cause some analysts to question the validity of the standard errors and confidence intervals estimated for the tally percentages. However, an alternative approach based on a methodology discussed by Cochran effectively resolves

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

16

this issue.² This approach views each of the six sub-populations of routes for which street-time percentages have been estimated as being itself a random sample selected from an infinitely sized superpopulation. Moreover, this approach views the unknown ratio of tallies for each street activity over total tallies for any given route in the superpopulation as being equal to the ratio of mean tallies for the activity over mean total tallies plus a random error term. Since the source of randomness according to this construction is the superpopulation, the finite population of N routes must also be random. Moreover, the observed sample of n routes for each route type is a random sample as well, regardless of how it is selected (Cochran 158-159).

This "superpopulation" approach is also useful for resolving a final concern relating to the analysis presented so far. Thus far, the sample street-time percentage for each street activity has been referred to as the ratio of total sample tallies for this activity to total sample tallies for all activities. This is an oversimplification. Recall from pages 34-35 of my testimony (USPS-T-12), that each ratio actually equals total weighted tallies for the given street activity divided by total weighted tallies over all activities. Moreover, the weight that each tally is multiplied by equals the ratio of total routes in the relevant five-digit zip code within a given route-type category to corresponding total sample routes. It can be shown that this ratio of weighted tallies for any street activity k to weighted tallies over all activities is still an unbiased estimator of the true ratio of total

² It should also be emphasized that although not all sites were selected randomly, a random process was used to select all sampled routes within all of the sites.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

17

activity k tallies over grand total tallies in the entire subpopulation of routes for each route-type category.

This point can be demonstrated through the following analysis. First, let the ratio of weighted tallies for street activity k to grand total weighted tallies over all activities for any given route type be expressed as:

$$\hat{R}_k = \frac{\sum_{j=1}^J \sum_{i=1}^{n_j} w_j T_{ik}}{\sum_{j=1}^J \sum_{i=1}^{n_j} w_j \pi_i} \quad (1)$$

where T_{ik} equals sample tallies for street activity k on route i within five-digit zip code j, π_i equals total tallies on route i in zip code j summed over all street activities, n_j equals total sample routes in the given route type within zip code j, and w_j equals the total population routes in zip code j that are in that same route type divided by n_j . Thus, \hat{R}_k equals the sum of weighted sample tallies for activity k over all routes and over all zip codes for the given route type divided by the corresponding sum of weighted sample tallies for all street-time activities.

The superpopulation approach views the relationship between T_{ik} and π_i in the entire subpopulation of routes for the given route type as having the

$$\text{form: } T_{ik} = (\bar{T}_{ik} / \bar{\pi}_i) * \pi_i + e_{ik} \quad (2)$$

where $\bar{T}_{ik} / \bar{\pi}_i = R_k$, is the subpopulation ratio of mean activity k tallies over all routes and zip codes to the corresponding mean total tallies, and e_{ik} is a stochastic error term (Cochran 158-159,).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

18

The expected value of \hat{R}_k is the expected value of the hypothetical sampling distribution of all possible \hat{R}_k calculated from all possible samples of size $n = \sum_j n_j$. This expected value can be expressed as

$$E(\hat{R}_k) = \sum_{j=1}^J \sum_{i=1}^{n_j} w_j E(T_{ijk}) / \sum_{j=1}^J \sum_{i=1}^{n_j} w_j TT_{ij} \quad (3)$$

since it can be assumed that the w_j and the $w_j TT_{ij}$ are fixed in the repeated samples (Cochran 159, Ronald J. Wonnacott and Thomas H. Wonnacott, Econometrics, John Wiley & Sons, 1979, at 25-26). Moreover, from (2), it is apparent that:

$$E(T_{ijk}) = (\bar{T}_{jk}) / (\overline{TT}_{ij}) * TT_{ij} = R_k * TT_{ij} \quad (4),$$

assuming that $E(e_{ij})$ equals 0. Substitution of (4) into (3) produces

$$E(\hat{R}_k) = \sum_{j=1}^J \sum_{i=1}^{n_j} w_j TT_{ij} R_k / \sum_{j=1}^J \sum_{i=1}^{n_j} w_j TT_{ij} = [(\sum_{j=1}^J \sum_{i=1}^{n_j} w_j TT_{ij} / \sum_{j=1}^J \sum_{i=1}^{n_j} w_j TT_{ij})] R_k = R_k \quad (5)$$

Thus, the weighting procedure still produces an estimated ratio of tallies for each activity k to total tallies over all activities that is an unbiased estimate of the true ratio R_k .

To summarize, Cochran's superpopulation approach clearly applies to the current analysis of street-time tallies. It supports the view that the sampling distributions of the sample weighted street-time percentages exist, that their expected values equal the true subpopulation ratios of tallies for the individual street activities to grand total tallies, and that the estimated standard errors of the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

street-time percentages are unbiased. Moreover, these conclusions are true
regardless of sample size (Cochran 158-160).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC. REDIRECTED FROM WITNESS RAYMOND

20

(c) Please see my response to part (a). See also Witness Raymond's response to ADVO/USPS-T13-23(b).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-1. Please refer to Library Reference LR-I-157. Please provide:

- (a) The data set LTV.FLAT.DATA in PC-readable form (i.e., either on Compact Disk or 3 inch floppies), a listing of its properties, and descriptor/identification for each of its fields.
- (b) If not on the data set LTV.FLAT.DATA, the sample weights for each observation in LTV.FLAT.DATA and used to perform the analyses described in your testimony.

RESPONSE:

- (a) and (b) Docket No. R97-1, USPS LR-H-137 presents the requested data set, listing of properties, and descriptor/identifications. LTV.FLAT.DATA is stored on a floppy disk located on the back cover of this LR.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-2. Please refer to the FY1998 City Carrier Cost System. Please provide for each stop type (SDR, MDR, and BAM):

- (a) The estimated total annual number of actual and possible stops in the USPS system.
- (b) The estimated total annual number of actual and possible deliveries in the USPS system.
- (c) The average possible stops coverage figure.
- (d) The average possible deliveries coverage figure.

RESPONSE:

- (a) Estimated total annual actual and possible stops by stop type are as follows:

STOP TYPE	ACTUAL STOPS	POSSIBLE STOPS	COVERAGE
SDR	12,802,475,000	13,774,754,000	92.94%
MDR	1,150,772,000	1,181,930,000	97.36%
BAM	1,288,917,000	1,433,325,000	89.92%

- (b) Estimated total annual actual and possible deliveries by stop type are as follows:

STOP TYPE	ACTUAL DELIVERIES	POSSIBLE DELIVERIES	COVERAGE
SDR	12,802,475,000	13,774,754,000	92.94%
MDR	7,419,487,000	8,933,328,000	83.05%
BAM	1,555,233,000	1,660,615,000	93.65%

- (c) The average possible stops coverage figure.

See the last column of the table presented in part (a).

- (d) The average possible deliveries coverage figure.

See the last column of the table presented in part (b).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-4. Please refer to Library Reference LR H 58. Please provide:

- (a) The data sets CURBSAS, FOOTAS, and LOOPSAS in PC-readable form (i.e., either on Compact Disk or 3 0 inch floppies), a listing of their properties, and a descriptor/identification for each of their fields.**
- (b) If not on each of the data sets, the sample weights for each observation in those data sets and used to perform the analyses described in your testimony.**

RESPONSE:

- (a) and (b) These data sets have been copied into the PC-readable files CURB.DATA, FOOT.DATA, and LOOP.DATA, and are stored on diskettes. These diskettes have been included as part of a new library reference, USPS LR-I-218, to be filed shortly.**
- (b) I am unaware of any sample weights.**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-6. Question: Please refer to Library Reference LR I-159. As to the National System of City Routes, please provide the following for the USPS total system of routes, separately for each of the ten regions:

(a) In PQ4 FY97, number of 3-D zips and, separately, 5-D zips with city carrier routes.

(b) Per ALDRAN.HQ059TOI .CITY,PQ4FY97, number of city carrier routes where the primary mode of delivery is:

- Foot
- Park & Loop
- Curbline
- Dismount
- Other
- Cannot be determined.

(c) Number of city carrier routes in ALDRAN.HQ059TOI.PQ4FY97 classified by ES.CNTL as:

- Foot
- Park & Loop
- Curbline
- Dismount
- Other
- Cannot be determined.

(d) As to each route delivery mode category in the previous subsection, please provide also, the average number of:

- Residential curb deliveries
- Residential NDCBU deliveries
- Residential centralized deliveries
- Residential other deliveries
- Business curb deliveries
- Business NDCBU deliveries
- Business centralized deliveries
- Business other deliveries.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-6(e). As to each route type listed in the previous subsection, please provide also the number of possible:

- Residential curb deliveries
- Residential NDCBU deliveries
- Residential centralized deliveries
- Residential other deliveries
- Business curb deliveries
- Business NDCBU deliveries
- Business centralized
- Business other deliveries.

RESPONSE:

(a)

NUMBER OF 3-D ZIPS WITH CITY ROUTES BY AREA		
AREA	AREA NAME	NUMBER OF 3-D ZIP CODES WITH CITY ROUTES
A	New York Metro	43
B	Northeast	84
C	Allegheny	86
D	Mid-Atlantic	98
E	Western	110
F	Pacific	59
G	Southwest	91
H	Southeast	92
I	Midwest	142
J	Great Lakes	56
K	Capital Metro	22
TOTAL		883

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

NUMBER OF 5-D ZIP CODES WITH CITY ROUTES BY AREA		
AREA	AREA NAME	NUMBER OF 5-D ZIP CODES WITH CITY ROUTES
A	New York Metro	909
B	Northeast	979
C	Allegheny	1,359
D	Mid-Atlantic	810
E	Western	969
F	Pacific	1,047
G	Southwest	1,297
H	Southeast	1,395
I	Midwest	1,467
J	Great Lakes	1,009
K	Capital Metro	266
TOTAL		11,507

(b)

NUMBER OF CITY ROUTES BY AREA AND DELIVERY MODE			
AREA	AREA NAME	DELIVERY MODE	NUMBER OF CITY ROUTES
A	New York Metro	Curbline	1,638
A	New York Metro	Dismount	436
A	New York Metro	Foot	5,871
A	New York Metro	Other	65
A	New York Metro	Park & Loop	6,646
B	Northeast	Curbline	2,050
B	Northeast	Dismount	1,010
B	Northeast	Foot	2,445
B	Northeast	Other	70
B	Northeast	Park & Loop	8,182
C	Allegheny	Curbline	3,271
C	Allegheny	Dismount	473
C	Allegheny	Foot	2,988
C	Allegheny	Other	111
C	Allegheny	Park & Loop	11,386
D	Mid-Atlantic	Curbline	2,707
D	Mid-Atlantic	Dismount	879
D	Mid-Atlantic	Foot	534
D	Mid-Atlantic	Other	112
D	Mid-Atlantic	Park & Loop	4,290
E	Western	Curbline	4,330
E	Western	Dismount	3,967
E	Western	Foot	991
E	Western	Other	454
E	Western	Park & Loop	5,604

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

NUMBER OF CITY ROUTES BY AREA AND DELIVERY MODE			
AREA	AREA NAME	DELIVERY MODE	NUMBER OF CITY ROUTES
F	Pacific	Curbline	3,708
F	Pacific	Dismount	4,182
F	Pacific	Foot	1,569
F	Pacific	Other	219
F	Pacific	Park & Loop	14,461
G	Southwest	Curbline	4,342
G	Southwest	Dismount	2,483
G	Southwest	Foot	171
G	Southwest	Other	19
G	Southwest	Park & Loop	8,613
H	Southeast	Curbline	7,270
H	Southeast	Dismount	3,989
H	Southeast	Foot	424
H	Southeast	Other	140
H	Southeast	Park & Loop	5,935
I	Midwest	Curbline	3,191
I	Midwest	Dismount	417
I	Midwest	Foot	1,548
I	Midwest	Other	129
I	Midwest	Park & Loop	9,753
J	Great Lakes	Curbline	3,438
J	Great Lakes	Dismount	653
J	Great Lakes	Foot	1,802
J	Great Lakes	Other	199
J	Great Lakes	Park & Loop	11,107
K	Capital Metro	Curbline	767
K	Capital Metro	Dismount	663
K	Capital Metro	Foot	772
K	Capital Metro	Other	158
K	Capital Metro	Park & Loop	3,475
TOTAL			166,107

(c) ES.CNTL does not define route types as described in this interrogatory. The following route types are defined in ES.CNTL.

- Foot
- Residential Park & Loop and Mixed Park & Loop
- Residential Curb and Mixed Curb
- Business Motorized

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

The following answer is based upon these route types:

NUMBER OF ROUTES BY AREA AND ROUTE TYPE			
AREA	AREA NAME	ROUTE TYPE	NUMBER OF ROUTES
A	New York Metro	Foot	5,871
A	New York Metro	Residential Loop	6,206
A	New York Metro	Residential Curb	1,885
A	New York Metro	Mixed Loop	367
A	New York Metro	Mixed Curb	164
A	New York Metro	Business Motorized	163
B	Northeast	Foot	2,445
B	Northeast	Residential Loop	7,745
B	Northeast	Residential Curb	2,832
B	Northeast	Mixed Loop	376
B	Northeast	Mixed Curb	216
B	Northeast	Business Motorized	143
C	Allegheny	Foot	2,988
C	Allegheny	Residential Loop	10,820
C	Allegheny	Residential Curb	3,508
C	Allegheny	Mixed Loop	461
C	Allegheny	Mixed Curb	228
C	Allegheny	Business Motorized	224
D	Mid-Atlantic	Foot	534
D	Mid-Atlantic	Residential Loop	3,939
D	Mid-Atlantic	Residential Curb	3,329
D	Mid-Atlantic	Mixed Loop	297
D	Mid-Atlantic	Mixed Curb	297
D	Mid-Atlantic	Business Motorized	126
E	Western	Foot	991
E	Western	Residential Loop	5,155
E	Western	Residential Curb	7,823
E	Western	Mixed Loop	366
E	Western	Mixed Curb	522
E	Western	Business Motorized	489
F	Pacific	Foot	1,569
F	Pacific	Residential Loop	13,048
F	Pacific	Residential Curb	7,159
F	Pacific	Mixed Loop	1,090
F	Pacific	Mixed Curb	663
F	Pacific	Business Motorized	610
G	Southwest	Foot	171
G	Southwest	Residential Loop	7,902
G	Southwest	Residential Curb	5,955
G	Southwest	Mixed Loop	560
G	Southwest	Mixed Curb	545
G	Southwest	Business Motorized	495

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

NUMBER OF ROUTES BY AREA AND ROUTE TYPE (Continued)			
AREA	AREA NAME	ROUTE TYPE	NUMBER OF ROUTES
H	Southeast	Foot	424
H	Southeast	Residential Loop	5,190
H	Southeast	Residential Curb	10,274
H	Southeast	Mixed Loop	563
H	Southeast	Mixed Curb	821
H	Southeast	Business Motorized	486
I	Midwest	Foot	1,548
I	Midwest	Residential Loop	9,163
I	Midwest	Residential Curb	3,425
I	Midwest	Mixed Loop	455
I	Midwest	Mixed Curb	193
I	Midwest	Business Motorized	254
J	Great Lakes	Foot	1,802
J	Great Lakes	Residential Loop	10,521
J	Great Lakes	Residential Curb	3,849
J	Great Lakes	Mixed Loop	471
J	Great Lakes	Mixed Curb	320
J	Great Lakes	Business Motorized	236
K	Capital Metro	Foot	772
K	Capital Metro	Residential Loop	3,219
K	Capital Metro	Residential Curb	1,447
K	Capital Metro	Mixed Loop	214
K	Capital Metro	Mixed Curb	87
K	Capital Metro	Business Motorized	96
TOTAL			166,107

(d)

AVERAGE NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE						
AREA	AREA NAME	DELIVERY MODE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
A	New York Metro	Curbline	353	19	31	48
A	New York Metro	Dismount	76	38	79	139
A	New York Metro	Foot	3	366	6	181
A	New York Metro	Other	198	156	45	272
A	New York Metro	Park & Loop	23	62	26	286
B	Northeast	Curbline	312	24	23	43
B	Northeast	Dismount	66	58	33	178
B	Northeast	Foot	1	120	7	231
B	Northeast	Other	25	80	21	54
B	Northeast	Park & Loop	28	64	18	293
C	Allegheny	Curbline	315	32	36	47
C	Allegheny	Dismount	80	79	77	152
C	Allegheny	Foot	10	77	7	341
C	Allegheny	Other	55	45	28	118
C	Allegheny	Park & Loop	36	58	19	315

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

AVERAGE NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE (Continued)						
AREA	AREA NAME	DELIVERY MODE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
D	Mid-Atlantic	Curbline	360	47	61	50
D	Mid-Atlantic	Dismount	121	101	79	151
D	Mid-Atlantic	Foot	113	49	49	230
D	Mid-Atlantic	Other	183	117	152	86
D	Mid-Atlantic	Park & Loop	62	60	51	307
E	Western	Curbline	308	72	96	49
E	Western	Dismount	44	123	135	154
E	Western	Foot	71	95	59	184
E	Western	Other	45	154	107	120
E	Western	Park & Loop	48	85	45	272
F	Pacific	Curbline	321	40	59	54
F	Pacific	Dismount	62	124	128	142
F	Pacific	Foot	23	189	19	170
F	Pacific	Other	97	138	83	76
F	Pacific	Park & Loop	20	123	32	260
G	Southwest	Curbline	364	66	56	42
G	Southwest	Dismount	61	242	105	66
G	Southwest	Foot	10	25	20	249
G	Southwest	Other	46	221	35	187
G	Southwest	Park & Loop	42	87	29	313
H	Southeast	Curbline	390	49	51	37
H	Southeast	Dismount	85	227	107	89
H	Southeast	Foot	96	105	32	170
H	Southeast	Other	144	115	78	81
H	Southeast	Park & Loop	79	108	47	237
I	Midwest	Curbline	303	53	48	35
I	Midwest	Dismount	67	164	70	66
I	Midwest	Foot	28	68	14	272
I	Midwest	Other	75	77	19	109
I	Midwest	Park & Loop	42	73	21	295
J	Great Lakes	Curbline	320	41	38	32
J	Great Lakes	Dismount	67	140	83	64
J	Great Lakes	Foot	12	151	6	223
J	Great Lakes	Other	78	47	46	122
J	Great Lakes	Park & Loop	27	85	13	288
K	Capital Metro	Curbline	267	21	51	27
K	Capital Metro	Dismount	36	241	121	62
K	Capital Metro	Foot	32	149	30	158
K	Capital Metro	Other	48	111	49	98
K	Capital Metro	Park & Loop	29	115	39	206

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

(d) Continued

AVERAGE NUMBER OF POSSIBLE BUSINESS DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE						
AREA	AREA NAME	DELIVERY MODE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
A	New York Metro	Curbline	5	1	3	21
A	New York Metro	Dismount	2	4	4	52
A	New York Metro	Foot	0	3	0	50
A	New York Metro	Other	2	4	1	45
A	New York Metro	Park & Loop	0	2	1	30
B	Northeast	Curbline	6	2	2	14
B	Northeast	Dismount	2	5	3	39
B	Northeast	Foot	0	5	1	39
B	Northeast	Other	1	10	1	14
B	Northeast	Park & Loop	1	2	1	30
C	Allegheny	Curbline	8	1	2	18
C	Allegheny	Dismount	4	4	5	61
C	Allegheny	Foot	0	2	1	42
C	Allegheny	Other	1	6	2	48
C	Allegheny	Park & Loop	1	1	1	29
D	Mid-Atlantic	Curbline	10	1	3	24
D	Mid-Atlantic	Dismount	6	7	4	69
D	Mid-Atlantic	Foot	2	2	1	64
D	Mid-Atlantic	Other	11	6	9	57
D	Mid-Atlantic	Park & Loop	3	2	2	45
E	Western	Curbline	9	2	6	19
E	Western	Dismount	2	4	7	35
E	Western	Foot	3	6	5	55
E	Western	Other	2	7	14	25
E	Western	Park & Loop	2	3	3	32
F	Pacific	Curbline	5	2	6	16
F	Pacific	Dismount	3	6	11	40
F	Pacific	Foot	0	8	3	62
F	Pacific	Other	2	13	13	37
F	Pacific	Park & Loop	1	4	3	34
G	Southwest	Curbline	7	2	4	25
G	Southwest	Dismount	4	14	8	57
G	Southwest	Foot	0	8	1	83
G	Southwest	Other	1	9	0	91
G	Southwest	Park & Loop	2	3	2	43
H	Southeast	Curbline	9	2	5	26
H	Southeast	Dismount	3	8	9	43
H	Southeast	Foot	3	7	4	63
H	Southeast	Other	7	9	7	52
H	Southeast	Park & Loop	3	5	3	48

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

AVERAGE NUMBER OF POSSIBLE BUSINESS DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE (Continued)						
AREA	AREA NAME	DELIVERY MODE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
I	Midwest	Curbline	6	2	2	19
I	Midwest	Dismount	3	7	3	57
I	Midwest	Foot	1	3	1	54
I	Midwest	Other	2	4	1	38
I	Midwest	Park & Loop	2	2	1	34
J	Great Lakes	Curbline	10	2	2	20
J	Great Lakes	Dismount	7	6	3	48
J	Great Lakes	Foot	1	3	1	48
J	Great Lakes	Other	6	5	2	18
J	Great Lakes	Park & Loop	2	1	1	29
K	Capital Metro	Curbline	2	1	2	15
K	Capital Metro	Dismount	1	3	3	27
K	Capital Metro	Foot	1	4	1	41
K	Capital Metro	Other	1	3	2	32
K	Capital Metro	Park & Loop	1	1	1	25

(e) As noted in subsection (c), above, ES.CNTL does not define route types as described in this interrogatory. The following route types are defined in ES.CNTL.

- Foot
- Residential Park & Loop and Mixed Park & Loop
- Residential Curb and Mixed Curb
- Business Motorized

The following answer is based upon these route types:

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
A	New York Metro	Foot	15,182	2,149,442	35,656	1,060,072
A	New York Metro	Residential Loop	146,625	403,336	170,740	1,850,495
A	New York Metro	Residential Curb	605,626	54,412	83,577	150,590
A	New York Metro	Mixed Loop	5,887	11,198	4,785	50,475
A	New York Metro	Mixed Curb	18,507	2,905	3,897	6,087

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
A	New York Metro	Business Motorized	793	500	150	1,584
B	Northeast	Foot	3,569	293,461	16,342	564,719
B	Northeast	Residential Loop	224,495	500,662	144,621	2,350,339
B	Northeast	Residential Curb	689,978	105,308	78,932	257,201
B	Northeast	Mixed Loop	6,702	21,042	4,880	48,172
B	Northeast	Mixed Curb	17,689	7,223	3,059	13,652
B	Northeast	Business Motorized	656	775	286	1,417
C	Allegheny	Foot	31,094	230,205	22,371	1,020,270
C	Allegheny	Residential Loop	402,434	640,354	215,600	3,531,011
C	Allegheny	Residential Curb	1,053,080	140,612	151,725	228,620
C	Allegheny	Mixed Loop	11,417	22,802	5,417	57,093
C	Allegheny	Mixed Curb	21,265	6,943	4,814	9,124
C	Allegheny	Business Motorized	1,230	502	46	1,693
D	Mid-Atlantic	Foot	60,184	26,357	26,087	122,667
D	Mid-Atlantic	Residential Loop	256,375	243,649	209,764	1,271,769
D	Mid-Atlantic	Residential Curb	1,072,196	214,431	238,975	256,874
D	Mid-Atlantic	Mixed Loop	9,240	12,817	8,204	44,884
D	Mid-Atlantic	Mixed Curb	29,335	13,466	13,093	19,845
D	Mid-Atlantic	Business Motorized	803	1,127	390	1,439
E	Western	Foot	70,254	94,110	58,191	181,869
E	Western	Residential Loop	259,961	452,101	245,963	1,479,582
E	Western	Residential Curb	1,494,313	830,992	974,284	844,343
E	Western	Mixed Loop	10,096	24,828	8,651	45,699
E	Western	Mixed Curb	30,726	36,562	23,768	31,298
E	Western	Business Motorized	1,950	2,302	1,024	3,326
F	Pacific	Foot	36,109	296,309	29,798	266,889

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
F	Pacific	Residential Loop	272,420	1,699,032	451,201	3,632,090
F	Pacific	Residential Curb	1,421,799	652,120	747,487	765,773
F	Pacific	Mixed Loop	17,230	82,612	18,401	130,235
F	Pacific	Mixed Curb	48,677	41,540	25,461	40,763
F	Pacific	Business Motorized	1,803	3,235	1,065	4,719
G	Southwest	Foot	1,710	4,314	3,405	42,572
G	Southwest	Residential Loop	352,422	717,600	244,549	2,604,863
G	Southwest	Residential Curb	1,690,876	844,689	488,045	316,355
G	Southwest	Mixed Loop	12,294	33,875	7,174	88,180
G	Southwest	Mixed Curb	40,819	44,186	14,315	29,416
G	Southwest	Business Motorized	2,373	2,080	1,014	4,565
H	Southeast	Foot	40,750	44,485	13,457	72,167
H	Southeast	Residential Loop	440,764	606,160	265,931	1,347,272
H	Southeast	Residential Curb	3,094,629	1,228,065	782,719	594,208
H	Southeast	Mixed Loop	28,460	32,958	12,463	60,139
H	Southeast	Mixed Curb	93,421	46,375	29,060	38,401
H	Southeast	Business Motorized	3,890	2,375	916	3,242
I	Midwest	Foot	43,426	105,840	21,371	421,436
I	Midwest	Residential Loop	399,364	689,560	199,155	2,821,089
I	Midwest	Residential Curb	986,364	237,705	180,719	148,324
I	Midwest	Mixed Loop	10,172	25,847	5,600	59,265
I	Midwest	Mixed Curb	17,007	9,301	4,866	5,170
I	Midwest	Business Motorized	658	716	52	814

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE (Continued)						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
J	Great Lakes	Foot	21,873	271,741	11,238	401,499
J	Great Lakes	Residential Loop	294,655	916,556	140,554	3,139,346
J	Great Lakes	Residential Curb	1,125,373	231,512	187,205	164,506
J	Great Lakes	Mixed Loop	10,298	22,132	3,714	54,687
J	Great Lakes	Mixed Curb	33,597	10,969	5,704	10,388
J	Great Lakes	Business Motorized	1,112	624	39	903
K	Capital Metro	Foot	24,351	115,379	23,430	122,152
K	Capital Metro	Residential Loop	94,234	391,118	131,760	696,736
K	Capital Metro	Residential Curb	229,683	188,667	124,839	74,048
K	Capital Metro	Mixed Loop	5,479	8,132	5,113	16,972
K	Capital Metro	Mixed Curb	6,249	5,085	2,243	2,779
K	Capital Metro	Business Motorized	308	112	66	770
TOTAL			17,456,311	16,157,430	6,939,421	33,688,942

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE BUSINESS DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
A	New York Metro	Foot	220	16,569	1,789	292,148
A	New York Metro	Residential Loop	2,083	6,188	4,595	139,722
A	New York Metro	Residential Curb	5,725	1,797	3,265	30,505
A	New York Metro	Mixed Loop	700	3,204	1,991	45,443
A	New York Metro	Mixed Curb	2,188	1,438	2,250	18,140
A	New York Metro	Business Motorized	725	1,904	1,060	22,386
B	Northeast	Foot	164	12,216	1,583	94,860
B	Northeast	Residential Loop	7,354	12,257	7,327	196,256
B	Northeast	Residential Curb	10,795	4,263	4,724	43,085
B	Northeast	Mixed Loop	2,262	6,009	2,860	43,833
B	Northeast	Mixed Curb	3,635	3,527	3,027	20,090
B	Northeast	Business Motorized	746	3,311	1,172	13,978
C	Allegheny	Foot	830	5,025	2,023	125,790
C	Allegheny	Residential Loop	13,907	6,797	6,746	267,380
C	Allegheny	Residential Curb	22,920	3,116	6,382	56,652
C	Allegheny	Mixed Loop	1,969	3,232	1,704	56,343
C	Allegheny	Mixed Curb	3,287	2,283	2,798	23,607
C	Allegheny	Business Motorized	839	2,071	704	25,216
D	Mid-Atlantic	Foot	1,090	1,077	538	34,041
D	Mid-Atlantic	Residential Loop	9,445	3,919	5,093	138,735
D	Mid-Atlantic	Residential Curb	26,666	4,073	8,240	79,722
D	Mid-Atlantic	Mixed Loop	2,544	2,415	2,739	46,142
D	Mid-Atlantic	Mixed Curb	5,467	4,579	3,708	41,150
D	Mid-Atlantic	Business Motorized	533	3,061	1,324	21,238

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

TOTAL NUMBER OF POSSIBLE BUSINESS DELIVERIES BY AREA AND ROUTE TYPE (Continued)						
AREA	AREA NAME	ROUTE TYPE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
E	Western	Foot	3,259	5,760	4,498	54,206
E	Western	Residential Loop	9,725	7,574	10,192	119,006
E	Western	Residential Curb	33,554	13,131	35,512	129,810
E	Western	Mixed Loop	3,035	5,013	4,608	52,128
E	Western	Mixed Curb	9,237	7,495	15,890	59,330
E	Western	Business Motorized	4,055	11,916	9,067	54,418
F	Pacific	Foot	753	13,158	4,574	97,414
F	Pacific	Residential Loop	5,532	26,129	23,372	299,247
F	Pacific	Residential Curb	19,806	14,287	36,380	119,076
F	Pacific	Mixed Loop	1,822	19,496	17,116	139,830
F	Pacific	Mixed Curb	7,293	11,961	24,304	77,789
F	Pacific	Business Motorized	2,836	15,866	14,820	84,555
G	Southwest	Foot	35	1,405	146	14,135
G	Southwest	Residential Loop	12,524	12,215	10,340	267,686
G	Southwest	Residential Curb	31,405	14,660	21,811	149,943
G	Southwest	Mixed Loop	2,566	7,024	4,233	83,938
G	Southwest	Mixed Curb	7,278	12,670	11,505	63,896
G	Southwest	Business Motorized	1,497	22,983	6,126	55,715
H	Southeast	Foot	1,317	3,092	1,586	26,903
H	Southeast	Residential Loop	12,180	11,984	9,936	182,301
H	Southeast	Residential Curb	59,595	20,379	40,102	241,802
H	Southeast	Mixed Loop	3,349	10,186	5,075	79,768
H	Southeast	Mixed Curb	12,584	15,199	22,058	97,148
H	Southeast	Business Motorized	3,991	18,868	10,098	54,463
I	Midwest	Foot	1,236	4,136	1,061	83,026
I	Midwest	Residential Loop	14,875	9,006	6,652	260,888
I	Midwest	Residential Curb	18,747	4,334	5,320	59,823
I	Midwest	Mixed	2,268	5,870	2,405	57,690
I	Midwest	Mixed Curb	2,701	2,354	1,952	18,273
I	Midwest	Business Motorized	659	3,779	1,000	21,011
J	Great Lakes	Foot	1,162	4,601	931	85,965
J	Great Lakes	Residential Loop	14,089	10,117	4,799	264,558

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE BUSINESS DELIVERIES BY AREA AND ROUTE TYPE (Continued)						
AREA	AREA NAME	ROUTE TYPE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
J	Great Lakes	Residential Curb	30,384	5,820	6,341	66,190
J	Great Lakes	Mixed Loop	2,920	4,908	1,868	50,475
J	Great Lakes	Mixed Curb	6,912	3,176	2,748	30,373
J	Great Lakes	Business Motorized	1,595	2,662	536	18,431
K	Capital Metro	Foot	466	2,789	814	31,449
K	Capital Metro	Residential Loop	1,630	2,691	1,640	56,331
K	Capital Metro	Residential Curb	1,882	1,260	2,304	20,790
K	Capital Metro	Mixed Loop	436	1,815	1,212	24,060
K	Capital Metro	Mixed Curb	405	1,128	1,225	8,747
K	Capital Metro	Business Motorized	18	1,322	655	10,201
TOTAL			477,707	488,550	464,454	5,649,250

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-8. Please confirm that ALDRAN.FOS.STS.SAS.DATA contains observations taken during PQs 1, 2, and 3 of PFY 1996 and PQs 1 and 2 of PFY 1998. If this is incorrect, please identify the period over which the data set was collected.

RESPONSE:

Not confirmed. ALDRAN.FOS.STS.DATA contains observations taken from PFY 1997

- QTR 1 through PFY 1998 - QTR 3.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-9. Please refer to your Testimony at page 13, lines 2-4, at which you reject the Crowder analysis "precisely because $g(V/S)$ is a very poor approximation of \bar{L} due to substantial non-linearity in the load-time regressions." Please identify which load-time regressions are being referred to here and who performed these regressions, on which data and when.

RESPONSE:

The load-time regressions being referred to are the regressions estimated by the Postal Rate Commission in Docket No. R90-1, PRC Lib Ref 9, Analysis of Variability for City Delivery Carrier Street Load Time (Part III of III), Workpaper 5. The Commission used data from the LTV.FLAT.DATA file referred to in question 1 to produce the regressions. These data were obtained from the 1985 load time test.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-10. Please refer to your Testimony at page 13, lines 2-4. Please provide precise scientific definitions for the following expressions, in terms of statistical methods and measurement:

(a) $g(V/S)$ is a "very poor approximation."

(b) "substantial non-linearity."

RESPONSE:

(a) In its Docket No. R97-1 Decision at page 179, paragraph 3284, the Postal Rate Commission stated:

It is true that models that use average values for the independent variable under investigation are only approximations of models that attempt to account for the specific distribution pattern of the independent variable across a sample. They are close approximations, however, where the function is well behaved. The elemental variability function is such a function.

I have added emphasis to the words "close approximations" in this quotation. My intended definition of the term "close approximation" is the same definition that the Commission is using in this quotation. Since the Commission did not explicitly state a definition based on "statistical methods and measurement," I infer that it was choosing to apply the common dictionary definition of the term "close approximation."

Accordingly, I choose to interpret "close approximation" as meaning "almost identical" or "almost equal."¹

The reason this is important is that I also interpret the term "very poor approximation" as meaning "not a close approximation," or "nowhere near a close approximation." Thus, my statement that $g(V/S)$ is a very poor approximation of \bar{L} is a

¹ The American Heritage Dictionary of the English Language, s.v. "approximate."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

statement that $g(V/S)$ is not a close approximation of \bar{L} , meaning, specifically, that $g(V/S)$ is not almost identical to, or not almost equal to \bar{L} .

(b) Within the context of my statement in lines 2-4 at page 13 of my Testimony, the non-linearity of each regression equation means that in the neighborhood of $(\bar{V}_L, \bar{V}_F, \bar{V}_P, \bar{V}_C)$, where \bar{V}_L is average letters per stop, \bar{V}_F is average flats per stop, \bar{V}_P is average parcels per stop, and \bar{V}_C is average collections per stop, and where $g(V/S)$ can be viewed as load time predicted at these average volumes per stop, the regression is strictly concave or strictly convex. Linear equations are, by definition, neither strictly concave nor strictly convex. Substantial non-linearity means that the degree of the strict concavity or convexity is too large to justify concluding that there is no strict concavity or strict convexity. For definitions of strict concavity and convexity, see Alpha C. Chang, Fundamental Methods of Mathematical Economics, McGraw-Hill Book Company, 3rd Edition, 1984, at 340-348. The concept of a neighborhood as used in my reference to a neighborhood of $(\bar{V}_L, \bar{V}_F, \bar{V}_P, \bar{V}_C)$ is the same concept as that used by Alpha C. Chang at page 206 of this citation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-12. Please identify what your usual statistical acceptance "rules of thumb" are for test statistics in your econometric/regression work for the USPS, for:

- (a) F-test
- (b) t-test
- (c) adjusted coefficient of determination, and
- (f) other relevant test statistics (please list).

RESPONSE:

- (a) An F value that is high enough to fall within the upper 5% tail of the F distribution is sufficiently high to justify rejection of the null hypothesis that the coefficients of the relevant set of regressors being tested are jointly zero.
- (b) A t value that is high enough to fall within the upper or lower 5% tails of the t distribution is sufficient to justify rejection of the null hypothesis that the coefficient of the regressor being tested is zero.
- (c) I do not recognize any "rule of thumb" regarding the adjusted coefficient of determination. Sometimes analysts use regressions with low adjusted coefficients of determination. They may regard these regressions as valid because the estimated coefficients for the regressors in the model have very high t statistics, and because the missing variables that would explain the large unexplained variation still remaining are considered to be uncorrelated with the existing regressors. Conversely, analysts sometimes reject regressions that have high adjusted coefficients of determination. They may do so because they regard the estimated coefficients for the regressors that are most critical to their investigation as

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

**counterintuitive, operationally indefensible, or statistically unreliable. There may be
other reasons as well.**

**(d) I cannot answer without further specification of the other relevant statistics for which
you want me to provide rules of thumb.**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-13. Please refer to your Testimony at page 17, lines 13-15, where

you describe a 2.61% discrepancy between \bar{L} and \hat{g} (V/S) as being a liberal interpretation of the linearity assumption. Please state what you would have considered a "good fit" (e.g. 1.00%), and why.

RESPONSE:

As I also observed at page 17, lines 13-15 of my Testimony, the 2.61% discrepancy equates to a \$21,000,000 discrepancy. I would regard a discrepancy of less than \$1,000,000 as small enough to justify interpreting the regression as a sufficiently close approximation to a linear equation to justify using it as such.

This choice of \$1,000,000 as the cutoff point is strictly my professional judgment.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-TI2-14. Please refer to your Testimony at page 26 and footnote 35. If you were to eliminate the RUNUM variable from the quadratic equation (12), how would you expect the elasticities, t-statistics and other test results to change, if at all?

RESPONSE:

It is not clear whether the premise of this question is that I would (1) first eliminate the RUNUM variable and then reestimate the regression on the remaining regressors, or (2) view those RUNUM coefficients that have high standard errors as equaling zero, and then recalculate elasticities using the remaining regression terms, as currently estimated. Footnote 35 on page 26 of my Testimony discusses only the second of these two options. Under this second premise, the t-statistics and other test results would not change; the elasticities would change by very small amounts.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-15. Please state whether a test run such as that mentioned in question 14 has been performed by you or others on either quadratic (12) or interaction model (13). If affirmative, please state what the results were and they affected the elasticity estimates.

RESPONSE:

Having assumed that the second premise of my answer to question 14 is correct, I reestimated the elasticities after setting "high-standard-error" RUNUM coefficients equal to zero. The new elasticity estimates are shown in the table below next to my proposed elasticity estimates, which are the ones presented in Docket No. R97-1, USPS-T-17 at page 62 and USPS LR-H-141 at pages 13, 56, and 77. Observe that new estimates are calculated for only curb and foot routes. Since all the RUNUM coefficients in the park & loop equation are statistically significant, none of these coefficients is set equal to zero.

Route Group	Stop Type	Proposed Elasticity Estimates	Elasticity Estimates Derived After Setting RUNUM Coefficients with High Standard Errors Equal to Zero
CURB	SDR	.494	.492
CURB	MDR	.487	.484
CURB	BAM	.498	.495
FOOT	SDR	.596	.593
FOOT	MDR	.597	.595
FOOT	BAM	.598	.596

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-16. Please refer to your testimony at page 27, lines 17-19. Please state whether it is your view that the use of the variable RUNUM*RTYPEj is wholly responsible for the "negative, unrealistically low, or unrealistically high" route specific elasticities you describe, or whether there exist other factors besides equation design and variable choice that might be relevant here. If other factors besides equation design and variable choice are relevant, please state which factors and why.

RESPONSE:

I believe the reason numerous route-specific elasticities are operationally implausible is that the interactions model uses only five or fewer data points to estimate a separate set of three regression coefficients for each individual route -- one coefficient for the intercept, one for the STOPS variable, and one for the STOPS² variable. The substantial loss of degrees of freedom resulting from this use of only five or fewer data points per set of three coefficients virtually guarantees unstable and imprecise coefficient estimates. This imprecision is, in turn, translated into highly unreliable estimates for the route-specific derivatives and running times, and for the elasticities derived from those derivatives and running times.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-18. Please refer to your Testimony at page 33, footnote 43, at which you state that: "the A.T. Kearney study recommended that the Postal Service consider using these data to update its segment 7 cost analysis." Please state whether you are referring to recommendation 12 on page 56 of the Data Quality Study, Technical Report #4, April 16, 1999. If affirmative, please specify your interpretation of this recommendation.

RESPONSE:

I am referring to the recommendations made on pages 55-56 of the Data Quality Study, Technical Report # 4, April 16, 1999. These recommendations include, but are not limited to the recommendation 12 on page 56. I am interpreting the entire discussion on pages 55 and 56 as constituting a proposal that the Postal Service seriously consider using the Delivery Redesign data in its Segment 7 cost analyses as soon as those data become available.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-19. Please state whether you have reviewed the process by which the Engineered Standards/Delivery Redesign project chose which city routes from which to collect data.

RESPONSE:

I have reviewed this process to the extent that I have read Mr. Raymond's testimony (USPS-T-13) and supporting documentation that were filed as part of Docket No.

R2000-1.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-20. Please refer to your Testimony at page 35, lines 4-6, at which you state that your weighting of the observations for each ES route "ensures that each ES route properly represents the ZIP code from which it was selected."

- (a) Please provide all information available to demonstrate that the ZIP codes observed are representative of the entire system of routes.
- (b) Please state whether you have attempted to develop sample weights for each of the observed ZIP codes. If affirmative, please explain all such attempts.

RESPONSE:

- (a) The first two rows of the following table show two sets of average possible deliveries per route by delivery type category. The first set consists of average possible deliveries per route by delivery type just for the 336 ES routes within the 76 five-digit ZIP codes included in the ES database. The second set consists of average possible deliveries per route for all 166,107 routes in the FY 1997 – Qtr 4 Version of the Carrier Route Maintenance File (CRMF). The last two rows of the table show corresponding percentages. The percentage in each cell equals the ratio of average possible delivery for a given delivery type category over the sum of these averages over all such categories.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

Average Possible Deliveries Per Route by Delivery Type Category

Routes	Residential Curb	Residential NDCBU	Residential Centralized	Residential Other	Business Curb	Business NCDBU	Business Centralized	Business Other
336 Sampled Routes in the ES Data Base	138	66	75	158	3	5	4	35
166,107 Routes in the FY 97 - Qtr 4 CRMF Data Base	105	42	97	203	3	3	3	34
336 Sampled Routes in the ES Data Base	28.5%	13.6%	15.5%	32.6%	0.7%	1.0%	0.9%	7.2%
166,107 Routes in the FY 97 - Qtr 4 CRMF Data Base	21.5%	8.5%	19.9%	41.4%	0.6%	0.6%	0.6%	6.9%

(b) I have not attempted to develop ZIP-Code level weights.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-21. As to each of the 76 5-D zips that were sampled to develop the new Engineered Standards (ES) database, please provide the zip code number and the USPS region within which it is located.

RESPONSE:

ZIP5.	AREA	AREA NAME
731	A	New York Metro
8619	A	New York Metro
8629	A	New York Metro
8648	A	New York Metro
10019	A	New York Metro
1106	B	Northeast
1118	B	Northeast
1606	B	Northeast
19380	C	Allegheny
19382	C	Allegheny
45215	C	Allegheny
45241	C	Allegheny
45242	C	Allegheny
45249	C	Allegheny
23455	D	Mid-Atlantic
27408	D	Mid-Atlantic
89014	E	Western
89015	E	Western
98011	E	Western
98310	E	Western
98312	E	Western
98337	E	Western
90247	F	Pacific
90248	F	Pacific
90249	F	Pacific
91761	F	Pacific
91764	F	Pacific
94122	F	Pacific
94611	F	Pacific
96001	F	Pacific
96002	F	Pacific
96003	F	Pacific
72204	G	Southwest
75067	G	Southwest
75080	G	Southwest
75093	G	Southwest
75228	G	Southwest
76119	G	Southwest
78227	G	Southwest
78242	G	Southwest
30087	H	Southeast
31904	H	Southeast

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

ZIP5	AREA	AREA NAME
32304	H	Southeast
32310	H	Southeast
34616	H	Southeast
34621	H	Southeast
34624	H	Southeast
36201	H	Southeast
36207	H	Southeast
39206	H	Southeast
39216	H	Southeast
53208	I	Midwest
53214	I	Midwest
53223	I	Midwest
63301	I	Midwest
63303	I	Midwest
67209	I	Midwest
67212	I	Midwest
68114	I	Midwest
68124	I	Midwest
47803	J	Great Lakes
47804	J	Great Lakes
48035	J	Great Lakes
48036	J	Great Lakes
48043	J	Great Lakes
48044	J	Great Lakes
48045	J	Great Lakes
48184	J	Great Lakes
49201	J	Great Lakes
49202	J	Great Lakes
49203	J	Great Lakes
60606	J	Great Lakes
20003	K	Capital Metro
20024	K	Capital Metro
20737	K	Capital Metro
20782	K	Capital Metro

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-24. As to each of the route delivery modes described in question 22, please provide the average number of:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Residential centralized deliveries
- (e) Residential other deliveries
- (f) Business curb deliveries
- (g) Business NDCBU deliveries
- (h) Business centralized deliveries
- (i) Business other deliveries.

RESPONSE:

Delivery Mode	Residential Curb	Residential NDCBU	Residential Centralized	Residential Other	Business Curb	Business NDCBU	Business Centralized	Business Other
Curbline	339	53	47	42	8	4	2	21
Dismount	66	110	158	119	3	8	7	44
Foot	18	14	190	224	1	1	4	46
Other	81	73	114	110	3	7	7	34
Park & Loop	37	28	85	284	1	2	2	34

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-25. As to each route type identified by you in response to question number 23, please also provide the average number of possible:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Residential centralized deliveries
- (d) Residential other deliveries
- (e) Business curb deliveries
- (f) Business NDCBU deliveries
- (g) Business centralized deliveries
- (h) Business other deliveries.

RESPONSE:

Route Type	Residential Curb	Residential NDCBU	Residential Centralized	Residential Other	Business Curb	Business NDCBU	Business Centralized	Business Other
Foot	18	14	190	224	1	1	4	49
Residential Loop	38	29	88	298	1	1	1	26
Residential Curb	262	78	92	74	5	3	2	19
Mixed Loop	24	16	57	128	5	9	13	130
Mixed Curb	88	32	55	51	15	23	16	113
Business Motorized	5	2	4	7	5	14	26	115

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-26. As to each of the 340 ES routes sampled, please provide

(a) the appropriate "unit code," as used on the LR I-163 ES database;

(b) the USPS region in which it is located;

(c) per ES.CNTL, the number of possible:

- . Residential curb deliveries
- . Residential NDCBU deliveries
- . Residential centralized deliveries
- . Residential other deliveries
- . Business curb deliveries
- . Business NDCBU deliveries
- . Business centralized deliveries
- . Business other deliveries.

(d) per ES.CNTL, its primary mode of delivery;

(e) its type classification by ES.CNTL (as foot, business motorized, residential P&L, etc.); and

(f) its sample weight.

RESPONSE:

The requested data are reported in the Excel workbook MPA26.xls, which has been included in a new library reference, USPS LR-I-219, to be filed shortly. Note that the four ES routes that were excluded from the calculation of street-time percentages in USPS LR-I-159 are listed in the last four rows of this new Excel file.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-27. Please provide the ES unit code and route number for the four sampled routes which were eliminated from your analysis because they could not be located on the City Carrier Route master File.

RESPONSE:

These unit codes and route numbers are reported on the Excel workbook MPA26.xls, which has been included in a new library reference, USPS LR-I-219, to be filed shortly.

The codes and route numbers for the four missing routes are reported in the last four rows of this workbook.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-28. Please refer to Library Reference LR-I-159, and therein to the description of the ALDRAN.FOS.STS.SAS.DATA set, where it indicates that there were 24 variables, one of which is route type. Please also refer to Library Reference LR I-163, and therein, where it states that there are 20 variables and no route type is indicated. Please state whether:

- (a) Was there a route-type variable in the original Engineering Standards (ES) data base?
- (b) If so, why it was deleted in LR-I-163?

RESPONSE:

- (a) Yes
- (b) It was considered less important than the variables that were included in LR-I-163.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-29. Please explain, for purposes of designating route type for each sampled ES route and processing the ES tallies, whether the ES database designation was retained throughout the ES.CNTL SAS run or whether the route type was designated by ES.CNTL.SAS, using the route type assigned to the routes in ALDRAN.HQ059TOI.CITY.PQFY97.

RESPONSE:

ES.CNTL does not use the route type reported for each route on the ES database file ALDRAN.FOS.STS.SAS.DATA in order to assign routes to the six STS route-type categories. Instead, ES.CNTL defines an alternative route type variable based on values for delivery mode and numbers of possible deliveries by type. It obtains these delivery mode and possible delivery observations from the data set ALDRAN.HQ059T01.CITY.PQ4FY97. Lines 104 through 122 of the ES.CNTL program code allocates ES routes across the six route-type categories based on combinations of delivery mode and relative numbers of possible deliveries. These lines can be found on page 9 of USPS LR-I-159.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-30. Please provide the original ES database route-type variable for each observed route.

RESPONSE:

The following table reports the route type for each ES route as recorded on the ES database file ALDRAN.FOS.STS.SAS.DATA.

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
1	731	4	FOOT	1
2	731	25	RES LOOP	2
3	731	41	RES CURB	3
4	1106	12	RES LOOP	2
5	1106	18	RES LOOP	2
6	1118	42	RES CURB	3
7	1606	3	RES LOOP	2
8	1606	7	RES LOOP	2
9	1606	23	RES LOOP	2
10	8619	8	RES CURB	3
11	8619	26	RES LOOP	2
12	8619	28	RES LOOP	2
13	8629	12	RES LOOP	2
14	8629	34	FOOT	1
15	8629	47	FOOT	1
16	8648	46	RES LOOP	2
17	8648	80	RES LOOP	2
18	10019	46	FOOT	1
19	19380	8	RES LOOP	2
20	19380	44	RES CURB	3
21	19382	29	RES LOOP	2
22	20003	5	RES LOOP	2
23	20003	20	RES LOOP	2
24	20024	2	RES LOOP	2
25	20024	17	RES LOOP	2
26	20737	4	RES LOOP	2
27	20737	7	RES LOOP	2
28	20737	9	RES LOOP	2
29	20737	16	RES LOOP	2
30	20782	12	RES LOOP	2
31	20782	17	RES LOOP	2
32	20782	18	RES LOOP	2
33	20782	21	RES LOOP	2
34	23455	46	RES LOOP	2
35	23455	66	RES CURB	3

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
36	27408	1	RES LOOP	2
37	27408	2	RES LOOP	2
38	27408	3	RES LOOP	2
39	27408	6	RES LOOP	2
40	27408	7	RES CURB	3
41	27408	8	RES LOOP	2
42	27408	9	RES LOOP	2
43	27408	11	MIX LOOP	4
44	27408	15	RES LOOP	2
45	27408	16	RES LOOP	2
46	27408	17	RES LOOP	2
47	27408	19	RES LOOP	2
48	27408	20	RES LOOP	2
49	27408	21	MIX LOOP	4
50	27408	22	RES CURB	3
51	27408	23	RES LOOP	2
52	27408	24	RES LOOP	2
53	27408	25	RES CURB	3
54	27408	27	MIX LOOP	4
55	27408	28	RES LOOP	2
56	27408	30	RES LOOP	2
57	27408	31	RES LOOP	2
58	27408	32	MIX LOOP	4
59	30087	1	MIX CURB	5
60	30087	2	RES CURB	3
61	30087	3	RES CURB	3
62	30087	5	RES CURB	3
63	30087	11	RES CURB	3
64	30087	14	RES CURB	3
65	30087	17	RES CURB	3
66	30087	26	RES CURB	3
67	30087	27	RES CURB	3
68	30087	29	RES CURB	3
69	30087	35	RES CURB	3
70	30087	36	RES CURB	3
71	30087	39	RES LOOP	2
72	30087	44	RES CURB	3
73	30087	47	RES CURB	3
74	30087	48	RES CURB	3
75	30087	56	RES CURB	3
76	30087	59	RES LOOP	2
77	30087	70	RES CURB	3
78	31904	11	RES LOOP	2
79	31904	24	RES CURB	3
80	31904	32	RES LOOP	2
81	31904	74	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
82	32304	5	RES LOOP	2
83	32304	67	RES LOOP	2
84	32304	98	RES LOOP	2
85	32310	49	RES CURB	3
86	34616	20	RES CURB	3
87	34616	32	RES CURB	3
88	34616	38	RES LOOP	2
89	34621	55	RES CURB	3
90	34621	60	RES LOOP	2
91	34621	67	RES CURB	3
92	34621	69	RES LOOP	2
93	34624	51	RES LOOP	2
94	34624	65	RES LOOP	2
95	34624	69	RES CURB	3
96	36201	1	MIX LOOP	4
97	36201	2	BUS MOTOR	6
98	36207	11	RES LOOP	2
99	36207	16	RES CURB	3
100	39206	11	RES LOOP	2
101	39206	21	RES LOOP	2
102	39216	5	BUS MOTOR	6
103	39216	6	RES LOOP	2
104	45215	58	RES LOOP	2
105	45215	60	RES LOOP	2
106	45215	69	RES LOOP	2
107	45215	79	RES LOOP	2
108	45215	81	RES LOOP	2
109	45215	95	RES LOOP	2
110	45241	4	RES LOOP	2
111	45241	6	RES LOOP	2
112	45241	11	RES LOOP	2
113	45241	14	RES LOOP	2
114	45241	26	RES LOOP	2
115	45242	7	RES LOOP	2
116	45242	11	RES LOOP	2
117	45242	13	MIX LOOP	4
118	45242	14	MIX LOOP	4
119	45242	18	BUS MOTOR	6
120	45242	19	RES CURB	3
121	45242	21	RES CURB	3
122	45242	22	RES LOOP	2
123	45242	24	MIX LOOP	4
124	45242	25	RES CURB	3
125	45242	28	RES CURB	3
126	45242	29	RES CURB	3
127	45242	30	MIX LOOP	4

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
128	45242	32	RES CURB	3
129	45242	33	RES LOOP	2
130	45242	34	RES CURB	3
131	45242	35	MIX LOOP	4
132	45242	36	RES CURB	3
133	45242	37	MIX LOOP	4
134	45242	38	MIX CURB	5
135	45242	41	MIX LOOP	4
136	45242	42	RES LOOP	2
137	45242	43	RES CURB	3
138	45242	48	RES LOOP	2
139	45242	49	RES CURB	3
140	45242	54	RES CURB	3
141	45242	57	RES CURB	3
142	45242	58	RES LOOP	2
143	45242	59	RES LOOP	2
144	45242	62	MIX CURB	5
145	45242	65	RES LOOP	2
146	45242	72	RES LOOP	2
147	45242	85	RES LOOP	2
148	45249	6	RES CURB	3
149	45249	8	MIX LOOP	4
150	45249	9	RES LOOP	2
151	45249	10	MIX CURB	5
152	45249	12	RES LOOP	2
153	45249	15	RES CURB	3
154	45249	16	RES CURB	3
155	45249	17	RES CURB	3
156	45249	20	RES CURB	3
157	45249	26	RES CURB	3
158	45249	31	RES LOOP	2
159	45249	40	RES CURB	3
160	45249	44	RES LOOP	2
161	45249	45	RES LOOP	2
162	45249	99	RES LOOP	2
163	47803	10	RES LOOP	2
164	47803	26	MIX LOOP	4
165	47804	80	RES LOOP	2
166	48035	49	RES CURB	3
167	48036	18	RES CURB	3
168	48036	55	RES LOOP	2
169	48036	56	RES CURB	3
170	48043	10	RES LOOP	2
171	48044	42	RES CURB	3
172	48045	6	RES CURB	3
173	48045	15	RES CURB	3

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
174	48184	4	RES LOOP	2
175	48184	5	RES LOOP	2
176	48184	8	RES LOOP	2
177	49201	34	RES LOOP	2
178	49202	11	MIX LOOP	4
179	49203	21	RES LOOP	2
180	53208	18	RES LOOP	2
181	53208	28	RES LOOP	2
182	53208	49	FOOT	1
183	53214	28	RES LOOP	2
184	53214	30	RES LOOP	2
185	53214	35	RES LOOP	2
186	53223	74	RES LOOP	2
187	53223	75	RES CURB	3
188	53223	85	RES LOOP	2
189	60606	10	FOOT	1
190	60606	26	FOOT	1
191	60606	28	FOOT	1
192	63301	5	MIX LOOP	4
193	63301	46	RES LOOP	2
194	63301	64	RES LOOP	2
195	63303	37	RES CURB	3
196	67209	8	RES LOOP	2
197	67212	5	RES CURB	3
198	67212	6	RES LOOP	2
199	68114	1	RES LOOP	2
200	68114	57	RES LOOP	2
201	68124	7	RES CURB	3
202	68124	11	RES CURB	3
203	72204	6	MIX LOOP	4
204	72204	15	RES LOOP	2
205	72204	24	RES LOOP	2
206	72204	26	MIX LOOP	4
207	75067	3	RES CURB	3
208	75067	39	RES CURB	3
209	75067	42	RES CURB	3
210	75080	28	MIX LOOP	4
211	75080	35	RES CURB	3
212	75080	45	RES LOOP	2
213	75093	2	RES CURB	3
214	75228	6	RES LOOP	2
215	75228	14	RES LOOP	2
216	75228	22	RES LOOP	2
217	75228	35	RES LOOP	2
218	76119	1	RES CURB	3
219	76119	13	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
220	76119	17	RES LOOP	2
221	76119	29	RES CURB	3
222	78227	17	RES CURB	3
223	78242	71	RES CURB	3
224	78242	73	RES CURB	3
225	78242	75	RES CURB	3
226	89014	11	RES LOOP	2
227	89014	75	RES LOOP	2
228	89015	7	RES LOOP	2
229	89015	8	RES LOOP	2
230	89015	86	RES LOOP	2
231	90247	8	RES LOOP	2
232	90247	12	RES LOOP	2
233	90247	19	RES LOOP	2
234	90247	25	RES LOOP	2
235	90247	26	RES LOOP	2
236	90247	31	RES LOOP	2
237	90247	32	RES LOOP	2
238	90248	11	BUS MOTOR	6
239	90248	14	RES LOOP	2
240	90248	17	RES LOOP	2
241	90249	10	RES LOOP	2
242	90249	21	RES LOOP	2
243	91761	56	RES CURB	3
244	91761	57	RES CURB	3
245	91764	10	RES LOOP	2
246	91764	19	RES LOOP	2
247	94122	1	FOOT	1
248	94122	2	RES LOOP	2
249	94122	3	RES LOOP	2
250	94122	5	RES LOOP	2
251	94122	6	FOOT	1
252	94122	7	FOOT	1
253	94122	10	FOOT	1
254	94122	11	FOOT	1
255	94122	12	RES LOOP	2
256	94122	13	FOOT	1
257	94122	14	RES LOOP	2
258	94122	15	RES LOOP	2
259	94122	16	FOOT	1
260	94122	19	FOOT	1
261	94122	21	FOOT	1
262	94122	24	FOOT	1
263	94122	25	FOOT	1
264	94122	27	FOOT	1
265	94611	1	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
266	94611	11	FOOT	1
267	94611	21	RES CURB	3
268	94611	31	RES CURB	3
269	96001	1	MIX LOOP	4
270	96001	2	RES LOOP	2
271	96001	3	FOOT	1
272	96001	4	MIX LOOP	4
273	96001	5	MIX LOOP	4
274	96001	6	RES LOOP	2
275	96001	7	MIX LOOP	4
276	96001	8	MIX LOOP	4
277	96001	10	RES LOOP	2
278	96001	11	RES CURB	3
279	96001	12	RES LOOP	2
280	96001	13	RES LOOP	2
281	96001	14	RES LOOP	2
282	96001	15	RES CURB	3
283	96001	16	RES LOOP	2
284	96001	17	RES CURB	3
285	96001	19	RES LOOP	2
286	96001	20	RES LOOP	2
287	96001	23	RES LOOP	2
288	96001	24	RES LOOP	2
289	96001	26	RES LOOP	2
290	96001	28	RES LOOP	2
291	96001	29	RES LOOP	2
292	96001	30	RES LOOP	2
293	96001	31	RES LOOP	2
294	96002	40	MIX LOOP	4
295	96002	41	RES LOOP	2
296	96002	42	RES LOOP	2
297	96002	43	MIX LOOP	4
298	96002	44	RES CURB	3
299	96002	45	RES LOOP	2
300	96002	46	RES CURB	3
301	96002	47	RES LOOP	2
302	96002	48	RES LOOP	2
303	96002	49	RES LOOP	2
304	96002	50	MIX LOOP	4
305	96002	51	RES LOOP	2
306	96002	52	RES LOOP	2
307	96002	53	RES LOOP	2
308	96002	54	RES LOOP	2
309	96002	55	RES LOOP	2
310	96002	56	RES LOOP	2
311	96002	57	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE	ROUTE TYPE CODE
			ALDRAN.FOS.STS.SAS.DATA	
312	96002	81	MIX LOOP	4
313	96003	70	RES LOOP	2
314	96003	71	RES LOOP	2
315	96003	72	RES LOOP	2
316	96003	73	RES LOOP	2
317	96003	74	RES LOOP	2
318	96003	75	RES LOOP	2
319	96003	76	RES LOOP	2
320	96003	77	RES LOOP	2
321	96003	78	RES LOOP	2
322	96003	79	RES LOOP	2
323	96003	80	RES LOOP	2
324	96003	82	RES LOOP	2
325	96003	83	RES LOOP	2
326	96003	84	RES LOOP	2
327	98011	32	RES CURB	3
328	98011	33	RES CURB	3
329	98011	42	RES CURB	3
330	98011	45	RES LOOP	2
331	98011	48	RES CURB	3
332	98310	24	RES LOOP	2
333	98310	61	RES LOOP	2
334	98312	33	RES CURB	3
335	98312	37	RES CURB	3
336	98312	52	RES CURB	3
337	98337	3	RES LOOP	2
338	98337	5	RES LOOP	2
339	98337	6	RES LOOP	2
340	98337	7	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-31. Please identify the other variables in
ALDRAN.FOS.STS.SAS.DATA set that were not included in LR-I-163.

RESPONSE:

The variables on ALDRAN.FOS.STS.SAS.DATA that are not in LR-I-163 are as follows:

1. ZIP3
2. ZIP2
3. ZIP5
4. State
5. City
6. Subcode (a code indicating whether the carrier was present)
7. Subpres (a notation indicating whether the carrier was present)
8. Rtype (route type name according to the ES data base)
9. Rrcode (route type code assigned to a given value for Rtype: 1 = mix curb,
2 = mix loop, 3 = residential curb, 4 = foot, 5 = residential loop, 6 = business
motorized)

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-37. Please explain why you did not re-estimate the CAT/FAT (Curbline Access/Foot Access Test) split factors to reflect the 1998 possible stops coverage levels. With respect to the CAT split factors, please confirm the following. If you do not confirm, please explain why:

(a) Residential and Curbline SDR, MDR, and B&M stops coverages, estimated from the City Carrier Cost System (CCS), are used with the estimating models.

(b) That you assume that all stops on the routes described in (a) are curbline stops.

(c) Drive Time, as measured from Mr. Raymond's Engineered Standards database, is not reflected in the CAT models.

RESPONSE:

The CAT/FAT split factors were not reestimated because changes in coverage levels between BY 1996 and BY 1998 were considered insignificant.

(a) I confirm that SDR, MDR, and BAM coverage ratios calculated for the combination of all residential and mixed curbline routes are substituted into the curb running time model to derive CAT split factors.

(b) Not confirmed. The BY 1996 coverages are calculated in Docket No. R97-1, USPS-H-143. This analysis derives a separate set of coverages by stop type (SDR, MDR, and BAM) for each of three route groups – curb, foot, and park & loop. For each combination of a route group and stop type, coverage is calculated as the total number of actual stops divided by the total number of possible stops. Total actual and possible stops by stop type are calculated as total actual and possible stops recorded over all CCS tests conducted on all CCS routes falling within the given route group.

The curb-route group consists of all residential curbline and mixed curbline routes. Therefore, total actual and possible SDR stops in the curb-route group are calculated as total stops recorded over all CCS tests conducted on residential curb and

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA**

mixed curb routes, including tests at stops accessed by foot as well as tests at stops accessed by vehicle. So the SDR coverage ratio for the curblines group is the coverage of all possible SDR stops on curblines routes, not just curb stops.

Similarly, MDR and BAM coverage ratios for the curb-route group do not equal the percentages of just the curblines stops that are accessed. Again, they equal the coverage percentages of all possible stops on curblines routes across all stop types.

(c) Confirmed. The CAT (i.e., curblines) regression is used to estimate route-access split factors that are applied solely to the cost of time carriers spend driving along the curblines sections of routes. These split factors are not applied to driving time costs.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-38. With respect to the FAT Foot split factors, please confirm the following. If you do not confirm, please explain why:

(a) Business, Residential, and Mixed SDR, MDR, and B&M stops coverages, as estimated from the City Carrier Cost System (CCS), are used with the estimating models.

(b) That you assume that all stops on the routes described in (a) are FAT foot stops.

RESPONSE:

(a) I confirm that SDR, MDR, and BAM coverage ratios calculated for the combination all residential, business, and mixed foot routes are substituted into the foot-route running time model to derive foot-route split factors.

(b) Not confirmed. See my response to 37(b). The SDR, MDR, and BAM coverage ratios applied to the foot-route running time equation do not equal the percentages of just the total possible foot stops located on foot routes. These ratios equal the coverage percentages of all possible stops on these routes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-39. With respect to the Park & Loop FAT split factors, please confirm the following. If you do not confirm, please explain why:

(a) Business Motorized, Residential Park & Loop, and Mixed Park & Loop SDR, MDR, and B&M stops coverages, estimated from the CCS, are used with the estimating models.

(b) That you assume that all stops on the routes described in (a) are FAT Park & Loop stops.

(c) Drive Time, as measured from Mr. Raymond's Engineered Standards database, is not reflected in the Park & Loop FAT models.

RESPONSE:

(a) I confirm that SDR, MDR, and BAM coverage ratios calculated for the combination of all business motorized, residential park & loop, and mixed park & loop routes are substituted into the park & loop running time equation to derive park & loop split factors.

(b) Not confirmed. See my responses to 37(b) and 38(b). The SDR, MDR, and BAM coverage ratios applied to the park & loop running time equation do not equal the percentages of just the possible park & loop stops located on all business motorized and park & loop routes. The coverage ratios instead equal the coverage percentages of all possible stops on these routes.

(c) Confirmed. The park & loop running-time regression is used to estimate route-access split factors that are applied solely to the cost of time carriers spend walking along the park & loop sections of park & loop, curblines, and business motorized routes. These split factors are not applied to driving time costs.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-40. With respect to the Drive Time category, as measured from Mr. Raymond's Engineered Standards:

- (a) Please confirm that it represents both Drive Time associated with Park & LOOP stops as well as the Drive Time associated with Dismount Stops. If this is incorrect, please explain.**
- (b) Does it also represent the Drive Time associated with motorized Central, NDCBU, and VIM stops? Please explain.**
- (c) Please confirm that the Drive Time described in (a) and (b) above is not reflected in any of the CAT/FAT models.**
- (d) Please confirm that the Drive Time described in (a) and (b) above, and as measured from Mr. Raymond's Engineered Standards database, is attributed by the USPS on the basis of the R97-1 analyses of Drive/Stop, Stop/Activity, Deviation Delivery/Piece, and Routine Loops and Dismounts/Volume Variabilities.**

RESPONSE:

(a)-(b) Confirmed in the sense that the driving time activity category accounts for all carrier time spent driving along all sections of the route other than curblines sections.

(However, driving time excludes time spent driving from delivery units to the beginning of routes or from routes back to delivery units). Moreover, the CAT/FAT models are not applied to driving time costs. They are applied solely to the costs of driving along curblines sections of routes and walking along non-curblines sections of routes.

(c). Confirmed. The CAT/FAT models apply only to time that carriers spend walking on routes or driving along the curblines sections of routes.

(d). Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY**

MPA/USPS-T10-21. Please provide your opinion, rationale, and all available documentation on the following questions:

- (a) Has the average access time to a curblinestop changed from FY88 to FY98? If so, in what way?**
- (b) Has the average access time to a park & loop stop changed from FY88 to FY98? If so, in what way?**
- (c) Has the average access time to a dismount stop changed from FY88 to FY98? In so, in what way?**
- (d) Has the average access time to a foot stop changed from FY88 to FY98? If so, in what way?**

RESPONSE:

(a)-(d). The FY88 data required to answer this interrogatory are not available.

Therefore, FY89 data will substituted for FY88 data.

The following tables report average access times per actual stop for all foot, park & loop, and dismount stops combined and for all curblinestops in FYs 89 and 98.

These access times per stop are calculated as follows.

- 1. Total foot/park & loop access costs and total curblinestop access costs are obtained from the BY89 and BY98 segment 7 worksheets. The foot/park & loop access costs are regarded as costs applicable to the sum of all stops accessed by foot, including dismount stops as well as stops on the foot and park & loop sections of routes.**
- 2. Total actual stops reported in these worksheets are split into actual stops for all dismount, park & loop, and foot stops on the one hand, and all curblinestops on the other. The dismount, park & loop, and foot stops total is estimated as total actual stops reported in the worksheets times the ratio of route/access FAT running time cost to total running time cost over all stops. Similarly, the curblinestops total is**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY**

estimated as the total actual stops times the ratio of route/access CAT running time cost to total running time cost.

3. Access time cost per actual foot, park & loop, and dismount stop is estimated as total FAT access time cost divided by the estimated number of foot, park & loop, and dismount actual stops. Access time cost per actual curblines stop is estimated as total CAT access time cost divided by the estimated number of curblines actual stops.
4. These access time costs per stop are converted into access times per stop through the application of city carrier consolidated wage rates equal to \$19.40 for FY89 and \$25.94 for FY98.

**ESTIMATED ACCESS TIME PER ACTUAL STOP FOR FOOT,
PARK & LOOP, AND DISMOUNT STOPS
(Total Costs and Actual Stops are in 1,000)**

BASE YEAR	FOOT/ PARK & LOOP ACCESS COST	ESTIMATED FOOT, PARK & LOOP, AND DISMOUNT ACTUAL STOPS	ESTIMATED FOOT/ PARK & LOOP ACCESS COST PER ACTUAL STOP	ESTIMATED FOOT/ PARK & LOOP SECONDS PER ACTUAL STOP
1989	\$1,099,118	11,052,002	\$ 0.0994	18.45
1998	\$1,066,415	11,218,303	\$ 0.0951	13.19

**ESTIMATED ACCESS TIME PER ACTUAL STOP
FOR CURBLINE STOPS
(Total Costs and Actual Stops are in 1,000)**

BASE YEAR	CURB ACCESS COST	ESTIMATED CURB ACTUAL STOPS	ESTIMATED CURB ACCESS COST PER ACTUAL STOP	ESTIMATED CURBLINE SECONDS PER ACTUAL STOP
1989	\$201,595	3,102,101	\$ 0.0650	12.06
1998	\$142,257	4,023,861	\$ 0.0354	4.91

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY**

Observe that it is not possible to further disaggregate the cost and actual stops estimates derived for the aggregate of foot, park & loop, and dismount stops into separate cost and stops estimates for foot only, park & loop only, and dismount only. The reason is that the segment 7 worksheets report only one aggregate running time cost and one aggregate access time cost for all foot and park & loop route sections combined. There are no data available that would allow one to estimate the percentages of stops on foot and park & loop route sections that are just on the foot sections, just on the park & loop sections, or accessed solely as dismount stops.

The reason access times per actual stop fell between FY89 and FY98 is the reduction in the street-time percentages for route/access FAT and route/access CAT running time costs that occurred over this period. This reduction resulted from substitution into the BY98 worksheets of the new street-time percentages presented in Docket No. R2000-1, USPS-T-13 for the old street-time percentages (first presented in Docket No. R87-1, USPS-T-7) that were applied in the BY89 worksheets.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY**

MPA/USPS-T10-22. Has total (system-wide) city carrier run time (Le., route plus access time) changed between FY88 and FY98 for each of the following sets of delivery types? If so, in what way? Please provide your opinion, rationale, and all available documentation:

- (a) Curblin deliveries**
- (b) Park and loop deliveries**
- (c) Dismount deliveries**
- (d) Foot deliveries**
- (e) Central Deliveries**

RESPONSE

The deliveries data required to answer this interrogatory could not be located.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY**

MPA/USPS-T10-23. For each of the following route types, has average time to travel between the delivery unit and the route changed between FY88 and FY98? If so, in what way? Please provide your opinion, rationale, and all available documentation.

- (a) Curblin routes
- (b) Park and loop routes
- (c) Dismount routes
- (d) Central routes
- (e) Foot Routes

RESPONSE:

(a)-(e). The available data allow for the calculation of average travel times between delivery units and routes for all park & loop routes, all foot routes, and all curblin routes. Again, no data could be located for FY88. Therefore, FY89 data are substituted for FY88 data.

The following table presents average travel times per possible stop for FY89 and FY98.

**ESTIMATED TRAVEL TIME PER POSSIBLE STOP BY ROUTE GROUP,
FY89 TO FY98**

FY	ROUTE GROUP	TRAVEL TIME COST (\$1,000)	ESTIMATED TRAVEL TIME HOURS (1,000)	ESTIMATED TRAVEL TIME COST PER POSSIBLE STOP	ESTIMATED TRAVEL TIME SECONDS PER POSSIBLE STOP
1989	FOOT	\$ 66,430	3,424	\$ 0.0521	9.67
1989	PARK & LOOP	\$ 152,973	7,885	\$ 0.0166	3.09
1989	CURB	\$ 36,466	1,880	\$ 0.0062	1.14
1998	FOOT	\$ 44,066	1,699	\$ 0.0346	4.80
1998	PARK & LOOP	\$ 260,784	10,053	\$ 0.0284	3.94
1998	CURB	\$ 79,477	3,064	\$ 0.0134	1.86

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY**

Foot-route travel times decreased from FY89 to FY98 because the new foot-route travel-time percentages used in the BY98 segment 7 worksheets are lower than corresponding percentages used in the BY89 segment 7 worksheets. Park & loop and curb-route travel times increased from FY89 to FY98 because of large increases in total carrier time spent on these routes, and because the new park & loop and curb-route travel-time percentages used in the BY98 worksheets are generally equal to or only slightly lower than corresponding percentages used in the BY89 worksheets. These changes in travel-time percentages resulted from the substitution of the revised street-time percentages presented in R2000-1, USPS-T-13 into the BY98 worksheets in place of the street-time percentages, first presented in R87-1, USPS-T-7, that were used in the BY89 worksheets.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-T12-1: Please refer to your testimony at page 33, footnote 43 and your response to MPAIUSPS-T12-18, referring to the A.T. Kearney Data Quality Study (April 16, 1999).

- a. Please explain specifically how the Engineered Resign data you received from Witness Raymond serve to update the "relatively old and highly imprecise carrier special studies" cited by the Data Quality Study.
- b. Please describe your understanding of whether collection of the ES data was *appropriately designed and compiled*, and whether the study serves as an acceptable substitution for the street time and street activity analyses previously relied upon for ratemaking purposes.
- c. Please identify your knowledge of any similarities between the ES study and the *route measurement systems or engineering time studies of other postal administrations or courier companies used to design and attribute their delivery costs*, as suggested by the Data Quality Study.
- d. Please provide your assessment of the appropriateness of the use of the ES data in the current R2000-1 docket, given the Data Quality Study's suggestions that such a project is a "potential alternative source of data" and "will take several years to fully develop," including any and all quality and validation steps you or others performed to merit its use.

RESPONSE:

- (a) Please see my testimony (Docket No. R2000-1, USPS-T-12) at 32-33, 36-37.
- (b) It is my understanding that the sample of routes selected for the collection of data used to estimate new street-time percentages was designed to be representative of the national system of city carrier letter routes.
- (c) I have no knowledge of any such similarities or differences.
- (d) In my view, the statement that the Delivery Redesign project will "take several years to fully develop" means that it will take several years to fully analyze the large amounts of data collected in that project. However, the tally data set already extracted from the ES database is, in my view, superior to the 1986 data set as a source for measuring the street-time percentages by activity category.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA**

The basis for this view is explained at pages 32-33, 36-37 of my Docket No.

R2000-1 testimony (USPS-T-12).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-T12-6. Please confirm that for ZIP 98011, Route 32, the city carrier data set that you provided in response to MPA/USPS-T12-26 (LR-I-219) lists 334 Curb, 195 Centralized, 26 NDCBU, and 73 Other possible deliveries.

(a) Please refer to your response to MPA/USPS-T12-30 and confirm that the route type reported on the ES database was Residential Curb, and explain the basis for this.

(b) Please refer to your response to MPA/USPS-T12-26 and confirm that the route type you utilized was Residential Loop, and explain the basis for this.

RESPONSE:

(a) Confirmed. It is my understanding that the basis for the residential curb route-type selection was the large number of residential curblines possible delivery points on this route.

(b) Confirmed. This route type was selected based on application of the algorithm that assigns to the residential park & loop category all routes on which 70% or more of the possible deliveries are residential deliveries, and to which a delivery mode of "park & loop" (P) has been assigned by the Carrier Route Master File (CRMF). See Docket No. R2000-1, USPS LR-I-159 at page 9, SAS lines 108-114.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA**

NAA/USPS-T12-7. Please confirm that for ZIP 30087, Route 59, the city carrier data set that you provided in response to MPA/USPS-T12-26 (LR-I-219) lists 357 NDCBU, 266 Centralized, 138 Curb, and 4 Other possible deliveries for this same route.

- a. Please refer to your response to MPA/USPS-T12-30 and confirm that the route type reported on the ES database was Residential Loop, and explain the basis for this.
- b. Please refer to your response to MPA/USPS-T12-26 and confirm that the route type you utilized was Residential Loop, and explain the basis for this.

RESPONSE:

(a) Confirmed. It is my understanding that the basis of this allocation of the route to the residential loop category was the large number of residential NDCBU and residential centralized possible deliveries located on the park & loop sections of the route.

(b) Confirmed. This route type was selected based on application of the algorithm that assigns to the residential park & loop category all routes on which 70% or more of the possible deliveries are residential deliveries, and to which a delivery mode of "park & loop" (P) has been assigned by the Carrier Route Master File (CRMF). See Docket No. R2000-1, USPS LR-I-159 at page 9, SAS lines 108-114.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA,
REDIRECTED FROM WITNESS KINGSLEY

NAA/USPS-T10-21. Please consider two sets of twenty-four delivery points, each served by park and loop routes. Set (A) is served by a single cluster box; the other (Set B) consists of twenty-four distinct single family dwellings.

- a. Do you agree that access time for serving those delivery points is likely to be less on Set A than Set B?
- b. Is there any reason why coverage related load time would differ between Set A and Set B?
- c. Is there any reason why elemental load time would differ between Set A and Set B, assuming the same number and mix of mail is delivered on both routes?

RESPONSE:

- (a) A single cluster box containing twenty-four delivery points would probably require one or, at most, two carrier stops, where a stop is defined as a point where the carrier physically stops to delivery mail to one or more receptacles or to an individual. Twenty-four distinct single family dwellings would constitute twenty-four separate stops. Therefore, access time for serving Set B should be at least 12 times higher than access time for serving set A.
- (b) Coverage-related load time – also known as fixed-time at a stop - is load time associated strictly with the activity of going to a stop; it is independent of the quantify and mix of mail loaded at that stop. For this reason, coverage-related load time always increases as actual stops increase. Therefore, coverage-related load time would be higher for set B than for set A.
- (c) Because elemental load time elasticities are less than 100% across all stop types (SDR, MDR, and BAM), load time per piece per stop declines as total pieces loaded per stop increase. Therefore, total elemental load time should be less in set A than in set B, because, given equal numbers and mixes of pieces across the two sets,

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA,
REDIRECTED FROM WITNESS KINGSLEY

pieces per stop are much higher in set A than in set B. Moreover, since load times per piece are lower in set A than in set B, whereas total pieces are the same, total load time is also lower in set A.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA,
REDIRECTED FROM WITNESS KINGSLEY**

22(d). Would time devoted by a city carrier to handling a mis-sequenced piece at the delivery point be categorized as elemental load time, coverage-related load time, or some other category?

RESPONSE: This time would be categorized as elemental load time.

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-1. Please refer to page 7, lines 7 through 12 of your testimony, wherein you define the measurement of the stops effect, which you indicate is the minimum of the load times recorded during the 1985 load-time field test at stops receiving only one letter piece.

- (a) Please explain what possible actions or inaction in which a carrier might be engaged during the time period between accessing the mailbox and loading the mailbox.
- (b) How would a trained data collector be able to verify that the letter carrier was engaged in whatever action or inaction occurs during the stops effect as delineated in (a)?
- (c) Please confirm that the amount of time called the "stops effect" and fixed with respect to volumes is measured in terms of the amount of time spent to load a single piece of letter mail. If you do not confirm, please explain.
- (d) In determining the duration of the stops effect, did you find that the value of the stops effect was different between BAM, SDR, and MDR routes? Please explain.

RESPONSE:

- (a) As I stated in response to Docket No. R97-1 NAA/USPS-T17-8(b), this work is the activity of preparing to handle mail pieces, mail bundles, or mail-related equipment. This work occurs immediately after the carrier reaches the stop, and just prior to the initiation of the piece, bundle, or equipment handling.
- (b) One way to do this would be to conduct a test to record the activity a carrier undertakes immediately after having accessed a stop. The trained data collector would measure the time taken by the carrier to prepare for the handling of mail pieces, mail bundles, or mail-related equipment and the placement of mail into or collection of mail from receptacles. The data collector would estimate this time as the interval occurring immediately after the stop access has been completed through the point in time just prior to when handling of mail pieces, bundles, or mail-

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

related equipment has started. This measure would constitute a direct estimate of fixed-time at a stop.

- (c) Partially confirmed. I measure fixed-time at a stop for a given stop type as the average of the lowest 20th percentile of 1985 carrier times recorded at one-letter stops. I use this lowest 20th percentile solely to infer a value for fixed-time at a stop, given the absence of any direct measurements of this fixed time. See also my responses to Docket No. R97-1, UPS/USPS-T17-11 (a) and (b).
- (d) Confirmed. The averages of the lowest 20th percentile of carrier times differ across the three stop types.

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-2. Please refer to USPS-LR-I-159, page 20. Please provide (or indicate where provided) a definition for each column heading.

RESPONSE:

ILTT = The sum over all sampled routes of the given route type of each route's average daily load time tally count multiplied by the route's inflation factor. Each route's inflation factor equals the ratio of the gross total number of routes for the given route type in the route's ZIP Code divided by the corresponding total sampled routes in the ZIP Code.

ISST = The sum over all sampled routes of the given route type of each route's average daily street support tally count multiplied by the route's inflation factor.

IDTT = The sum over all sampled routes of the given route type of each route's average daily driving time tally count multiplied by the route's inflation factor.

IRAFI = The sum over all sampled routes of the given route type, of each route's average daily route/access foot-park & loop tally count multiplied by the route's inflation factor.

IRACT = The sum over all sampled routes of the given route type of each route's average daily route/access curblines tally count multiplied by the route's inflation factor.

ICBT = The sum over all sampled routes of the given route type of each route's average daily collection box tally count multiplied by the route's inflation factor.

ITT = The sum over all sampled routes of the given route type of each route's average daily total street activity tally count multiplied by the route's inflation factor.

ITRV = The sum over all sampled routes of the given route type of each route's average daily travel time tally count multiplied by the route's inflation factor.

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

LTPERC = ILTT/ITT = The percentage of inflated street activity tallies for the given route type that are load time tallies.

SSPERC = SST/ITT = The percentage of inflated street activity tallies for the given route type that are street support tallies.

DTPERC = IDTT/ITT = The percentage of inflated street activity tallies for the given route type that are driving time tallies.

RAFPERC = IRAFT/ITT = The percentage of inflated street activity tallies for the given route type that are route/access foot – park & loop tallies.

RACPERC = IRACT/ITT = The percentage of inflated street activity tallies for the given route type that are route/access curblines tallies.

CBPERC = ICBT/ITT = The percentage of inflated street activity tallies for the given route type that are collection box tallies.

TRVPERC = ITRVT/ITT = The percentage of inflated street activity tallies for the given route type that are travel time tallies.

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-3. Both the access time and load time can be clearly delineated as carrier activities. For example, a carrier would be able to identify the activity in which he or she was engaged during access or load.

- (a)** How would a carrier delineate the activity in which she or he was engaged during the stops effect?
- (b)** Why would the stops effect not more logically be a part of the load time?

RESPONSE

- (a)** A carrier would delineate the activity of preparing to handle mail pieces, bundles, or mail-related equipment. The carrier would do so by describing what he or she does immediately after reaching a stop, but prior to handling mail pieces, bundles, or equipment.
- (b)** Load time at a stop is time that varies in response to changes in mail volume and volume mix at that stop. The stops effect is time that is independent of the amount and mix of mail delivered or collected at the stop. It depends solely on coverage.

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-4. Please refer to lines 15 through 17 on page 32 of your testimony, wherein you discuss witness Raymond's data collection efforts. You indicate that witness Raymond collected data for loading, driving, route-access (FAT), route-access (CAT), collection, and street support functions.

- (a) Did witness Raymond collect data for the stops effect? Why or why not; please explain.**
- (b) Was the stops effect observable to the data collectors? Were barcodes or activity codes or descriptions given to the data collectors for the stops effect? Please explain.**

RESPONSE:

- (a) I am unaware of any stops effect data collected by Mr. Raymond. I was not involved in decisions made by the Engineered Standards / Delivery Redesign project team relating to the data to be collected in its surveys.**
- (b) Please see my response to part (a).**

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-5. Please refer to line 19, page 32, through line 4, page 33, wherein you indicate that the Engineering Standards data set accounts for recent operational practices much more accurately than does the 1986 data set.

- (a) Please define the measure of accuracy, and whether it is a statistical measure.
- (b) Please explain the major changes between the two data sets in their reflection of current operational practices.
- (c) Please identify all changes in operational practices to which you refer.
- (d) Was the 1986 data set created for the purpose of a rate case or rate analysis? Please list all purposes for creation of the 1986 data set.

RESPONSE:

- (a/b) I have not produced quantitative measures of accuracy. The reasons I believe the Engineered Standards data set accounts for recent operational practices more accurately than does the 1986 data set are presented in my direct testimony on page 33 at lines 1 through 18, and page 37 at lines 9 through 23.
- (c) Please see my testimony at page 33, lines 11 through 18, and pages 36-37.
- (d) A discussion of the objectives of the 1986 data set is beyond the scope of my testimony. Please see Docket No. R87-1, USPS-T-7 and Exhibit B to USPS-T-7 for a presentation of these objectives.

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-6. Please refer to lines 2 through 10 on page 34 of your testimony.

- (a) What was the date of coverage for the Carrier Route Master File that you used?**
- (b) You indicate that four of the ES routes could not be located on the CRMF; please explain this discrepancy.**
- (c) Does this discrepancy call into doubt the accuracy of the files?**

RESPONSE:

- (a) The date of coverage is Postal Fiscal Year 1997 – Quarter 4.**
- (b) The SAS program ES.CNTL (documented in USPS LR-I-159) assigns 5-digit zip codes to the routes located on the Engineered Standards data base through a merger of the ALDRAN.THREEZIP.CSV and ALDRAN.FOS.STS.SAS.DATA files by city. The 5-digit zip code assigned to each route equals the 3-digit zip code from ALLDRAN.THREEZIP.CSV plus the first two digits of the route number obtained from ALLDRAN.FOS.STS.SAS.DATA. However, the 5-digit zip codes assigned in this manner to the four routes in question do not contain the route numbers for such routes according to the CRMF. Therefore, no information was available from the CRMF to determine which route-type categories the four routes should be assigned to.**
- (c) To determine whether the absence of these four routes from the analysis materially affects the estimates of street-time percentages, I conducted a simple test. Rather than attempt to locate these four routes on the CRMF, and to then determine their route type categories based on CRMF information, I assumed that their correct route type categories are the ones reported on the ES data base. This determination of route type categories enabled me to include all tally data obtained for the four routes in a new calculation of street-time percentages.**

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

These new percentages, which are now based on tallies from 340 routes (the initial 336 plus the four new routes), are shown in the table below. The table also shows the official street-time percentages calculated based on tallies from the initial 336 routes. Note, also, that three of the four new routes are categorized as residential park & loop, and one is categorized as mixed park & loop.

BY 1998 STREET-TIME PERCENTAGES BASED ON DATA FROM 340 ROUTES IN THE ES DATA BASE						
ROUTE TYPE	Load Time %	Street Support %	Driving Time %	Route Access Foot %	Route Access Curb %	Collection Box %
FOOT	49.35%	15.23%	2.16%	32.51%	0.44%	0.31%
RES LOOP	35.36%	17.76%	11.25%	33.09%	2.25%	0.29%
RES CURB	47.64%	18.53%	8.85%	9.29%	15.59%	0.08%
MIX LOOP	34.60%	13.04%	18.48%	30.18%	3.49%	0.21%
MIX CURB	35.61%	17.82%	20.09%	20.35%	5.43%	0.71%
BUS. MOTORIZED	30.59%	16.76%	27.94%	20.00%	4.71%	0.00%

OFFICIAL BY 1998 STREET-TIME PERCENTAGES BASED ON DATA FROM 336 ROUTES IN THE ES DATA BASE						
ROUTE TYPE	Load Time %	Street Support %	Driving Time %	Route Access Foot %	Route Access Curb %	Collection Box %
FOOT	49.35%	15.23%	2.16%	32.51%	0.44%	0.31%
RES LOOP	35.27%	17.79%	11.23%	33.20%	2.22%	0.29%
RES CURB	47.64%	18.54%	8.85%	9.30%	15.59%	0.08%
MIX LOOP	33.22%	12.81%	18.59%	32.88%	2.27%	0.23%
MIX CURB	35.61%	17.82%	20.09%	20.34%	5.43%	0.71%
BUS. MOTORIZED	30.59%	16.77%	27.94%	20.00%	4.70%	0.00%

A comparison of the top and bottom parts of this table show that the addition of the four routes to the calculations changes the street-time percentages by extremely small amounts within the residential loop category, and by moderate amounts within the mixed loop route category. For residential loop, the biggest

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

changes are a 0.09 percentage point increase in the load-time percentage and 0.11 percentage point decrease in the route/access FAT percentage. For mixed loop, the load-time percentage increases by 1.38 percentage points, and the route/access FAT percentage decreases by 2.70 percentage points.

- (d) The changes just summarized in part (c) do not, in my view, seriously impair the accuracy of the cost analysis. As the table below shows, the main effect of applying the street-time percentages based on tallies from the 340-route data set is to increase volume-variable load-time costs by a few million dollars above the costs produced by the official percentages, which are based on tallies from the initial 336 routes.

BY 1998 VOLUME-VARIABLE LOAD-TIME COSTS (\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	Official Costs Based on Tallies from the Initial 336 ES Routes	Costs Based on Tallies from all 340 ES Routes
FIRST-CLASS MAIL:		
SINGLE-PIECE LETTERS	314,079	315,462
PRESORT LETTERS	307,014	308,418
TOTAL LETTERS	621,093	623,880
SINGLE-PIECE CARDS	22,510	22,610
PRESORT CARDS	16,732	16,809
TOTAL CARDS	39,242	39,419
TOTAL FIRST-CLASS	660,335	663,299
PRIORITY MAIL	49,856	50,079
EXPRESS MAIL	22,406	22,497
MAILGRAMS	103	104
PERIODICALS:		
IN-COUNTY	8,891	8,932
OUTSIDE COUNTY:		
REGULAR	69,247	69,564
NON-PROFIT	20,566	20,660
CLASSROOM	585	588
TOTAL PERIODICALS	99,289	99,744

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

BY 1998 VOLUME-VARIABLE LOAD-TIME COSTS (\$1,000)

CLASS, SUBCLASS, OR SPECIAL SERVICE	Official Costs Based on Tallies from the Initial 336 ES Routes	Costs Based on Tallies from all 340 ES Routes
(Continued)	(Continued)	(Continued)
STANDARD A:		
SINGLE PIECE RATE	1,496	1,501
COMMERCIAL STANDARD:		
ENHANCED CARR RTE	352,282	353,893
REGULAR	297,595	298,955
TOTAL COMMERCIAL	649,877	652,848
AGGREGATE NONPROFIT:		
NONPROF ENH CARR RTE	16,495	16,570
NONPROFIT	72,771	73,104
TOTAL AGGREG NONPROFIT	89,266	89,674
TOTAL STANDARD A	740,639	744,023
STANDARD MAIL (B):		
PARCELS ZONE RATE	25,240	25,353
BOUND PRINTED MATTER	22,082	22,180
SPECIAL STANDARD	10,313	10,360
LIBRARY MAIL	1,492	1,499
TOTAL STANDARD (B)	59,127	59,392
US POSTAL SERVICE	1,819	1,626
FREE MAIL	1,835	1,843
INTERNATIONAL MAIL	6,134	6,160
TOTAL MAIL	1,641,343	1,648,767
SPECIAL SERVICES:		
REGISTRY	5,163	5,185
CERTIFIED	93,882	94,311
INSURANCE	4,516	4,536
COD	1,960	1,969
SPECIAL DELIVERY	-	-
MONEY ORDERS	-	-
STAMPED ENVELOPES	-	-
SPECIAL HANDLING	-	-
POST OFFICE BOX	-	-
OTHER	522	522
TOTAL SPECIAL SERVICES	106,043	106,523
TOTAL VOLUME	1,747,386	1,755,290
FIXED	880,255	884,057
GRAND TOTAL	2,627,641	2,639,347

RESPONSE OF WITNESS BARON TO OCA INTERROGATORIES

OCA/USPS-T12-7. Please refer to lines 2 through 8 on page 36 of your testimony. You indicate that the new street-time proportions are substantially different from those previously presented. Have you examined these differences to whether they are statistically significant? If so, what were the results? If not, why not?

RESPONSE:

I have not examined the differences to determine statistical significance. However, the important point to consider here is that the Postal Service has chosen to substitute the new street-time proportions for the 1986 proportions in its allocation of actual accrued street-time costs across activities. The accrued cost allocations based on the new proportions are substantially different than those based on the 1986 proportions. Thus, the implication of any finding that the differences between the proportions are not statistically significant is unclear. Whether they are or not, the competing cost allocations they produce would be the same as they are currently, as would the large differences between these two allocations.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-8. Please refer to pages 39-41 of your testimony in Docket No. R97-1 (USPS-T-17). Please provide versions of Tables 14-16 that contain figures for base year 1998.

RESPONSE:

The following three tables are versions of tables 14-16 from my R97-1 testimony updated with base year 1998 data.

Cost Element	Previous	New	Difference
Total Accrued Costs	\$1,571,780	\$1,571,780	
Fixed-Time Costs (to Access)		\$220,025	
Volume-Variable Fixed-Time Costs		\$18,324*	
Load-Time Costs	\$1,571,780	\$1,351,756	
Volume Effect Costs	\$959,047*	\$839,305*	
Coverage-Related Costs	\$612,733		
Volume-Variable Coverage-Related Costs	\$127,370*		
Total Volume-Variable Costs	\$1,086,417	\$857,629	-\$228,788

* included in total

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE**

Table 2. Comparison of BY 1998 Volume-Variable Costs, MDR Stops Previous vs. New Methodology (\$000)			
Cost Element	Previous	New	Difference
Total Accrued Costs	\$948,109	\$948,109	
Fixed-Time Costs (to Access)		\$20,868	
Volume-Variable Fixed-Time Costs		\$1*	
Load-Time Costs	\$948,109	\$927,241	
Volume Effect Costs	\$617,494*	\$667,614*	
Delivery Effect Costs		\$66,644*	
Coverage-Related Costs	\$330,615		
Volume-Variable Coverage-Related Costs	\$30,040*		
Total Volume-Variable Costs	\$647,534	\$734,259	\$86,725

* included in total

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE**

Table 3. Comparison of BY 1998 Volume-Variable Costs, BAM Stops Previous vs. New Methodology (\$000)			
Cost Element	Previous	New	Difference
Total Accrued Costs	\$336,286	\$336,286	
Fixed-Time Costs (to Access)		\$19,351	
Volume-Variable, Fixed- Time Costs		\$608*	
Load-Time Costs	\$336,286	\$316,935	
Volume Effect Costs	\$175,228*	\$158,943*	
Delivery Effect Costs		\$3,918*	
Coverage-Related Costs	\$161,057		
Volume-Variable Coverage-Related Costs	\$35,389*		
Total Volume-Variable Costs	\$210,617	\$163,469	- \$47,148

*included in total

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-9. Please refer to your response to interrogatory NAA/USPS-T17-10 in R97-1 (Tr. 1015188). You were asked to provide lower bounds for the "stops effect" for the three stop types. You stated,

[T]he upper bound estimates equal only about 1 second. So any discrepancy between these estimates and the unobserved true values must be less than 1 second. Thus, the discrepancy falls within the range of ordinary measurement and rounding error.

- (a) Is it correct that your upper bound estimates are average values for the lowest quintile of one-piece stops for each stop type? If not, please provide a more complete description of the upper bound estimates.
- (b) Please confirm that fixed load time estimates of 0 would fall within the range of ordinary measurement and rounding error. If you do not confirm, please explain. Given that the ability to calculate an average implies the ability to calculate a variance, please provide the variance and standard deviation for the fixed load time estimates.

RESPONSE:

- (a) Confirmed. Specifically, these estimates are average values for the lowest quintile of single letter-piece stops for each stop.
- (b) Confirmed. Given that the 1985 measurements indicate that even loading one letter takes as little as one second, it is conceivable that fixed time at a stop - the time spent prior to any handling of mail or mail-related equipment - is less than one second, and therefore so low as to be virtually unmeasurable. In this case, a data collector could validly conclude that fixed time at a stop is virtually zero, or, alternatively, that zero is the best possible point estimate of this fixed time.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T12-10. Please refer to LR-I-80, file CS06&7.xls, tab 7.0.4.2, cells D15:F15.

- (a) Please confirm that the entries in these cells are the fixed times at stops for SDR, MDR, and BAM stop types, respectively. If you do not confirm, please explain what the values in these cells represent and identify where the values for fixed times at stops may be found.**
- (b) Please confirm that setting these cells to zero eliminates the fixed time at stops effect. If you do not confirm, please explain how to remove the fixed time at stops effect from the base year cost matrix.**
- (c) Please confirm that eliminating the fixed time at stops effect increases volume variable load time costs in segment 7 by \$163 million. If you do not confirm, please provide the correct amount and show its derivation.**

RESPONSE

- (a) Confirmed.**
- (b) Confirmed.**
- (c) Confirmed.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T12-11. Please refer to witness Daniel's responses to interrogatories AAPS/USPS-T28-3-5. Witness Daniel refers to development of a distribution key that distributes elemental load time on the basis of weight.

- (a) Please confirm that the distribution key used to distribute elemental load time costs in the base year is pieces, not weight. If you do not confirm, please provide a citation to CSO6&7.xls by tab, by cell, showing the distribution of elemental load time costs by weight.**
- (b) Please explain how, if at all, weight is used to distribute elemental load time costs in the roll-forward.**
- (c) Witness Daniel seems to be testifying that weight affects elemental load time costs. Please explain why weight is not used, at least in part, to distribute elemental load time costs in the base year.**

RESPONSE:

(a) Confirmed.

(b) It is my understanding that weight is not used to distribute test year volume-variable load-time costs across mail subclasses.

(c) It is my understanding that weight has not been used to distribute elemental load time costs because of the view that shape alone is the primary mail characteristic that determines why one piece takes longer to load than another piece. For example, a parcel is viewed as taking longer to load than a flat or a letter primarily because its typical shape dimension makes it more difficult to handle during the loading process.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-¹²~~11~~. Please refer to your testimony at page 32, lines 14-17, where you note that witness Raymond (USPS-T-13) assigned a variable defining the "street time activity category of each tally." Regarding the assignment of these variables:

- (a) Did you review the ES tallies to identify whether or not they could be accurately assigned to relevant street-time categories? If yes, please discuss in detail the extent and results of your review.
- (b) Of the various levels and codes used in the Outside/Street work-sampling hierarchy, did you identify any that could not be assigned readily to a particular street-time activity category? If yes, please identify them and discuss the resolution, if any, concerning appropriate assignment.
- (c) Did you discuss or establish with witness Raymond any protocols for assigning ES tallies to street-time activity categories? If yes, please describe fully these discussions or protocols.
- (d) In your opinion, is the nature of the ES tallies and their relation or assignment to street-time activity categories open to interpretation? If yes, please explain your answer in detail. If no, why not?

RESPONSE:

- (a) Yes. I determined that the data collected for Levels 10, 11.1, 11.2, 11.3, 11.4, and 11.4.1 of the work-sampling data set provided the information that is required to assign tallies to the appropriate street-time activity categories. See Docket No. R2000-1, USPS-T-13 at 10-12 and Appendix D.
- (b) I did in the sense that I observed several records in the ES database that showed what I initially considered to be questionable allocations of tallies to the load-time activity. However, I questioned Mr. Raymond to verify that the carriers being observed in these instances were correctly identified as located at a delivery stopping point in the process of either putting mail into receptacles, or preparing to do so. I received assurances from Mr. Raymond that this was indeed the case in all such instances.
- (c) Yes. See my response to ADVO/USPS-T12-3 (a)-(c).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

(d) I see little reason for controversy concerning the allocation of street-time tallies to street-time activity categories. The definitions of the street-time activities are straightforward. Load time is time at a delivery stop devoted to loading or preparing to load mail, and it occurs after the carrier has physically stopped at a delivery point or set of delivery points. Route/access time is time spent driving along the curblines sections of a route or walking along a route. Driving time is spent driving along all sections of the route other than the curblines sections. Street support is driving time spent traveling to the route from the delivery unit or from the route back to the delivery unit. Street support time is also devoted to basic support functions. These functions include clocking in or out, obtaining, loading, and unloading the vehicle, checking or preparing the vehicle, preparing mail at the vehicle and at relay boxes, waiting for relay mail, unloading mail from relay boxes, obtaining mail or keys, attending safety meetings, and all training other than training specific to in-office activities (USPS LR-I-1, Summary Description of USPS Development of Costs By Segments and Components, Fiscal Year 1998, at 6-4 through 7-9).

In my view, these definitions leave little room for conflicting determinations of the activity categories one should assign tallies to. The information provided in levels 10, 11.1, 11.2, 11.3, 11.4, and 11.4.1 (defined in USPS-T-13 at pages 10-12 and Appendix D) identifies where the carriers were and what they were doing at the time tallies were recorded in sufficient detail to determine which activity categories should be chosen.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-12¹³. Based upon your knowledge and understanding of the 1986 Street Time Sampling (STS) study and the Engineered Standards/Delivery Redesign (ES) study:

- (a) Were the STS and ES studies designed for similar purposes? Please explain any similarities or dissimilarities you identify.
- (b) Were the route sampling procedures similar for both studies? Please explain any similarities or dissimilarities you identify.
- (c) Did the sampling procedures employed in the STS and ES studies yield a similar distribution of route types by ZIP code? Please explain any similarities or dissimilarities you identify.
- (d) Were the processes for observing and collecting data on carrier activities similar in both the STS and ES studies? Please explain any similarities or dissimilarities you identify.
- (e) In your opinion, assuming the Postal Service had implemented a "new STS" study between October 1996 and April 1998 using the same approach as in the 1986 STS study, would this new STS study have yielded results consistent with those of the ES study? Please explain your answer fully.

RESPONSE:

(a)-(e) The design, route sampling procedures, and data collection methods applied in the 1986 STS study are beyond the scope of my testimony.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

14

OCA/USPS-T12-13. Based upon your knowledge and understanding of the 1985 Load Time Variability (LTV) study and the Engineered Standards/Delivery Redesign (ES) study:

- (a) Were the processes for observing and collecting data on carrier activities similar in both the LTV and ES studies? Please explain any similarities or dissimilarities you identify.
- (b) Is the definition of load time under the ES study, as derived through the interpretation and assignment of ES tallies, consistent with the definition of load time applied in the LTV study? Please explain any similarities or dissimilarities you identify.

RESPONSE:

(a) The work-sampling procedure applied in the ES study to record tally data on carrier activities was different than the process used in the 1985 LTV study. The work-sampling procedure recorded data identifying the location and activity of the carrier only at the instant in time when the data collector received a signal to do the recording. In contrast, the LTV study directly measured the entire lengths of the time intervals that elapsed while the carrier conducted the preparation, load, and customer attend-time activities that occur during the load-time operation.

(b) Yes. Both studies define load time as strictly the time that a carrier spends at a delivery point or set of delivery points only while physically stopped at the place where the deliveries are located. Both studies exclude from load time all time expended while the carrier is moving between stops. (See Docket No. R97-1, Appendices to Opinion and Recommended Decision, Volume 2, Appendix K at 3 of 5; see also Docket No. R2000-1, USPS-T-13 at 11-12, 35).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

¹⁵
OCA/USPS-T12-14. Please provide estimates of Base Year 1998 accrued load time costs using street-time percentages developed from the 1986 STS study.

RESPONSE:

Base Year 1998 accrued load-time costs (in \$1,000) at 1986 street-time percentages are as follows:

Bus Foot	Bus Motorized	Res Foot	Res Curb	Res Park & Loop	Mixed Foot	Mixed Curb	Mixed Park & Loop	Total
37,851	14,509	291,917	382,455	952,323	20,919	49,660	153,403	1,883,038

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-~~15~~¹⁶ Please provide estimates of Base Year 1998 accrued load time costs predicted by the LTV model.

RESPONSE:

Base Year 1998 accrued load-time costs (in \$1,000) predicted by the LTV model are as follows:

SDR STOPS	MDR STOPS	BAM STOPS	TOTAL
775,629	608,944	77,577	1,462,151

I derived these costs by multiplying the averages of the model-predicted load times per stop presented in Table 1, column 3, at page 18 of my testimony (R2000-1, USPS-T-12) by the BY 1998 aggregate annual actual stops estimates reported at lines 56-58 of cs06&7.xls, sheet 7.0.4.1, USPS LR-I-80, and by multiplying the resulting time estimates (converted into hours) by the average BY 1998 city carrier wage rate of \$25.04/hour.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE

17

OCA/USPS-T12-16. Please refer to Docket No. R2000-1, USPS LR-I-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 1998. Confirm that the survey, "(1) Street Time Sampling (STS)" cited on page 7-2 refers to the 1986 STS study. Further confirm that the table appearing on page 7-3 shows the street time sampling percentages developed from the 1986 STS study. If you do not confirm, please explain.

RESPONSE:

Confirmed on both points.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T12-2. Refer to witness Raymond's response to UPS/USPS-T13-4 (a).

- (a) Describe how the activities in steps 2, 6, 7, and 11 are assigned to parcels. Provide the citations to the appropriate calculations in the base year workpapers.
- (b) If the costs of these activities are not assigned to parcels, provide an explanation as to why they are not, and provide any analyses or documentation that supports your explanation.

RESPONSE:

(a) According to my reading of the hypothesized sequence of activities that produce these steps, numbers 2 and 7 define driving time activities that the segment 7 functional analysis would assign to the deviation delivery category. The extent to which total deviation delivery cost is distributed to mail subclasses containing parcels is determined in those sections of the BY 1998 segment 7 workbook, cs06&7.xls, that apply the appropriate volume-variability and distribution key to that cost. Accrued and total volume-variable deviation delivery costs are calculated at cells E19 and E23, respectively, in sheet 7.0.4.4 of cs06&7.xls. The volume-variable cost is then distributed to subclasses containing parcels, and to other subclasses, in sheet 7.0.9, column (7)[c] of this workbook. This distribution is based, in part, on data obtained from the Motorized Letter Route (MLR) Survey, which is documented in R97-1, USPS LR-H-156 and WP 1.9, and, in part, on FY 1998 RPW piece distribution.

Steps 6 and 11 define route/access FAT activities. The segment 7 functional analysis calculates accrued costs by stop type for this activity at lines 19-22 of sheet 7.0.4.1 in cs06&7.xls. These costs are split into accrued route time costs and accrued access costs at lines 44-47 and line 54 of sheet 7.0.4.1. (The route-time costs are added to route/access CAT route-time costs and to driving time costs in line 54). The

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

accrued route/access FAT access costs are split into institutional costs and volume-variables costs for mail subclasses containing parcels, as well as for other subclasses, at column numbers (5), (11), and (17) in sheet 7.0.6.14 of cs06&7.xls.

(b) Please see my response to part (a).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T12-4. Refer to Table 3 on page 35 of your testimony. That table includes six types of routes, only one of which is a foot route. In USPS-LR-I-80, File Cs06&7.xls, Tabs Input LR and 7.0.4.1, there are eight types of routes, including three types of foot routes: business foot, residential foot, mixed foot, business motorized, residential curb, residential park & loop, mixed curb, and mixed park & loop.

- (a) Does the Engineered Standards Database and/or the City Carrier Route Master File provide sufficient information to calculate new street-time percentages for each of the three categories of foot routes?
- (b) If so, why did you not calculate new street-time percentages for each of the three categories of foot routes?
- (c) Provide documentation and analyses that support the use of the same street-time percentage for all three types of foot routes.

RESPONSE:

- (a) I am informed by Witness Raymond that the answer to your question is no.
- (b) Not applicable.
- (c) Once total accrued costs have been calculated for the three foot-route categories – business, residential, and mixed – and once these costs have been distributed across the street activities, all subsequent cost analyses are exactly the same for each set of costs. Specifically, the parameters that split accrued route/access FAT and route/access CAT foot route costs into route and access portions, and that determine the volume-variable access costs by mail subclass are the same for business foot costs as they are for residential and mixed foot costs. So, also, are the parameters applied to accrued driving time, load-time, collection box, and street support foot-route costs in order to derive volume-variable costs by subclass.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T12-7. Refer to page 3 of Library Reference USPS-LR-I-157, "Calculating Average Predicted Load Times and Predicted Load Times at Average Volumes," where you state that the first data set used in your analysis is based on the 1985 load-time field survey.

- (a) Provide the definition of "parcels" used in the 1985 load-time study, including a page and line number if you include a reference in your answer.
- (b) Does the definition of parcels used in the 1985 load-time study match exactly the definition of parcels used in the FY 1998 City Carrier Cost system? If not, explain all differences and indicate the effect of those differences on your analysis.
- (c) In the 1985 load-time survey, were the characteristics of parcels, such as weight and class/subclass of mail, recorded? If so, provide (i) a table that shows the distribution of parcels by weight, class and subclass, and (ii) the files and programs that were used to perform this calculation. If not, (i) identify any studies that were performed between FY1983 and FY1987 that collected the characteristics of parcels, such as weight and class/subclass of mail, (ii) provide a table that shows the distribution in each study of parcels by class and subclass, and (iii) provide the files and programs that were used to perform this calculation for each study.

RESPONSE:

(a) A parcel was defined in the 1985 load-time study as "mail which is too large or cumbersome to case in a letter or flat case." (Docket No. R87-1, USPS LR-E-4, Load Time Variability Test, at 38).

(b) Yes.

(c) Weight, class/subclass, and other characteristics of parcels were not recorded in the 1985 load-time survey. I am unaware of any studies from FY 1983 through FY 1987 that collected data on these characteristics.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T12-11. Refer to USPS-LR-I-159, "Calculation of Street Time Proportions." Provide an electronic version of the following input files: ALDRAN.FOS.STS.SAS.DATA and ALDRAN.HQ059TOI .CITY.PQ4FY97.

RESPONSE:

ALDRAN.FOS.STS.SAS.DATA is a mainframe SAS data set that is composed of a subset of the data in the Engineered Standards Database. The Engineered Standards database is documented in USPS LR-I-163. An extract of the ALDRAN.HQ059TOI .CITY.PQ4FY97 file containing the specific data that were input into the estimation of street-time proportions has been included in USPS LR-I-290, which is being filed in response to this interrogatory plus interrogatories 6, 8, and 10. These extracted data are contained in the Excel workbook ESCMF.xls, which will be included in LR-I-290.

1 CHAIRMAN GLEIMAN: Is there any additional
2 designated written cross-examination for this witness?

3 [No response.]

4 CHAIRMAN GLEIMAN: If not, then we will proceed to
5 oral cross-examination. The following parties have
6 requested oral cross-examination, Advo, Inc., the Newspaper
7 Association of America, Office of the Consumer Advocate, and
8 the periodicals mailers as a group, and unless someone
9 insists, I am not going to read the long list of the members
10 of the group, and, lastly, United Parcel Service.

11 Is there any other party that wishes to
12 cross-examine Witness Baron?

13 [No response.]

14 CHAIRMAN GLEIMAN: If not, Mr. McLaughlin, when
15 you are ready.

16 MR. McLAUGHLIN: Yes.

17 CROSS-EXAMINATION

18 BY MR. McLAUGHLIN:

19 Q Good morning, Mr. Baron.

20 A Good morning.

21 Q My questions today I believe are going to deal
22 entirely with the use you made of information given to you
23 by Mr. Raymond, particularly from Library Reference 163.
24 Now that data set that was given to you, just so the record
25 is clear, was data that was collected in a work sampling of

1 carrier routes, is that correct?

2 A Yes.

3 Q And work sampling was done at various cities and
4 zip codes, is that correct?

5 A Correct.

6 Q And there is a term called CY code that has been
7 used in the testimony. Can you tell us what that CY code
8 is?

9 A My understanding is that is a code which
10 represents one of the cities where the ES routes are
11 located.

12 Q Right. And a CY code, or a city code, can we call
13 it city code, just so we don't have to use CY all the time?

14 A Sure.

15 Q A city code may represent more than one zip code,
16 is that correct?

17 A In a few cases, yes.

18 Q And a city code can have more -- several routes
19 within a city code that were observed, is that correct?

20 A Yes.

21 Q Okay. How many city codes were included in the
22 data set that Mr. Raymond gave to you?

23 A I don't know how many city codes, we didn't use
24 that information.

25 Q Can you tell us how many unique carrier routes

1 were included in the database?

2 A 340.

3 THE REPORTER: 340?

4 THE WITNESS: 340, yes.

5 BY MR. McLAUGHLIN:

6 Q Can you tell us how many zip codes were included?

7 A 76.

8 Q And how many, the next term I am going to use is
9 route days, and let me just clarify for the record what a
10 route day is. Some routes were observed for just a single
11 day, is that correct?

12 A Right.

13 Q And there were other routes observed for multiple
14 days, sometimes 10, 15, 20 days of observations for a single
15 route, right?

16 A Correct.

17 Q So, for the route that is observed 20 days, that
18 is 20 route days of observations and you simply add up the
19 combined total of observation days for routes, is that
20 correct? That is what route days are?

21 A Correct.

22 Q How many total route days are in the database that
23 you used?

24 A 861, although we didn't use all of those.

25 Q Well, I thought I knew the answer and now I am a

1 little confused. I had thought the answer was 844. Do
2 you --

3 A Well, that is how many that we actually used.

4 Q I do recall that there were an additional 17
5 things that were sort of dangling out there, because I
6 believe they did not have dates associated with them, is
7 that correct? They were undated?

8 A There were a few like that, yes. But we didn't --

9 Q Those were not parts of existing routes of
10 existing routes that were already in the 844?

11 A I actually don't recall, because we did not do the
12 analysis at the route day level. We aggregated to the
13 individual route level, so the only numbers that were
14 relevant to us were the total number of routes, the 340
15 routes, so the exact number of route days was never an issue
16 to us. I am speaking from memory here, I mean I could take
17 some time and check, but it is simply not a relevant number
18 for us, any more than the number of city codes.

19 Q I will try --

20 A I thought it was 861, but I'm sure we can resolve
21 that very quickly. When I look at the initial dataset that
22 we use before we aggregate to the route level, it's only at
23 that level that we do any analysis.

24 So that's the number I remember.

25 MR. McLAUGHLIN: Mr. Chairman, I'll try to resolve

1 this with Mr. Raymond, and I hope that that doesn't relate
2 back to Mr. Baron once again, but we'll -- for the moment,
3 I'm going to go on.

4 I thought I knew the answer, and suddenly, --

5 CHAIRMAN GLEIMAN: You're in the club. I jokingly
6 said at one time that we could have a panel of witnesses up
7 here so that they could bounce these things back and forth,
8 but obviously that would be difficult, but recalling
9 witnesses to resolve outstanding issues is not out of the
10 question at this stage of the game.

11 MR. McLAUGHLIN: I'm hoping that we won't come to
12 recalling Mr. Baron.

13 MR. COOPER: Mr. Chairman, if I might suggest that
14 if we do have a break during this witness's oral cross, he
15 might be able to check on that.

16 CHAIRMAN GLEIMAN: Thank you, Mr. Cooper.

17 BY MR. McLAUGHLIN:

18 Q Could you turn to page 32 of your testimony?

19 [Pause.]

20 A Okay, I'm there.

21 Q Down at line 18, you're referring to the dataset
22 that Mr. Raymond gave you, you state that to distinguish
23 this new dataset from others used in my analyses, I refer to
24 it as the engineered standards or ES dataset; do you see
25 that statement?

1 A Yes.

2 Q ENGINEERED STANDARDS is in all caps, or at least
3 it's in initial caps; it's a title for a study; is that
4 correct?

5 A Correct.

6 Q What was your understanding when you received this
7 dataset as to whether that represented the entire
8 Engineering Standards dataset?

9 A This dataset is the dataset that -- well, let me
10 start again.

11 The dataset that I received that I refer to as the
12 ES dataset, is the dataset that consists of approximately
13 39,000 tallies of work sampling data.

14 And I was aware that there were other data in the
15 entire database in addition to these 39,000-plus tallies.

16 Q But those are not mentioned anywhere? That is not
17 mentioned anywhere in your testimony?

18 A No.

19 Q So, when you refer to Engineered Standards, or ES
20 dataset, you're referring to a subset of the entire
21 Engineered Standards database; is that correct?

22 A Yes.

23 Q Okay. I raise that only because I think we may
24 run into confusion later on when we start referring to
25 Engineered Standards datasets as to whether we're talking

1 about one of different datasets.

2 Did you ask Mr. Raymond to provide you with the
3 entire dataset?

4 A No, I did not.

5 Q Can you refer now to page 31?

6 [Pause.]

7 In the second paragraph on page 31, you talk about
8 the different kinds of STS activities, and, again, let me
9 define STS:

10 STS refers to street time sample. Basically it's
11 the division of street activities among different kinds of
12 categories; is that correct, such as load, street support,
13 access types; is that correct?

14 A Yes.

15 Q Okay. One of those categories is collection; is
16 it not?

17 A Correct.

18 Q And starting on line 16, you discuss collection.
19 You state that collection activity includes all work
20 involved in obtaining mail from collection boxes.

21 Thus, it includes vehicle and walking time spent
22 in accessing the boxes, as well as opening and sweeping the
23 boxes.

24 Now, collection boxes are those -- I guess there
25 are two different kinds of boxes that can be used to collect

1 mail from.

2 There are green boxes and blue boxes that we see
3 on our street corners; is that correct?

4 A Yes.

5 Q The green box is a collection box; is that
6 correct?

7 A I'm trying to think about the colors. I thought
8 the one outside -- ours, at my place of business, it's blue.

9 Q Okay. Well, let me just -- the important aspect
10 here is that carriers do pick up mail from these boxes that
11 is collection mail that people have dropped off to send
12 their letters to their aunt.

13 And the time that you allocate to that activity is
14 supposed to include the time the carrier spends not only at
15 the collection box, but also traveling to the collection box
16 and going back from the collection box; is that correct?

17 A Correct.

18 Q Have you taken a look at the tallies that are
19 contained in Mr. Raymond's assignment of collection box STS
20 categories?

21 A Yes, I have.

22 Q Would you agree that he shows a total of 74
23 tallies for collection box activities; is that correct?

24 A I don't remember the exact number.

25 Q Okay, well, it's -- I believe it's shown on

1 Library Reference 281, Part 2, page 1. It's just one page
2 of collection activity.

3 Do you recall, in looking at that, whether there
4 were any activities shown for walking to or from a
5 collection box or for driving to or from a collection box?

6 A Well, first of all, virtually all of the time
7 spent driving to a collection box could be expected to be
8 included in driving time.

9 I don't recall specifically whether I saw any for
10 walking, although in discussing the matter with Mr. Raymond,
11 he did assure me that he identified collection time as time
12 spent walking up to the box, and sweeping the box.

13 Q Mr. Raymond told you that tallies -- walking
14 tallies indicated collection box?

15 A If the activity is the activity of walking up to a
16 collection box, there is some access time that is in the
17 collection box analysis.

18 Q So that was the understanding that you had from
19 your discussions with Raymond?

20 A Right, and it's also in the Segment 7 analysis.
21 It's been in that analysis for many years, where some
22 portion of accrued cost for collection boxes is analyzed as
23 access time.

24 Q Well, but I am getting more to the point that you
25 said, that if there was a walking activity, walking to a

1 collection box, that that would have been identified as a
2 collection box activity? Was that your understanding from
3 Mr. Raymond?

4 A Yes. We went over the definitions from the
5 similar description and that was my understanding, yes.

6 Q Okay, well, I'll take it up with him then.

7 [Pause.]

8 BY MR. McLAUGHLIN:

9 Q I would like to next refer you to your Library
10 Reference LR-262, which is actually -- it includes
11 spreadsheets in it. I'll tell you what, rather than that I
12 would like to refer you to just the term "City Carrier Route
13 Master File" which is mentioned on page 34 of your testimony
14 in line 4.

15 A Okay.

16 Q This calculates the total number of routes on each
17 of the routes that were surveyed by Mr. Raymond, is that
18 correct?

19 A Yes. The CRMF is the source of the data that
20 shows the total number of routes by type in each of the zip
21 codes included in Mr. Raymond's analysis.

22 Q And so can you explain how you used this
23 information in doing what you call an inflation factor?

24 A The easiest way to understand it is to focus on a
25 particular route type, say residential park and loop --

1 Q Let's take an example like foot routes.

2 A Okay. We would determine the total number of foot
3 routes in a particular zip code, one of the 76, and divide
4 that by the number of foot routes in that zip code included
5 in Mr. Raymond's dataset. That would determine the
6 inflation factor.

7 For example, if there were a total of 20 foot
8 routes in the entire zip according to the CRMF and there
9 were two of those 20 routes in Mr. Raymond's dataset, then
10 the inflation factor would be 20 divided by two, or 10, and
11 the same procedure of course was applied to the other route
12 types.

13 Q Okay, and after you did that inflation factor for
14 each route, and each route might have an -- different routes
15 had different inflation factors depending upon how many of
16 that route type were sampled in that particular route?

17 A Correct.

18 Q That then led to your final allocation of weighted
19 tallies by STS activity, correct?

20 A Correct. Each of those weights was multiplied by
21 the average daily tally account for a particular activity
22 category for a particular route.

23 Q Mr. Baron, at this time I would like to refer you
24 now to USPS Library Reference 262 and to a particular
25 spreadsheet that is on there. I happen to have copies I

1 have made of that spreadsheet so that people won't have to
2 have a computer in front of them.

3 A Okay.

4 Q The particular spreadsheet is titled
5 "ES.CONFINT.xls. There is a worksheet on that spreadsheet
6 called "FOOT" -- are you familiar with that?

7 A Yes.

8 Q Okay, and let me provide you a copy.

9 MR. McLAUGHLIN: Mr. Chairman, I guess I probably
10 ought to mark this for identification. We are not proposing
11 to introduce -- well, actually I think -- let me just
12 inquire of the status.

13 What is the status of this Library Reference? Is
14 this considered evidence or is this just considered floating
15 out there?

16 MR. COOPER: This is a floater. However, the
17 Postal Service has no objection to having that spreadsheet
18 come into evidence.

19 MR. McLAUGHLIN: Okay. I will identify this then
20 as ADVO-XE-T12-1.

21 CHAIRMAN GLEIMAN: Sounds pretty reasonable to me.

22 MR. McLAUGHLIN: I guess I need to give two copies
23 of this to the reporter?

24 CHAIRMAN GLEIMAN: Two copies.

25 MR. McLAUGHLIN: Bear with me for one second.

1 CHAIRMAN GLEIMAN: Certainly.

2 MR. McLAUGHLIN: I am handing two copies of this
3 to the reporter.

4 [ADVO-XE-T12-1 was marked for
5 identification.]

6 MR. COSTICH: Mr. Chairman, Rand Costich, OCA.
7 Could I get a clarification of what Library Reference this
8 is from?

9 MR. McLAUGHLIN: This is Library Reference 262. I
10 hope I have the right number.

11 THE WITNESS: I don't think that is the right
12 number.

13 MR. COSTICH: I don't think that is correct.

14 MR. McLAUGHLIN: Okay. Well, --

15 THE WITNESS: It is 292.

16 MR. McLAUGHLIN: 292, okay. Perhaps then we
17 should -- it says 262 on the copies I handed to the
18 reporter. If it is, in fact, 292, we should amend that. Is
19 that correct, 292?

20 MR. COOPER: I believe the witness has confirmed
21 that, yes.

22 THE WITNESS: Yes, it is.

23 CHAIRMAN GLEIMAN: Thank you, Mr. Costich.

24 MR. COSTICH: Also, if that is 292, then I believe
25 it is in evidence as being cited in the response of the

1 witness to Advo Interrogatory 23(a).

2 MR. McLAUGHLIN: I wasn't sure what the status was
3 of Library References cited in the interrogatories that have
4 designated for inclusion in the record. Are they, in fact,
5 in the record without further designation?

6 CHAIRMAN GLEIMAN: The Library References aren't,
7 but the portions of the Library References that are part of
8 a response are bootstrapped in as evidence.

9 MR. McLAUGHLIN: Okay.

10 CHAIRMAN GLEIMAN: If you want to be doubly sure,
11 though, you can always submit this. A few more pages in the
12 transcript of the proceedings at this point in time is not
13 going to make much difference.

14 MR. McLAUGHLIN: Well, I would also just note, and
15 I do apologize for the error in the number, the additional
16 pages of this cross-examination exhibit also have the
17 incorrect Library Reference number, but I think the record
18 is clear now, so we don't need to make all those
19 corrections.

20 I do think it would be useful, Mr. Chairman, to
21 have this in the record simply for ease of following the
22 cross-examination when someone is reviewing it. But I take
23 it that it is already considered in the evidentiary record?

24 CHAIRMAN GLEIMAN: Well, we can transcribe it into
25 the record or we can transcribe it and admit it into

1 evidence just to be doubly sure.

2 MR. McLAUGHLIN: Well, I think it would be best to
3 have it in evidence just to make sure there is no question
4 about it.

5 CHAIRMAN GLEIMAN: All right. Well, the
6 cross-examination exhibit in question will be received and
7 transcribed into the record and received into evidence.

8 [Cross-Examination Exhibit No.
9 ADVO-XE-T12-1 was received into
10 evidence and transcribed into the
11 record.]
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ES.CONFINT.xls
FOOT

USPS-LR-I-262
292

Index	ZIP5	ROUT NUM	DAYS	ROUTE TYPE	RTTYP	LTT	SST	DTT	RAFT	RACT	CBT	TT	LTT MEAN	SST MEAN	DTT MEAN	RAFT MEAN	RACT MEAN	CBT MEAN	TT MEAN
1	10019	46	1	FOOT	1	32	1	0	3	0	0	36	32.0	1.0	-	3.0	-	-	36.0
2	20003	05	3	FOOT	1	43	16	6	38	0	1	104	14.3	5.3	2.0	12.7	-	0.3	34.7
3	20003	20	4	FOOT	1	61	27	5	52	0	0	145	15.3	6.8	1.3	13.0	-	-	36.3
4	20024	17	3	FOOT	1	59	26	3	19	0	1	108	19.7	8.7	1.0	6.3	-	0.3	36.0
5	32304	98	3	FOOT	1	75	15	37	1	16	0	144	25.0	5.0	12.3	0.3	5.3	-	48.0
6	36201	02	3	FOOT	1	50	19	32	18	11	1	131	16.7	6.3	10.7	6.0	3.7	0.3	43.7
7	53208	49	1	FOOT	1	15	5	0	32	0	0	52	15.0	5.0	-	32.0	-	-	52.0
8	60606	10	1	FOOT	1	2	10	1	9	0	0	22	2.0	10.0	1.0	9.0	-	-	22.0
9	60606	26	1	FOOT	1	3	12	0	17	0	0	32	3.0	12.0	-	17.0	-	-	32.0
10	60606	28	1	FOOT	1	4	7	1	11	0	0	23	4.0	7.0	1.0	11.0	-	-	23.0
11	63301	05	3	FOOT	1	27	21	11	34	0	0	93	9.0	7.0	3.7	11.3	-	-	31.0
12	731	04	1	FOOT	1	15	1	0	26	0	0	42	15.0	1.0	-	26.0	-	-	42.0
13	8629	34	1	FOOT	1	15	2	0	25	0	4	46	15.0	2.0	-	25.0	-	4.0	46.0
14	8629	47	1	FOOT	1	19	7	0	16	0	0	42	19.0	7.0	-	16.0	-	-	42.0
15	90247	32	1	FOOT	1	17	4	3	17	0	0	41	17.0	4.0	3.0	17.0	-	-	41.0
16	90248	11	1	FOOT	1	6	9	11	20	0	1	47	6.0	9.0	11.0	20.0	-	1.0	47.0
17	90248	17	1	FOOT	1	8	9	0	20	0	0	37	8.0	9.0	-	20.0	-	-	37.0
18	94122	01	1	FOOT	1	7	11	0	7	0	0	25	7.0	11.0	-	7.0	-	-	25.0
19	94122	02	1	FOOT	1	21	13	1	9	0	0	44	21.0	13.0	1.0	9.0	-	-	44.0
20	94122	03	1	FOOT	1	14	8	2	11	0	0	35	14.0	8.0	2.0	11.0	-	-	35.0
21	94122	06	1	FOOT	1	17	17	0	16	0	0	50	17.0	17.0	-	16.0	-	-	50.0
22	94122	07	1	FOOT	1	20	4	0	20	0	0	44	20.0	4.0	-	20.0	-	-	44.0
23	94122	10	1	FOOT	1	16	5	0	25	0	0	46	16.0	5.0	-	25.0	-	-	46.0
24	94122	11	1	FOOT	1	14	5	1	22	0	0	42	14.0	5.0	1.0	22.0	-	-	42.0
25	94122	13	1	FOOT	1	18	13	0	9	0	0	40	18.0	13.0	-	9.0	-	-	40.0
26	94122	14	4	FOOT	1	74	35	6	35	0	0	150	18.5	8.8	1.5	8.8	-	-	37.5
27	94122	16	1	FOOT	1	12	8	0	14	0	0	34	12.0	8.0	-	14.0	-	-	34.0
28	94122	19	4	FOOT	1	60	33	0	39	0	0	132	15.0	8.3	-	9.8	-	-	33.0
29	94122	21	1	FOOT	1	22	4	0	12	0	0	38	22.0	4.0	-	12.0	-	-	38.0
30	94122	24	1	FOOT	1	15	26	0	10	0	0	51	15.0	26.0	-	10.0	-	-	51.0
31	94122	25	1	FOOT	1	10	7	0	13	0	0	30	10.0	7.0	-	13.0	-	-	30.0
32	94122	27	2	FOOT	1	21	20	1	24	0	3	69	10.5	10.0	0.5	12.0	-	1.5	34.5
33	94611	11	1	FOOT	1	25	3	0	15	0	0	43	25.0	3.0	-	15.0	-	-	43.0
34	96001	03	1	FOOT	1	16	3	0	28	0	1	48	16.0	3.0	-	28.0	-	1.0	48.0
35	96001	04	1	FOOT	1	10	3	0	23	0	0	36	10.0	3.0	-	23.0	-	-	36.0
36	98011	33	19	FOOT	1	521	92	18	8	128	0	767	27.4	4.8	0.9	0.4	6.737	-	40.4

ADVO-XE-712-1

Index	ZIP5	ROUT NUM	FOOT	RESLOOP	RESCURB	MIXLOOP	MIXCURB	BUSMOT	FOOT SAM	RLOOP SAM	RCURB SAM	MLOOP SAM	MCURB SAM
1	10019	46	61	0	0	0	0	0	1				
2	20003	05	11	15	0	0	0	0	2				
3	20003	20	11	15	0	0	0	0	2				
4	20024	17	3	10	0	0	0	2	1	1			
5	32304	98	1	1	17	0	0	0	1	1	1		
6	36201	02	1	4	6	1	0	1	1			1	
7	53208	49	5	26	0	0	0	0	1	2			
8	60606	10	35	0	0	0	0	0	3				
9	60606	26	35	0	0	0	0	0	3				
10	60606	28	35	0	0	0	0	0	3				
11	63301	05	9	13	20	2	0	0	1	2			
12	731	04	18	14	20	0	0	0	1	1	1		
13	8629	34	6	2	0	0	0	0	2	1			
14	8629	47	6	2	0	0	0	0	2	1			
15	90247	32	3	21	3	1	0	0	1				
16	90248	11	8	3	0	2	0	0	2	1			
17	90248	17	8	3	0	2	0	0	2	1			
18	94122	01	48	5	0	0	0	0	15	3			
19	94122	02	48	5	0	0	0	0	15	3			
20	94122	03	48	5	0	0	0	0	15	3			
21	94122	06	48	5	0	0	0	0	15	3			
22	94122	07	48	5	0	0	0	0	15	3			
23	94122	10	48	5	0	0	0	0	15	3			
24	94122	11	48	5	0	0	0	0	15	3			
25	94122	13	48	5	0	0	0	0	15	3			
26	94122	14	48	5	0	0	0	0	15	3			
27	94122	16	48	5	0	0	0	0	15	3			
28	94122	19	48	5	0	0	0	0	15	3			
29	94122	21	48	5	0	0	0	0	15	3			
30	94122	24	48	5	0	0	0	0	15	3			
31	94122	25	48	5	0	0	0	0	15	3			
32	94122	27	48	5	0	0	0	0	15	3			
33	94611	11	8	13	26	0	1	0	1	1	2		
34	96001	03	2	5	20	1	0	0	2	4	18	1	
35	96001	04	2	5	20	1	0	0	2	4	18	1	
36	98011	33	4	3	21	1	1	1	1	1	3		

ES.CONFINT.xls
FOOT

USPS-LR-I-262

Index	ZIP5	ROUT NUM	BUSMOSAM	WEIGHTED LTT	WEIGHTED SST	WEIGHTED DTT	WEIGHTED RAFT	WEIGHTED RACT	WEIGHTED CBT	WEIGHTED TT
1	10019	46		1,952.00	61.00	-	183.00	-	-	2,196.0
2	20003	05		78.83	29.33	11.00	69.67	-	1.83	190.7
3	20003	20		83.88	37.13	6.875	71.50	-	-	199.4
4	20024	17		59.00	26.00	3.00	19.00	-	1.00	108.0
5	32304	98		25.00	5.00	12.33	0.33	5.33	-	48.0
6	38201	02		16.67	6.33	10.67	6.00	3.67	0.33	43.7
7	53208	49		75.00	25.00	-	160.00	-	-	260.0
8	60606	10		23.33	116.67	11.67	105.00	-	-	256.7
9	60606	26		35.00	140.00	-	198.33	-	-	373.3
10	60606	28		46.67	81.67	11.67	128.33	-	-	268.3
11	63301	05		81.00	63.00	33.00	102.00	-	-	279.0
12	731	04		270.00	18.00	-	488.00	-	-	756.0
13	8829	34		45.00	6.00	-	75.00	-	12.00	138.0
14	8829	47		57.00	21.00	-	48.00	-	-	126.0
15	90247	32		61.00	12.00	9.00	51.00	-	-	123.0
16	90248	11		24.00	36.00	44.00	80.00	-	4.00	188.0
17	90248	17		32.00	36.00	-	80.00	-	-	148.0
18	94122	01		22.40	35.20	-	22.40	-	-	80.0
19	94122	02		67.20	41.60	3.20	28.80	-	-	140.8
20	94122	03		44.80	25.60	6.40	35.20	-	-	112.0
21	94122	06		54.40	54.40	-	51.20	-	-	160.0
22	94122	07		64.00	12.80	-	64.00	-	-	140.8
23	94122	10		51.20	16.00	-	80.00	-	-	147.2
24	94122	11		44.80	16.00	3.20	70.40	-	-	134.4
25	94122	13		57.60	41.60	-	28.80	-	-	128.0
26	94122	14		59.20	28.00	4.80	28.00	-	-	120.0
27	94122	16		38.40	25.60	-	44.80	-	-	108.8
28	94122	19		48.00	26.40	-	31.20	-	-	105.6
29	94122	21		70.40	12.80	-	38.40	-	-	121.6
30	94122	24		48.00	83.20	-	32.00	-	-	163.2
31	94122	25		32.00	22.40	-	41.60	-	-	96.0
32	94122	27		33.60	32.00	1.60	38.40	-	4.80	110.4
33	94611	11		200.00	24.00	-	120.00	-	-	344.0
34	96001	03		16.00	3.00	-	28.00	-	1.00	48.0
35	96001	04		10.00	3.00	-	23.00	-	-	36.0
36	96011	33		109.88	19.37	3.79	1.88	28.95	-	161.5
			Sum of Weighted Tallies	4,027.06	1,243.09	176.20	2,653.06	35.95	24.97	8,160.32
			Ratio of TI to TT	49.35%	15.23%	2.16%	32.51%	0.44%	0.31%	100.00%
			x bar	226.7	226.7	226.7	226.7	226.7	226.7	
			y bar	111.9	34.5	4.9	73.7	1.0	0.7	
			Sum of Squared Errors	824,497.23	107,536.52	5,504.17	354,560.53	850.33	227.30	
			Variance	0.01274	0.00166	0.00009	0.00548	0.00001	0.00000	
			Standard Error	0.1127	0.0407	0.0092	0.0739	0.0036	0.0019	
			Upper Bound 95% CONF. INT.	0.7146	0.2321	0.0398	0.4700	0.0115	0.0067	
			Lower Bound 95% CONF. INT.	0.2725	0.0725	0.0035	0.1602	(0.0027)	(0.0006)	
			Standard Error x	360.74	360.74	360.74	360.74	360.74	360.74	
			Standard Error y	319.24	30.47	9.35	82.84	4.57	2.21	
			Standard Error x bar	10.0206	10.0206	10.0206	10.0206	10.0206	10.0206	
			Standard Error y bar	8.8679	0.8464	0.2597	2.3011	0.1270	0.0614	
			Coefficient of Variation x bar	0.0442	0.0442	0.0442	0.0442	0.0442	0.0442	
			Coefficient of Variation y bar	0.0793	0.0245	0.0531	0.0312	0.1272	0.0886	

Index	ZIP5	ROUT NUM	LTT SQUARED ERROR	STT SQUARED ERROR	DTT SQUARED ERROR	RAFT SQUARED ERROR	RACT SQUARED ERROR	CBT SQUARED ERROR
1	10019	48	753926.1031	74816.17098	2248.287184	281913.4437	93.58042058	45.14107666
2	20003	05	232.8477173	0.083127661	47.37732495	58.94923945	0.705455899	1.562461045
3	20003	20	210.6905709	45.60854876	6.605353401	44.6217818	0.771368184	0.372090552
4	20024	17	32.52131926	91.16294365	0.446304593	259.6143226	0.226343398	0.448326118
5	32304	98	1.722214861	5.345490402	127.6203043	233.2414736	26.23372026	0.021566999
6	36201	02	23.83911336	0.101495993	94.55256868	67.18657264	12.07082087	0.039893748
7	53208	49	2841.764457	213.3597212	31.5161972	5695.688134	1.311798159	0.632781739
8	60606	10	10677.06663	6016.733885	37.51208798	464.5535196	1.278377923	0.616660574
9	60606	26	22271.80723	6910.371226	64.98014098	5922.320033	2.704667342	1.304670305
10	60606	28	7353.744786	1663.854983	34.48982909	1688.701584	1.397235375	0.673994718
11	63301	05	3213.140609	420.2014562	727.6949994	127.5222444	1.510527818	0.728644428
12	731	04	10625.64587	9440.9398	266.4591906	49378.23428	11.09082652	5.349963668
13	8629	34	533.7045274	225.6632188	8.878616265	908.0556479	0.369554499	134.0451269
14	8629	47	26.8337356	3.261335812	7.401644183	49.49623879	0.308078514	0.148610102
15	90247	32	94.08320348	45.38826217	40.24861747	121.2356245	0.293582757	0.141617676
16	90248	11	4730.234503	54.18740276	1595.259324	356.3845748	0.68586086	11.72932224
17	90248	17	1684.033467	181.0254282	10.21199384	1016.512904	0.425053652	0.20503626
18	94122	01	291.7075075	529.6110824	2.983781984	13.0270289	0.124193909	0.05990833
19	94122	02	5.215863939	406.0778658	0.025549338	288.1969249	0.384703051	0.185572044
20	94122	03	109.6465678	72.90756684	15.85387266	1.471409246	0.243420061	0.117420327
21	94122	06	603.1392678	901.5943733	11.93512793	0.670097983	0.496775634	0.239633321
22	94122	07	30.07235418	74.79873525	9.242563073	332.1009195	0.384703051	0.185572044
23	94122	10	459.7671841	41.26217139	10.10189228	1033.165537	0.420470897	0.202825643
24	94122	11	463.3458951	20.01389015	0.088822252	713.1239161	0.350524888	0.169085271
25	94122	13	30.99277044	488.4652031	7.638481878	164.2210495	0.317936406	0.153365326
26	94122	14	0.000367504	94.47686127	4.879486223	121.3070141	0.279436294	0.134793743
27	94122	16	233.8467268	81.46978743	5.518803157	88.8750282	0.229709053	0.110806448
28	94122	19	16.91569923	106.3689082	5.198941728	9.811132795	0.216395466	0.104384275
29	94122	21	107.9778825	32.76204146	6.893729895	1.286256067	0.286937606	0.138412206
30	94122	24	1058.726113	3403.449696	12.4173071	443.4800924	0.51684537	0.249314507
31	94122	25	236.4009669	60.46519122	4.296646057	107.9280573	0.178839228	0.086267996
32	94122	27	436.042754	230.5030586	0.614280616	6.28589821	0.236514879	19.91148533
33	94611	11	914.3595157	806.7243632	55.17012888	66.58593416	2.296345369	1.107705027
34	96001	03	59.10024172	18.59361705	1.074161514	153.6216834	0.044709807	0.72785286
35	96001	04	60.30689045	6.17037397	0.604215852	127.5954613	0.025149266	0.012131437
36	98011	33	899.8838253	27.34777503	0.091765612	2582.012112	688.3305036	0.244067948

1 BY MR. McLAUGHLIN:

2 Q Now, this is a printout of your spreadsheet. I
3 would note, as you probably have already noted, that there
4 have been some sight modifications made, for example, some
5 numbers are shown in bold and they were not in bold in your
6 spreadsheet. Also, I think in a couple of places I put a
7 space between a word, for example, on page 1, one of the
8 captions is LTT Mean, I believe in your spreadsheet that was
9 all one word, but I broke it for ease of understanding.
10 Does this appear to be a replication of your spreadsheet?
11 And, in fact, if you want to really double check, the best
12 way to go is to page 3 of the printed spreadsheet, and you
13 can compare the numbers for the ultimate results with your
14 results.

15 A The upper and lower 95 percent confidence interval
16 results in the straight time percentages. Those look fine.
17 I mean it would take quite a bit longer to check every other
18 number.

19 Q No, I understand. I am not asking you to check
20 every other number. I will simply represent to you that
21 this was simply a copy with only the emboldened numbers
22 being the edits, along with the headings being slightly
23 edited by putting in spaces for easier understanding.

24 This Library Reference really does track through
25 the method by which you determined the proportion of load

1 time on foot routes, is that correct?

2 A Yes.

3 Q And that is foot routes throughout the country,
4 that is the Postal Service system foot routes? That is what
5 this number is used to represent, your final conclusion?

6 A Right. Well, the one set of numbers at the bottom
7 of page 3 that show the street time percentages are the
8 numbers that are reported as street time results.

9 Q And, in fact, on page 3, under the -- down toward
10 the bottom, there is a line that says ratio of TI to TT.

11 A Yeah.

12 Q And the very first number there is 49.35 percent.

13 A Right.

14 Q That 49.35 percent means that, by your
15 calculations, 49.35 percent of street time on foot routes is
16 the load activity, is that correct?

17 A Correct.

18 Q Okay. Now, let's look at the way you got there.
19 Back to page 1 of this exhibit, the second column is the zip
20 codes that were surveyed by Mr. Raymond, is that correct?

21 A Yes.

22 Q And the third column is the route number, the
23 specific carrier route that was surveyed?

24 A Correct.

25 Q Okay. Let's just take a look at the very first

1 entry, very first row, zip code 10019, route 46. I believe
2 Mr. Raymond would refer to that as Route 1946, is that
3 correct?

4 A Yes.

5 Q 10019 is New York City, is that correct?

6 A Yes, I believe this is the Radio City Station
7 route.

8 Q Okay. So that is downtown New York City?

9 A Correct.

10 Q That route was surveyed one day, is that correct?

11 A Correct.

12 Q On that one day, to find out how many load tallies
13 there were out of total tallies, we would go over to the
14 columns LTT and TT and compare those two?

15 A Yes.

16 Q On that day there were a total of 36 tallies taken
17 and 32 of them indicated the carrier was loading mail, is
18 that correct?

19 A Correct.

20 Q That is 89 percent of his time on that route, that
21 day, was spent loading mail, is that correct?

22 A That is 32 divided by 36?

23 Q Would you accept that that is 89 percent?

24 A I will accept that, yes.

25 Q It is a high number, isn't it?

1 A Yes, it is.

2 Q In fact, it is high in relation to I believe every
3 single other entry on this page, is that correct?

4 A Yes, it is.

5 Q Now, then, the next step -- those are just the raw
6 tallies, that is just the number of tallies that were taken
7 on that route.

8 A Right.

9 Q Some routes were surveyed more than one day, some
10 routes were only surveyed one day.

11 A Correct.

12 Q So your next step then was to normalize or average
13 for routes that had more than one observation day, is that
14 correct?

15 A Correct.

16 Q And starting with the column on page 1 captioned
17 "LTT Mean," all the way over through the column "TT Mean,"
18 that is where you did this averaging, is that correct?

19 A Yes.

20 Q LTT Mean means load time tallies mean, or average
21 load time tallies for that route?

22 A Correct. It is the average over all the days.

23 Q Okay. So, for example, for that one New York City
24 route, observed one day, the numbers are the same as the
25 actual tallies counted because it was only one day?

1 A Yes.

2 Q Whereas, for another route further down that was
3 observed five days, it is the average of those five days, is
4 that correct?

5 A Correct.

6 Q Okay.

7 A Incidentally, that is exactly the reason why we
8 focused solely on the number of routes, because we did this
9 averaging over route days.

10 Q No, I am not questioning that at all. I just
11 wanted to follow -- I want to make sure that we understand
12 the procedure you used. Now, turn to the second page of
13 this exhibit that I have given to you. Now, this page is
14 obviously a little difficult to fathom unless you know what
15 all these different things mean. The column starting with
16 -- in the first place, the first three columns here are
17 simply replications of -- no, excuse me, the first two
18 columns are simply replications of the zip code and route.
19 The column entitled "FOOT" has a bunch of numbers for each
20 route. Can you explain to us what -- for example, for this
21 New York City route, the very first one, the number is 61.
22 What does that number represent?

23 A Route number 1946 has 61 foot routes in total,
24 according to the CRMF.

25 Q I don't believe you mean it quite that way. It is

1 not route 1941 had 61 --

2 A Oh, I am sorry. Thank you. It is zip. Zip 10019
3 has 61 routes, yes.

4 Q 61 foot routes?

5 A Foot routes, exactly.

6 Q Okay. So a single zip code in New York City has
7 61 foot routes. Is that a large number?

8 A It is not extraordinarily large for a downtown
9 area of a big city.

10 Q Ah, yes. Would it be fair to say that zip codes
11 in urban areas, for example, on average, would tend to have
12 more routes than zip codes in less urban areas, just as a
13 generalization?

14 A As a very gross generalization, yes.

15 Q Okay. Now then, I want to focus on two columns
16 here, the FOOT column that we just talked about that shows
17 61 for that one route, and then further on over there is one
18 called FOOT SAM. FOOT SAM means the number of routes that
19 were actually sampled in that zip code, is that correct?

20 A Correct.

21 Q So there was, obviously, in this first route,
22 there was one zip code -- one route sampled and there were
23 61 total foot routes in that zip code?

24 A Yes.

25 Q And that is what you used for your weighting

1 factor to weight the total tallies, is that correct?

2 A It is.

3 Q And, for example, further on down that page,
4 you'll see under the Foot column, a bunch of routes in zip
5 code 94122 that have 48 foot routes and 15 were sampled; is
6 that correct?

7 A Yes.

8 Q Okay. Now, let's turn to the third page of that
9 exhibit.

10 [Pause.]

11 This third page is really the final results of
12 your various calculations up to this point in terms of
13 trying to develop weighted load time tallies as a proportion
14 of total tallies; is that correct?

15 A Yes.

16 Q Okay. For that very first zip code, which had 32
17 load tallies, after your inflation factor, that number
18 becomes 1,952 weighted tallies; does it not?

19 A Yes.

20 Q And following through down to the sum of weighted
21 tallies, the grand total of all tallies for all activities,
22 not just load, was 4,027; is that correct?

23 A Correct.

24 Q So that means -- that is where the 49.35 percent
25 load time proportion comes from; is that correct?

1 It's the ratio of those two?

2 A It's the ratio of --

3 Q Excuse me, I'm sorry.

4 A It's the ratio of that 4,027 to the comparable sum
5 for total tallies, which is 8,160.

6 Q Right. You're absolutely correct. I meant to say
7 that. It's the weighted total tally divided into the
8 weighted load time tallies; correct?

9 A It's the weighted --

10 Q Let me rephrase it here. The 49.35 percent
11 portion of load on foot routes is the sum of your weighted
12 load time tallies, 4,027, divided by the sum of total
13 weighted tallies, 8,160?

14 A Yes.

15 Q Now, the weighted load time tallies for this one
16 foot route observed one day in New York City, doesn't that
17 account for 49 percent of the total weighted tallies that
18 you have used to assign foots nationwide?

19 A How do you get 49 percent? What divided by what?

20 Q You show weighted tallies for this one foot route
21 in New York City, observed one day, of 1,952 weighted
22 tallies.

23 A Correct.

24 Q You show total weighted tallies for all routes
25 that were observed of 4,027. Now if you take 1,952 and you

1 divide it by 4,027, don't you come up with a pretty big
2 number?

3 A Okay, yes, about 50 percent.

4 Q About 50 percent comes from this one-day
5 observation in one foot route in downtown New York City.

6 Now, on that same page, I'd like you to look
7 further down at your standard errors and upper and lower 95
8 percent confidence intervals.

9 I just want to understand what they mean. The
10 average load time that you get here is the 49.35 percent
11 that just came from these calculations that we talked about,
12 correct?

13 A Yes.

14 Q The 95 percent upper and lower bounds, those are
15 expressed there in decimal points, but those are really the
16 upper and lower bounds of the percentage load time, in other
17 words, the upper bound is 71 percent load time.

18 A Yes.

19 Q The lower bound is 27 percent load time?

20 A Right.

21 Q So the 95 confidence interval covers a very, very
22 wide range; does it not?

23 A It does, it does.

24 Q Do you know what there is in the data that
25 contributes most to that wide, that high standard error and

1 the wide range?

2 A Well --

3 Q Is there a particular observation that
4 contributes, in particular, to that wide range?

5 A It is, indeed, the New York City observation.

6 Q So it's the New York City observation that causes
7 that wide variation?

8 A It's -- it has a large influence, yes. Another
9 problem is 36 datapoints. We would like to have more, but
10 that's what we have.

11 Q I would like to show you a slight variation on
12 what you have seen here in this document that we've been
13 talking about.

14 MR. McLAUGHLIN: Let me call this ADVO-XE-T-12-2.
15 [Exhibit Number ADVO-XE-T-12-2 was
16 marked for identification.]

17 BY MR. McLAUGHLIN:

18 Q Let me explain to you what this is: This is the
19 same as the third sheet that we had been discussing
20 previously, with one exception.

21 You'll see in that first line that shows zip code
22 10019, you may see some faint strike-through lines.

23 A Yes, I see them.

24 Q Those strike-through lines are not actually in the
25 cells; those are just graphics that have been put in there.

1 But what I have done is, down in the rows down
2 below -- let me get my right page here -- in the row called
3 Sum of Weighted Tallies, and the row called Sum of Squared
4 Errors, I have simply modified the equations in those cells
5 to have the exclude that first cell for that one zip code.

6 So, basically it's just as though you recalculated
7 this, eliminating that one zip code.

8 Now, I'm not asking you to agree whether or not
9 that is good statistical practice. The exercise is really
10 just to try to get some flavor of what the impact of that
11 very first single New York City downtown walking foot loop
12 is.

13 Now, when you delete that one tally, the sum of
14 the weighted tallies drops from 4,027 down to 2,075, and, in
15 fact, that's just 4,027, minus the 1,952 that you showed in
16 the earlier one; is that correct?

17 A Four thousand twenty-seven, point zero six, minus
18 11,952 equals 2,075.6.

19 Q Yes.

20 A Okay.

21 Q And likewise, under the weighted total tallies,
22 it's the same example there as well.

23 And when you do that, and omit just that one
24 single route, the average weighted load time tally as a
25 percentage of total tallies drops from 49.3 percent to 34.8

1 percent; do you see that?

2 A Right.

3 Q I know you haven't done these calculations, but
4 just -- does that surprise you at all?

5 A No. We've actually done similar calculations.

6 Q Okay.

7 A What we did was, we left the data for this
8 downtown New York City route in, but we did not weight it in
9 the particular experiment that I refer to.

10 Q And did you come out with a number that is not
11 much different from the 34.8 percent that's shown here?
12 Obviously it would not be the same, but it would not be
13 terribly different; would it?

14 A If you give me a second, I'll look.

15 [Pause.]

16 Okay, what we did, as I said, we left this record
17 in the analysis. But we did not weight any of the tallies.
18 We did not weight this record's tallies or any of the other
19 for the other 35.

20 And that, of course, greatly reduced the influence
21 of this route, because it had a huge weight. It has a huge
22 weight under the weighting scheme, and our result was that
23 the load time percentage fell to 38.86 percent.

24 Q Okay, so you're talking about 38.86, in that way
25 where you don't do any weighting of any tallies?

1 A Right, it now only gets a weight of one, as do all
2 the tallies for all 36 records.

3 Q Now, you will notice on this spreadsheet that I
4 have given you, the confidence intervals, the upper and
5 lower 95-percent confidence intervals, if you omit that one
6 single route, narrow very considerably; don't they?

7 A Yes.

8 Q And instead of the load time confidence interval
9 ranging from 27 percent to 71 percent, it ranges from 29
10 percent to 41 percent; is that correct?

11 A 28.95 to 40.63, assuming that these were
12 calculated correctly.

13 Q Well, I usually don't ask this question, but I
14 take it that you were -- the fact that you did some various
15 other runs there, you were, in fact, somewhat troubled by
16 the fact that a single walking foot route in downtown New
17 York City counts for 50 percent of your total weighted
18 tallies because of the fact that you have used a 61
19 inflation factor for that route; is that correct?

20 A Yes.

21 Q Okay.

22 MR. McLAUGHLIN: I don't think I'll do any more
23 with that one, Mr. Chairman.

24 Mr. Chairman, I'm not asking that that second Advo
25 Cross Examination Exhibit be admitted into evidence. It's

1 really there just as -- and I wasn't asking the witness to
2 confirm that that's the correct way to do it. It's simply
3 there to show the influence of the particular route that we
4 were talking about.

5 BY MR. McLAUGHLIN:

6 Q I do have a couple of questions for you concerning
7 some aspects of what is considered load time and what is not
8 considered load time and their STS definitions or in terms
9 of what would logically flow.

10 Are you familiar with the term "hardship
11 activity," what a hardship is?

12 A Vaguely.

13 Q Okay. That's basically where someone perhaps has
14 a sick relative and they want to have the postal carriers
15 check up on that relative to see how they are doing, for
16 example. You don't know?

17 A If you say so. I have never talked with Mr.
18 Raymond about that particular --

19 Q Well, let's assume that carriers do perform that
20 service. That's basically a public service that they are
21 performing in that case, is that right?

22 A Yes.

23 Q And in terms of the time that they spend doing
24 that activity, that is not related to any particular piece
25 of mail, is it?

1 A The way you put it makes it seem like it is not
2 related to anything, to any part of their normal working
3 day. It has nothing to do with their carrier activities in
4 general -- the way you put it.

5 Q It's different than an accountable. If the postal
6 carrier has an accountable he has to go to the door to
7 deliver the accountable and he is there because he has to
8 deliver the accountable and the activity is related to that
9 mail piece, is that correct?

10 A Yes, that is part of the normal operations of the
11 carrier.

12 Q Right. Why should hardship activities be
13 considered load time activities as opposed to they don't
14 vary with mail volume delivered at the house, do they?

15 A You would really have to ask Mr. Raymond that.

16 Q Well, I don't believe Mr. Raymond is the costing
17 witness. I am asking you about how should certain
18 activities be treated for postal costing purposes, and I
19 don't believe that's Mr. Raymond's province.

20 MR. COOPER: I believe the witness has already
21 stated he doesn't understand really what a hardship activity
22 is. If you want to continue along a hypothetical line with
23 your definition, I have no objection.

24 BY MR. McLAUGHLIN:

25 Q Well, the time that is associated with a postal

1 carrier perhaps checking up on someone that is recorded as a
2 hardship activity, that activity doesn't vary with the
3 amount of mail that is going to a house, does it? It is not
4 volume variable, is it?

5 A You are talking about where -- are you talking
6 about an activity where this is the only reason the carrier
7 has gone to the house, to do this?

8 Q Well, I think in many cases we'll find that there
9 is no way of knowing except that the activity being observed
10 was called hardship.

11 A Well, you would have to ask Mr. Raymond, but I
12 would want to know if --

13 Q Well, let's take it both ways --

14 A -- if the postal activity was done jointly with
15 the delivery of mail.

16 Q Let's take it both ways. One example -- the only
17 reason the carrier goes to the door -- there is no mail to
18 deliver. He just goes to the door to check up on this
19 person because he has been asked to check up on them. That
20 obviously has nothing to do with mail volume, does it?

21 A Not the way you put it.

22 Q Okay. So that should not be attributed as load
23 time, should it?

24 A The question is all of the activities have some
25 volume variability, so if your criterion is not to assign it

1 to a particular activity because that activity has some
2 volume variability, then it is not clear what you are going
3 to be doing.

4 Q Well, that activity does not vary with the volume
5 that is delivered to the house in that case, does it?

6 A According to the strict terms which you have used
7 to describe this activity I would have to agree.

8 Q Now let's take the other example. The carrier
9 does have a piece of mail to deliver to that house, but he
10 has also been asked to check up on the person. Obviously
11 just delivering the mail to the house might just take a few
12 seconds of load time, but he has to knock on the door, wait
13 for the person to come, ask him a few questions, maybe chat
14 a little bit, and then say "Good to see you -- good to see
15 you are well. Goodbye."

16 The activity that is observed is related not to
17 the total volume of mail that is received but it is related
18 to the fact that he had to make an access at all, is that
19 correct? Is it coverage-related, isn't it?

20 A The reason I am hesitating is because the amount
21 of time it takes could be affected by how much mail the
22 carrier has if these different activities are being
23 conducted jointly.

24 Q Well, but we are talking now about sample
25 observations where there is really no way to determine

1 whether there was any mail delivered, one piece or 100
2 pieces.

3 The question is why is that treated as load time
4 activity as opposed to something that is not 100 percent --
5 we shouldn't say 100 percent volume variable -- that is not
6 considered, for example, coverage-related or even more
7 broadly an institutional cost of the Postal Service.

8 A The primary reason is that this is time -- this is
9 time for an activity that is being conducted after the
10 carrier has physically reached a stop. That is a key part
11 of the definition of load time.

12 There is no coverage-related street time activity
13 that one could allocate such an observation, so that is
14 simply not an option.

15 Q It could be allocated to foot access?

16 A It violates the key distinction between the foot
17 access and the load activity, which is the load activity
18 encompasses everything done after the carrier has reached
19 the delivery point, the stop. And what you have described
20 clearly comes under that definition of activity conducted
21 after the carrier has physically reached the stop.

22 Q Even if there is no mail to deliver?

23 A Yes, even in this case, because, you know, one of
24 the key components of the load time definition is that it is
25 -- is that load time is time that occurs, it is the time for

1 the carrier activities that are conducted after the carrier
2 reaches the stop. And that is the key distinction between
3 the loading activity and the walking, the route access
4 activity which encompasses the activity prior to reaching
5 the stop and the activity of leaving the stop.

6 Q Let me go to a different subject. I had thought I
7 had brought it with me, but apparently I have left behind at
8 the office a document. I hope it is the only one I have
9 left behind. It related to a spreadsheet that you have
10 called, the caption of it was "ESCMF.Excel-S," which was a
11 spreadsheet showing the number of routes by route type for
12 each zip code that Mr. Raymond gave you. Do you recall that
13 spreadsheet?

14 A Can you tell me which Library Reference that is?

15 Q Well, I just discovered -- I think that it was on
16 the page that I left at the office, so I don't have that
17 with me at the moment.

18 A What is the name of it again?

19 Q The spreadsheet is captioned "ESCMF.Excel-S". I
20 believe that is based on the master file, the carrier route
21 master file information.

22 A Let's see if it is this one. Is it one of the
23 ones you mentioned yesterday?

24 Q Yes. Yes, it is.

25 CHAIRMAN GLEIMAN: I think that while you all

1 scurry around and try and figure out where it is from, we
2 are going to take a ten minute break.

3 THE WITNESS: Okay.

4 CHAIRMAN GLEIMAN: I hope you figure out where it
5 is from fast so that you can enjoy the break, too.

6 [Recess.]

7 CHAIRMAN GLEIMAN: It appears as though all the
8 key players are back in place now. So, Mr. McLaughlin, you
9 can proceed when you are ready.

10 MR. McLAUGHLIN: Okay. Well, Mr. Chairman, and
11 Mr. Baron, the spreadsheet I was referring to was in the
12 response to -- it was included in Library Reference 290.
13 The spreadsheet name is "ESCMF.Excel-S".

14 BY MR. McLAUGHLIN:

15 Q Are you familiar with that?

16 A Yes.

17 Q Okay. And just so we understand what that is,
18 since I don't have my copy here to give to the Commissioners
19 so that they can see along with me, that lists every zip
20 code that is included in Mr. Raymond's database. Excuse me,
21 let me refine that. It includes every database that is in
22 Library Reference 163, is that correct -- every zip code in
23 Library Reference 163?

24 A This has 76 zip codes.

25 Q Okay.

1 A Is that the --

2 Q Okay. And for each zip code, it shows the number
3 of routes by route type. And although I don't have it in
4 front of me, as I recall, somewhere not too far down that
5 list is the zip code in New York City we were talking about,
6 and it shows, for example, 61 foot routes for that zip code,
7 is that correct?

8 A I don't recall the --

9 Q Oh, you don't have that spreadsheet with you?

10 A I don't have it printed out, it is on --

11 Q Okay. Well, the spreadsheet had columns for each
12 of the route types, but it did not have a total column
13 indicating total zip codes per route, is that correct?

14 A You mean total routes per zip?

15 Q Excuse me. Total routes per zip, yes, you are
16 correct. It did not have that information?

17 A No. No, it didn't have that totals columns.

18 Q Well, unfortunately, since I don't have it with
19 me, I can't show you my calculation. But I did do a
20 spreadsheet where I put in a total column that totaled up
21 the number of routes for each zip code, and then a grand
22 total, and then I divided that by the 76 total zip codes,
23 and I came out that the routes, the zip codes in the
24 database have an average of 25.6 routes per zip code. Does
25 that sound about in line with what you would expect?

1 A Honestly, I don't know. I would have to do the
2 calculation myself.

3 Q Okay. Okay. Let's assume that the average number
4 of routes per zip code in the Library Reference 163 database
5 is 25.6 routes per zip code, okay. That I did the math
6 correctly.

7 A Okay.

8 Q Do you have any idea how that compares with the
9 Postal Service system of delivery routes, city delivery
10 routes, in terms of routes per zip code?

11 A If 25 is correct, and I would have to take a look
12 myself, that does seem on the high side.

13 Q It does seem on the high side. Can you turn to
14 your response to MPA Number 6?

15 A Okay.

16 Q And let's start with page 8 of MPA Number 6.

17 A I'm sorry, page 8?

18 Q Page 8.

19 A Okay.

20 Q Do you have that?

21 A MPA-6, page 8, yes.

22 Q Right.

23 Do you have that now?

24 A Yes, I do.

25 Q You see there's a table at the top of the page

1 that's captioned Number of Five-

2 Digit Zip Codes With City Routes By Area; do you see that?

3 A Yes.

4 Q And the total number that's shown there is 11,507.

5 A Okay.

6 Q And that is the total number in the Postal system
7 of zip codes that are served by city delivery carriers; is
8 that correct?

9 A In 1997 Postal Quarter Four.

10 Q Right.

11 A Yes.

12 Q Now would you turn to page 9 of that same response
13 to MPA Number 6?

14 A I've got it.

15 Q And this is a table called Number of City Routes
16 by Area and Delivery Mode. Down at the bottom, it has a
17 total of 166,107; do you see that figure?

18 A Yes, I do.

19 Q Is that the total number of city delivery carrier
20 routes?

21 A In '97, Quarter Four, yes.

22 Q Okay. So, if I wanted to calculate for the Postal
23 system at that time, what the average number of routes per
24 zip code was systemwide, would I take the 166,107 and divide
25 that by the 11,507?

1 A Yes.

2 Q And if I did that calculation, would you -- which
3 is a fairly simple calculation -- would you accept that the
4 average number of city delivery routes per zip code in the
5 Postal Service system is 14.4 routes per zip code?

6 A Assuming your math is correct.

7 Q Well --

8 A You're dividing 166,107 by --

9 Q Please check it if you want.

10 A By 11,507.

11 Q Well, just eye-balling it, does it look like it's
12 --

13 A Sure.

14 Q It's not 25; is it?

15 A No.

16 Q It's closer to 14?

17 A Sure.

18 Q Okay. So, at least in terms of routes per zip
19 code on an average basis, the zip codes sampled in LR-163
20 are substantially larger than the zip codes in the system;
21 is that correct, on average?

22 A Well, I want to check the 25.

23 Q Okay, well, I'll tell you what --

24 A If it is 25, then obviously 25 is bigger than 14.

25 Q You understood exactly how I calculated that in

1 terms of that spreadsheet; is that correct?

2 A Sure.

3 Q It would be very simple for you, not perhaps here,
4 but back at the office, to simply do a total column and
5 divide it by 76 to confirm that number?

6 A Yes, it would.

7 MR. McLAUGHLIN: Mr. Chairman, I don't want to
8 leave things in limbo here. We had the witness saying,
9 well, it might be right, it might not be right. I would --
10 I feel confident in my number, but I don't want to have any
11 uncertainty.

12 I know that we can't just check right now, but I
13 would ask the witness to check that figure, and that if it
14 turns out that he has any problem whatsoever with my
15 calculation, we'd like to know about that.

16 CHAIRMAN GLEIMAN: Mr. Baron, can we take care of
17 that?

18 THE WITNESS: Sure.

19 CHAIRMAN GLEIMAN: And if there's a problem,
20 you'll get back within seven days and let us all know.
21 Thank you, Mr. Baron, Mr. Cooper.

22 BY MR. McLAUGHLIN:

23 Q Now, with a system -- you don't have any doubt
24 about the 14.4 route average, systemwide for this period
25 covered in MPA Number 6; do you? That comes straight off of

1 your response.

2 A Sure.

3 Q Okay. Now, 14.4 as an average means that there
4 are obviously a lot of routes with less than 14.4.

5 Are you aware of situations where there are routes
6 with three, four, five or six city routes -- excuse me, let
7 me clarify that:

8 Are you aware that there are zip codes with maybe
9 only two, three, four, or five or six city delivery routes,
10 but which also have a number of rural routes operating out
11 of that same zip code?

12 You may have three city routes and 12 rural
13 routes?

14 A Sure.

15 Q Okay. Does that contribute to the 14.4 routes per
16 zip code average?

17 A Not the rural routes. These are --

18 Q No, no, the rural routes don't, but the fact that
19 you have only three or four city routes in that zip code
20 does contribute?

21 A If I understand what you're asking, it's that the
22 reason certain zip codes only have three city routes is
23 because they also have rural routes?

24 Q Yes, that's one reason; isn't it?

25 A I would say yes.

1 Q Yes. And, in fact, in a zip code that has 91 foot
2 routes -- excuse me, 61 foot routes, you wouldn't expect to
3 see many rural routes; would you?

4 A No.

5 Q No.

6 A I don't think so.

7 Q Do you think there's any possible correlation
8 between the average number of city delivery routes per zip
9 code and either the urbanization or ruralization of the area
10 being served by those zip codes?

11 I'm not asking you if you've done any analysis;
12 just is it possible that there might be some correlation?

13 A It's possible, but you have to be very cautious
14 because of how you defined -- it's very tricky in terms of
15 how you define rural, suburban, city.

16 Q Well, let's just put it this way: You didn't do
17 any analysis to determine whether the zip codes included in
18 here were the same characteristics in terms of routes per
19 zip code as the system averaged, did you?

20 A I did look at the distribution of possible
21 deliveries across delivery type categories in Mr. Raymond's
22 sample, and compared that distribution with the comparable
23 distribution for the entire population, and found that the
24 two distributions were fairly close.

25 Q Well, but that wasn't quite my question; was it?

1 You didn't do the comparison I asked you about?

2 A In terms of the distribution of routes across
3 route types?

4 Q Yes.

5 A Or in terms of --

6 Q Well, number of routes per zip?

7 A No, because I don't really see the relevance of
8 any of that to the calculation of the street time
9 percentages.

10 I think the burden is on the person who believes
11 that is relevant, to show how it's relevant. And I -- you
12 know, I'm willing to look at such evidence. I haven't seen
13 any evidence that it's relevant.

14 That's why I have not done it.

15 Q So you weren't at all troubled by the fact that
16 the zip codes that were surveyed had a, subject to check,
17 substantially larger number of routes per zip code than the
18 system average?

19 A No, I am more concerned about the distribution of
20 delivery points across delivery type categories. That is
21 where I think the -- I think that is the relevant issue that
22 should be focused upon for purposes of comparing the sample
23 with the population.

24 Q You don't think that there are potential
25 differences in the makeups of areas such as, for example,

1 differences in characteristics of urban areas that have high
2 density versus those that may be smaller towns, in terms of
3 possible load percentages?

4 A I can't absolutely exclude that possibility but I
5 would need to see something more than speculation on that.

6 Q Well, you haven't looked at it though, have you?

7 A No.

8 Q Okay.

9 A Because I don't see the connection to be
10 sufficient to justify the presumption that there is, so I
11 would really need to see some evidence first and then make
12 up my mind --

13 Q Okay.

14 A -- that this is at all relevant.

15 MR. McLAUGHLIN: Mr. Chairman, I've got some
16 information I would like to request. I am not quite sure
17 whether it should be coming from this witness or perhaps
18 Witness Raymond. Perhaps I should just make it to the
19 Postal Service and let them figure out who has the best
20 information.

21 CHAIRMAN GLEIMAN: Well, you have got the witness
22 up there, so I would ask him if he can provide it, and then
23 if he can't I am sure that Mr. Cooper and Mr. Hollies &
24 Company will find somebody who can -- maybe.

25 BY MR. McLAUGHLIN:

1 Q For the routes that are shown in the database,
2 LR-163 database, for those zip codes, we'd like to get the
3 number of city delivery carrier delivery units that are in
4 each zip code. Do you follow that?

5 A Not quite. You mentioned four?

6 Q For each zip code --

7 A Okay, I'm sorry.

8 Q For each zip code the number of city delivery
9 carrier units, delivery units, that are in that zip code.

10 A Okay -- well, I don't have that information. I
11 don't know who should get it.

12 MR. McLAUGHLIN: Okay.

13 CHAIRMAN GLEIMAN: Mr. Cooper, would you see if
14 that information is available from the Postal Service?

15 MR. COOPER: Yes, sir, just as long as this isn't
16 added to the list of outstanding Raymond interrogatories I
17 would be happy to proceed --

18 MR. McLAUGHLIN: Well, what I might suggest, Mr.
19 Chairman, is that I would be willing to consult with counsel
20 to see if we can't figure out the easiest way of
21 accomplishing that. I know you like to have things very
22 formalized, and normally I do too, but let me just try to
23 work that out.

24 Obviously we want to minimize --

25 CHAIRMAN GLEIMAN: Certainly. I don't object to

1 informal reconciliation of matters. I prefer that to a lot
2 of motion practice. I just want to make sure that when we
3 get downstream something isn't missing, a piece of the
4 puzzle isn't missing that someone, whether it is ADVO or
5 another Intervenor, finds necessary for their purposes.

6 MR. McLAUGHLIN: Mr. Chairman, I could go on, but
7 I will not. That is all I have.

8 CHAIRMAN GLEIMAN: Next then is the Newspaper
9 Association of America.

10 CROSS EXAMINATION

11 BY MR. BAKER:

12 Q Good morning, Mr. Baron.

13 A Good morning.

14 Q I am Bill Baker, representing the Newspaper
15 Association of America. I only have a few questions that I
16 want to ask you about.

17 Could you begin by turning to the table at the top
18 of page 18 of your testimony?

19 A Okay, I'm there.

20 Q All right. Could you summarize what the right
21 column that begins with the words "Percentage deviation"
22 indicates?

23 A It indicates the deviation of the average of all
24 the predicted load times from the single load time that is
25 predicted at the average volume stop -- at the stop that

1 receives the average CCS pieces per stop.

2 Q Now in the line for single delivery residential,
3 the percentage deviation is a minus 2.61, correct?

4 A Yes.

5 Q And is that the same 2.61 percent discrepancy that
6 you refer to at page 17, line 13 through 15 of your
7 testimony?

8 A Yes.

9 Q And there you note that if the discrepancy is
10 inflated, it would correspond to a \$21 million discrepancy?

11 A Correct.

12 Q Did you anywhere quantify the discrepancies in
13 dollar terms for the MDR and BAM lines?

14 A No, I did not quantify those discrepancies in
15 dollar terms because I thought the discrepancies were so
16 large that it really wasn't necessary to do so in order to
17 make my point, but I would be happy to do so.

18 Q Yes, if you could. You expect them to be greater,
19 well over \$21 million?

20 A Definitely.

21 MR. BAKER: I request that the witness do that.

22 CHAIRMAN GLEIMAN: Seven day rule.

23 MR. COOPER: Yes, sir.

24 CHAIRMAN GLEIMAN: Thank you.

25 BY MR. BAKER:

1 Q Mr. Baron, could you now turn to page 21? At line
2 8 you present what I believe you call Equation 10, which is
3 an equation for elasticity of load time which you present as
4 the sum of two distinct effects, correct?

5 A Line 8 is Equation 11.

6 Q Ah -- excuse me.

7 A But correct, subject to that --

8 Q And those two effects are an elemental effect and
9 a deliveries effect?

10 A Yes.

11 Q My question concerns the deliveries effect.
12 Further down that page, lines 14 through 17, you state that
13 "The deliveries effect must be separately accounted for to
14 correctly account for the increase in load time that results
15 from new actual deliveries caused by volume growth."

16 A Correct.

17 Q Does the second effect include what you would call
18 the stop effect?

19 A No, it is similar to the stops effect. The stops
20 effect is the additional time that results because a carrier
21 goes to a new stop on a route.

22 The deliveries effect is very comparable. It is
23 the additional time that results because the carrier is
24 going to a new delivery at a single multiple delivery stop,
25 either MDR or BAM.

1 Q Does Equation 11 account for the stop effect
2 arising from new actual deliveries caused by volume growth?

3 A Equation 11 only accounts for the deliveries
4 effect, the effect of going to a new delivery point at a
5 single MDR or BAM stop.

6 Q Now, at the beginning of your -- changing to a
7 different subject today -- at the beginning of your cross
8 examination, counsel for Advo asked you about the -- some
9 information you received from Witness Raymond.

10 And, in particular, he asked you for how many -- I
11 believe he said route days there were and that you used in
12 your testimony.

13 Do you remember that exchange?

14 A Somewhat, yes.

15 Q Okay. and in particular, I believe counsel asked
16 you how many route days were reflected in the data that you
17 used, and I believe you answered 844. Do you remember that?

18 A I believe my answer was that the dataset that I
19 was given has 861, but that I did not use all 861.

20 But that in any event, it's not particularly
21 relevant to what I did because I aggregated over all the
22 route days for each route to calculate a single set of mean
23 tallies per route for 340 or 336 routes, actually, in my
24 case.

25 Q The reason I'm inquiring is that for once I find

1 myself in agreement with counsel for Advo, which I thought
2 you had used 861.

3 In the dataset provided to you by Witness Raymond,
4 do you recall if there were approximately 844 or maybe 845
5 identified route days in that data set?

6 A I recall that there were 861 route days in the
7 dataset that I was given and that I used to calculate street
8 time percentages.

9 Now, we would be happy to calculate street time
10 percentages, I think, on 844. It's not going to make any
11 difference.

12 Q Okay.

13 A If we really want to pursue this, the difference
14 in the street time percentages will be trivial, less than
15 trivial.

16 Q Now, when you -- did it matter to you all -- did
17 you -- let me -- we -- let me back up and ask this question
18 in a more articulate fashion.

19 When you did your analysis, did you ever concern
20 yourself with whether the data entry you were using was
21 associated with a particular date or was undated?

22 A I did look at the dates to make sure that they
23 were coming from the entire year, from the entire 12 months
24 of the year, and satisfied myself that that is, indeed, the
25 case.

1 Q Do you happen to have Witness Raymond's answers to
2 Advo Interrogatories 65 and 66 to him?

3 A No, I don't.

4 Q Well, in there they asked Witness Raymond to
5 confirm that there were or appeared to be 861 route days in
6 Library Reference 163 that consisted of 845 route days with
7 dates, plus 16 sets of undated tallies.

8 And further in the answer to Advo-66, Subpart (c),
9 they actually then provided, I think, dates for the 16
10 undated tallies.

11 Are you familiar with this difference between the
12 845 route days with dates and 16 routes days that did not
13 have dates?

14 A Here's what I do know: I did notice that a number
15 of routes didn't have route days; they had 1-1-00. I didn't
16 think it was particularly relevant, so we used all the data.
17 We did not exclude data because it didn't have a route day
18 in the calculation of the official street time percentages.

19 I know I did an experiment where I said, well,
20 what if we take them out? It doesn't make any difference.
21 I mean, I'd be happy to show that.

22 It makes zero difference in terms of what we're
23 all interested in.

24 Q I think what you said is that you actually did use
25 the 861?

1 A As I recall, I used all 861, with one important
2 exception. Remember that in my analysis, in order to do the
3 inflation, in order to calculate the inflation factors, I
4 needed to know how many population routes exist by route
5 type in each zip code.

6 And we could not get that information for four
7 routes, so, again, I did it at the route level, so I only
8 had 336 routes in my analysis, and I'm sure that that
9 corresponds to 857, because all four of those routes had
10 only one route day of data.

11 So, I used 857 when I did the analysis that
12 applied the weights.

13 Q All right, okay. I want to shift to one other
14 point: Counsel for Advo asked you a number of questions and
15 showed you some exhibits focusing on your inclusion of one
16 foot route in New York City in your calculation of load time
17 percentages for foot routes.

18 Do you remember that?

19 A Yes.

20 Q During that cross examination, you mentioned that
21 you had done a calculation of foot time in which you had not
22 weighted the New York City route; is that correct?

23 A Correct.

24 Q Now, at what point in your -- well, did you do
25 that calculation before or after you filed your testimony?

1 A Honestly, I don't remember. I may have done it
2 both. I may have looked at it again after.

3 Q Are you confident you looked at it before?

4 A No, I'm not confident as to the exact time.

5 Q But your recollection is that it was about January
6 or so?

7 A I just don't remember the timing of these
8 different calculations.

9 Q Okay. But nonetheless, you did leave that tally
10 in your testimony as a weighted tally?

11 A Yes.

12 Q Why?

13 A Our biggest concern in deciding whether to weight
14 it or not was that all of the routes in the particular zip
15 code that was sampled be accurately represented in the
16 analysis.

17 We noticed that certain zip codes, especially for
18 certain route categories, had a very high percentage of
19 relatively -- I should say relatively high percentage of the
20 total population routes in the particular zip code.

21 Whereas in other cases, the sample only had one of
22 very many routes in the population. So, for example, in the
23 case of New York, we thought it would be more accurate to
24 view that one route that we did get data for as representing
25 the entire array of approximately 66, I believe it was -- 66.

1 foot routes.

2 Especially in this particular case, we would
3 expect the results for all 66 foot routes, in terms of the
4 street route percentages, to be very similar. In other
5 words, a high load time percentage for that one observed
6 route is to be expected for that type of foot route.

7 So we thought it would be the appropriate thing to
8 do to assign that weight to the tallies for that midtown New
9 York City route, because it really is truly representing all
10 of the routes in its particular zip code, 10019.

11 Q Radio City Music Hall Station, that's in the heart
12 of midtown Manhattan?

13 A That's my understanding, yes.

14 Q Do you have a sense of whether the delivery points
15 served by that route are likely to be office buildings or
16 high-rise buildings?

17 A Yes.

18 Q Okay.

19 MR. BAKER: Mr. Chairman, I have no more
20 questions.

21 CHAIRMAN GLEIMAN: Office of Consumer Advocate?

22 MR. COSTICH: Thank you, Mr. Chairman.

23 CROSS-EXAMINATION

24 BY MR. COSTICH:

25 Q Good morning, Mr. Baron.

1 A Good morning

2 Q I would like to ask you a few questions about the
3 stops effect.

4 A Okay.

5 Q Could you look at page 6 of your testimony, line
6 16 through 19?

7 A Okay.

8 Q I am particularly interested in what you describe
9 as new justification for the Postal Service's fixed time at
10 stops measure. Could you just summarize what that new
11 justification is?

12 A The Postal Service measure of the stops effect is
13 an activity measurement. It is a measurement that you can
14 at least make sense of in terms of envisioning what a
15 carrier is doing. The big concern I have about the
16 alternative residual measure of the stops effect is that
17 nobody has ever been able to tell me what the carrier is
18 doing that distinguishes that block of time, that accrued
19 coverage related load time hours. What is the activity that
20 distinguishes it from the elemental load activity?

21 I think that is important because everyone
22 involved in this functional city carrier analysis I think
23 agrees that we need to understand the activities the
24 carriers are doing in generating all of these hours for
25 which we have the different accrued cost pools. And even

1 though my concept of a stops effect is difficult to measure,
2 and we are showing it to be a very small amount of time,
3 around a second, at least I am able to conceptualize, in a
4 very straightforward way, what the carrier is doing in the
5 block of time that I call stops effect time.

6 I have never been able to get a straight answer to
7 the question of what the carrier is doing during this huge
8 block of time that is called accrued coverage related load
9 time equal to the residual of the initial accrued load time
10 minus elemental load time. It makes no sense from a
11 functional point of view, it makes no sense from an activity
12 based costing point of view, none whatsoever.

13 One answer that we got in the last case as to what
14 it is is that it is economies of scope. You don't do
15 economies of scope. It is not an activity. My definition
16 of the stops effect is an activity. It is a short amount of
17 time that the carrier spends immediately after reaching a
18 delivery point, just to get ready to do the handling of mail
19 or mail-related equipment, or perhaps getting ready to do a
20 special service function. So that is the key new advantage
21 that I saw that I hadn't discussed in previous analyses.

22 Q You said that the other concept of coverage
23 related load is that it is a residual, is that --

24 A That is how it is calculated mathematically.

25 Q And that is the result of having a total amount of

1 load time and that is measured by what means?

2 A In this particular analysis, you start with the
3 total load time determined by the load time straight time
4 percentage, and then, yeah, that is the starting point.

5 Q And then you calculate or estimate elemental load,
6 is that correct?

7 A Elemental load is defined as the aggregate of the
8 volume variability of load time at one stop with respect to
9 all the different volumes loaded at that stop. It could be
10 viewed as, you know, that elasticity of the elasticity times
11 this initial accrued cost pool. If you view it as the
12 elasticity of load time, or the aggregate elasticity of load
13 time with respect to all the different volumes, times this
14 initial cost that we just mentioned, then you could refer to
15 the result as elemental load time cost. And when you
16 subtract that from the initial total again, you get what has
17 traditionally been referred to as a residual or accrued
18 coverage related load time cost, and that is the dollar
19 amount, or if you convert it into an hour amount, that I
20 have trouble with. I think we have all had trouble with in
21 terms of envisioning it as an activity.

22 I mean what is distinct in terms of what a carrier
23 is doing in the coverage related load time block of time or
24 cost versus the elemental load time block of hours or costs?

25 Q Well, can't you answer that question by just going

1 back and asking how was that percentage of load time
2 initially determined?

3 A That would tell you what the load time activity is
4 as a whole, but it doesn't distinguish the elemental load
5 time activity from the coverage load time activity in terms
6 of in an activity sense.

7 Q Well, when the data collector is attempting to
8 measure load time, is there an instruction that the data
9 collector has for distinguishing load time from some other
10 activity on the route?

11 A Certainly, but there is nothing whatsoever having
12 to do with distinguishing an elemental load time activity
13 from a coverage related load time activity in any of the
14 instructions.

15 Q But in all the instructions, the data collector is
16 instructed to put down load time if he observes carrier
17 handling mail at a stop, correct?

18 A He is instructed as to the difference between load
19 time as a whole and other non-load time activities, yes.

20 Q And the way he observes load time is if the
21 carrier is handling mail at the stop?

22 A Right. The carrier has to be handling mail or
23 mail-related equipment in preparation of actually putting
24 mail into a receptacle or the carrier has to be doing that
25 action of -- taking that action of putting the mail in the

1 receptacle, or some other activity relating to dealing with
2 a customer such as getting a signature.

3 Q So whether you call it elemental load or coverage
4 related load, it is still load time, right?

5 A Yes, but if you are going to analyze elemental
6 load and coverage related load in a completely different
7 manner, there needs to be some basis for that. And if you
8 can't even distinguish the activities, if you can't even say
9 what the different activities area, I am hard-pressed to see
10 the justification for the different analytical treatment.

11 Normally, when you treat two different pools of
12 hours or costs differently, in terms of the volume
13 variability and distribution analysis, you have in mind that
14 the related difference in the activity between these two
15 blocks of time are costs. That is not the case here between
16 coverage related load time and elemental load time. It is
17 the case as far as the distinction between what I call the
18 fixed time at stop and the other load time, what I sometimes
19 call pure load time because it comes under the definition
20 that we just discussed.

21 Q Could you look at page 8 of your testimony, lines
22 16 through 20.?

23 A Yes.

24 Q You say each activity cost must be regarded as the
25 cost of a separable, explicitly defined activity, is that

1 correct?

2 A That's a basic principle of activity-based costing
3 and the functional analysis, I think.

4 If you're going to go to the trouble of splitting
5 a pool of hours into two distinct components and analyze
6 them in a completely different fashion, I think we all agree
7 you ought to know what the difference in the activity is.

8 If they're exactly the same activity, then I
9 seriously question why you'd split them up into two distinct
10 pools of hours or costs and analyze them in terms of volume
11 variability and distribution key differently.

12 It doesn't make sense from an activity-based
13 costing point of view.

14 Q Even though it's all load time?

15 A If that's your point of view, then you shouldn't
16 be distinguishing -- you shouldn't be splitting up coverage
17 load from elemental load in this fashion; you should split
18 them up in a way that at least makes sense from an
19 activity-based point of view where you can distinguish the
20 actions of the carriers the way I've attempted to do,
21 between what I call the fixed time and stop activity and the
22 later activity that actually does involve the handling of
23 mail or mail-related equipment of special service
24 provisions.

25 Q Well, let's look at your definition of the fixed

1 time at stops. I'd like to make sure if I've got it
2 straight in my own mind.

3 This is an activity that occurs at every stop?

4 A At every covered stop, yes.

5 Q And it's independent of volume for the stop?

6 A Correct.

7 Q Now, is it the same amount of time at every stop?

8 A That's the way we measure it, because of data
9 limitations. As I've said in numerous interrogatory
10 responses, we're limited by the 1985 data that we have
11 available in terms of how we measure it.

12 We're not measuring it the way we would like;
13 we're measuring it as the average of the lowest 20 percent
14 of load times observed at stops that get just one letter,
15 because that's the close proxy to no volume.

16 Q Well, conceptually, should this time be the same
17 at every stop?

18 A I think so, because if it isn't, then I don't see
19 how it differs from elemental load time. I think that the
20 elemental load time analysis already encompasses all of the
21 amount of time that varies with volume at one stop.

22 If someone argues that the elemental load time
23 concept does not fully capture the effect of increase in
24 volume on load time at one stop, I would like them to point
25 out the deficiency in the elemental load time measure that

1 prevents it from fully capturing and fully accounting for
2 the impact of increase in volume at one stop on load time at
3 one stop.

4 No one has ever done that. So why is not
5 elemental load time already picking up that effect? I think
6 it is.

7 I mean, I'd be happy to read any analysis that's
8 provided to show me why it isn't, but I've never seen such
9 an analysis, and I remain willing to look at such a proposal
10 as to what is it about elemental load time that means it's
11 not fully capturing the effect of an increase in volume at
12 one stop on load time at one stop.

13 That's certainly what its intended purpose is.

14 Q Elemental load time captures the effect of volume
15 on time spent at stops already covered; is that correct?

16 A Right. It's the effect of an increase in volume
17 on load time at the stop that's being covered.

18 In fact, if you look at the formula, it's the
19 elasticity of load time at one stop with respect to volume
20 at that one stop. You can view that as the elemental load.

21 I mean, that is the elemental load elasticity. I
22 need say no more. I mean, that's how it's defined.

23 Q Now, does that come out of your Equation 1, if
24 we're talking about single delivery residential stops?

25 A What page are you on?

1 Q Four.

2 A Page four? Yes. You can use Equation -- well,
3 you could use that one, too, but --

4 [Pause.]

5 Yes, this is the SDR equation. This is an
6 equation for load time at one stop.

7 Q And when you speak of the elasticity, what part of
8 this equation are you referring to?

9 A It would be the elasticity of LT, which is the
10 dependent variable in this equation, with respect to the
11 V-sub-K volume terms that you see in the middle part of the
12 equation toward the end, as well.

13 Q It's everything after the V-sub-J?

14 A Right, and if you want to talk about V, elemental
15 load time elasticity, you would calculate it as the sum of
16 all the individual elasticities that you get by taking the
17 elasticity of load time with respect to each individual
18 volume term.

19 In this case, we've got letters, flats, parcels,
20 accountables and collections. So we'd have five separate
21 elasticities.

22 What you can refer to as the elemental load time
23 elasticity would be the sum of those five elasticities.

24 Q And that's taking the partial derivative of LT
25 with respect to each of those five characteristics?

1 A That's part of the formula.

2 Q And the multiplying each partial derivative by the
3 ratio of -- which goes on top? I always --

4 A Volume goes on top, and the predicted load time
5 would go on the bottom.

6 Q And you'd get five terms like that, and you need
7 to add them all up?

8 A Yes.

9 Q And in this case, you come up with -- when you
10 apply that to the total accrued load time, you get something
11 less than total accrued load time?

12 A Correct, the way it's estimated. I mean, it's
13 conceivable that you could estimate it to be such that the
14 elasticities would sum to 100 percent, but the equations
15 that have been estimated, that we use, the equations that
16 were estimated by the Rate Commission in 1990, do satisfy
17 the condition you just mentioned. They sum to less than 100
18 percent in all cases.

19 Q And the residual is what is referred to as
20 coverage-related load time?

21 A Right.

22 Q Now let's look back at your conception of the
23 fixed time spent at the stops. You have defined it, I
24 believe, as time between access and load, would that be a
25 quick summary description of what you are trying to

1 estimate?

2 A That would be one way to look at it, yes.

3 It is an interval of time that we believe would
4 logically occur immediately after the stop is accessed but
5 before the actual handling of mail or mail related equipment
6 begins. It is not very long. It's only about a second is
7 how we are measuring it.

8 Q Could that time be negative?

9 A If it were negative I would say it just doesn't
10 exist. I have heard that argument being made and I am not
11 entirely unsympathetic to that argument that the amount of
12 fixed time at a stop if so low -- we are measuring it as
13 only one second, after all, that maybe it really is zero.

14 I have said this in interrogatory responses. You
15 know, if someone says wait a minute, you know, you are so
16 low that does it really exist at all? I mean that is an
17 argument. We decided no, we are measuring it at about one
18 second so that is what we are going to stick with, but that
19 is how I would answer your question.

20 Q Well, if we take my quickie definition that it is
21 the amount of time between accessing and loading, and if we
22 define load time as touching the mail at the stop, how would
23 we account for an observation where a carrier is already
24 fingering the mail as he is approaching the stop and
25 continues to finger it right up to the point where it is in

1 the receptacle?

2 A In that particular hypothetical, if he is
3 continuously fingering during the route access FAT time
4 through the loading, then there would be no fixed time stop
5 in that case because I mean in this specific hypothetical
6 you have precluded any kind of fixed time stop.

7 Q Well, isn't it actually negative if you are
8 looking for the time between accessing and loading?

9 If the accessing and loading time are overlapping,
10 isn't the difference between them negative in some sense?

11 A I don't see how they would be overlapping. At
12 some point you would say even though the person is still
13 walking he has reached the delivery point and for the
14 briefest instant in time -- you guys can see this on the
15 video sometimes -- he is loading, so I don't see that you
16 would ever be in a situation where there would be an overlap
17 where the time interval for route access FAT ends after the
18 time interval for load time begins. I don't see that that
19 would ever happen.

20 Q Well, let's think about a vehicle. There is also
21 access time on curb line routes, is that correct?

22 A Yes.

23 Q Is it conceivable that the vehicle could actually
24 never come to what the police like to call the full and
25 complete stop before the loading was actually completed?

1 A In all honesty, I would transfer that question to
2 Mr. Raymond, but hypothetically you can think of anything
3 you want. I have certainly seen videos of carriers walking
4 in such a way that it was very hard to detect if and when
5 they actually came to a stop, a physical stop.

6 Nevertheless, if they were observed actually
7 putting the mail in -- what do they call it in that case
8 --the "slam dunk box" -- I mean if that is where he was
9 tallied, that would be load time, so again I don't see how
10 you would have this overlap that you are talking about.

11 Again, as far as whether that happens in a
12 vehicle, they don't even stop the vehicle, I never discussed
13 that one with Mr. Raymond but I suppose you could at least
14 hypothesize it.

15 Q I believe you mentioned earlier that you
16 considered it important to be able to define the activity
17 that is taking place, did I understand you correctly?

18 A Yes, it is indeed the whole foundation of the
19 street time percentage analysis, among other things.

20 Q I think you received a few interrogatories asking
21 you to describe what occurs during this stops effect time.

22 Could you give that another try?

23 A We measure it to be about one second, so it is
24 just that brief instant in time after the carrier has
25 reached a stopping location while the carrier is getting

1 ready to begin the mail preparation activity -- the activity
2 of preparing mail to be put into receptacles.

3 Q Okay. When you say "preparing mail," you don't
4 mean actually handling mail, do you?

5 A I mean handling mail or mail related equipment,
6 maybe handling trays in the vehicle.

7 Q Is that something that the carrier would be doing
8 during this fixed stops effect time?

9 A He would be in the process of getting ready to do
10 the mail handling or the handling of the equipment. It is
11 only a second, so it is just --

12 Q Well, let me see if I have got this straight. The
13 carrier approaches the delivery receptacle and stops. That
14 ends the access time, is that right?

15 A Yes.

16 Q Then he waits for one second and sort of does
17 nothing that an outsider could observe, is that correct?

18 A He might in some cases. In some cases it is just,
19 you know, the one second that it would take him to reach
20 over to a tray or to decide which bundle in his arms he is
21 going to take first.

22 Q So he hasn't already done that before he's gotten
23 to the receptacle?

24 A In this scenario, no. That is why it does take a
25 very, very short period of time just to get ready at the

1 typical stop. Does it happen at every single stop possible?
2 No, I don't think so, but that is why we are measuring on
3 average it's about one second.

4 In other cases I could see where it would be
5 virtually nonexistent. It would be virtually zero, as I
6 have said in interrogatory responses, so it is on average it
7 is one second. Sometimes -- you know, it is the average of
8 one second because sometimes it takes longer to get ready.

9 Q Well, maybe I misunderstood what you said earlier
10 but I thought when I asked you is it the same amount of time
11 at every stop, I thought you said that in your mind it had
12 to be, conceptually.

13 A Let me clarify that. We have to measure it the
14 same at every stop because we don't have the data, at least
15 not now, that would allow us to explore any hypotheses as to
16 how it might vary from one stop to another, now it might
17 vary for example in response to differences in stop type or
18 delivery type, curb versus walkup versus dismount, whatever,
19 NDCBU.

20 So to be precise, the way we are constrained to
21 measure it constrains us to measure it as an amount of time
22 which based on what we know is the same at every stop,
23 because we have no other basis, given the limitations of the
24 data to measure it as a function of anything in particular.
25 We can speculate, but we can't convert such speculation into

1 any quantification.

2 Q Well, again, maybe I misunderstood something you
3 said earlier, but I thought you said if there were any
4 variation in this activity, it would have been picked up by
5 the elemental load. Did I misunderstand?

6 A The elemental load is picking up variations in
7 time that are volume related. The variations in fixed time
8 at stop that we have been speculating about are variations
9 that don't related to volume, but relate to the way in which
10 the stop is accessed, what type of receptacle. Is the
11 carrier still walking at the point where he would be
12 loading, or does he stop and wait for a few seconds?

13 That is how I -- you know, all the different
14 scenarios that you have brought up are ones in which what is
15 varying is not volume, and the stops effect is fundamentally
16 fixed with respect to volume loaded. It may not be fixed
17 with respect to other factors, and that is what I think we
18 have been discussing.

19 Q So, in principle, it wouldn't be necessary that
20 this fixed time at stop be the same at every stop, is that
21 correct?

22 A What is important is that it is a part of time
23 that doesn't vary with volume at the stop. So whether it
24 varies with some other factor besides volume from one stop
25 to another does not affect that essential feature of fixed

1 time at stop, which is that it doesn't vary with volume at
2 the stop. If it did, it would be part of elemental load
3 time.

4 Q Okay. We looked at your equation for load time,
5 and we went through the elasticities, and we agreed that, at
6 least for now, when you sum up all those elasticities, and
7 multiply them times the total load time, you are still left
8 with something.

9 A Well, let's be more specific. What we actually do
10 is we deduct this estimated fixed time at stop from the load
11 time because it is not -- we define it as something not
12 dependent upon volume, that is not a function of volume, so
13 we deduct it from the total load time. We have been doing
14 that since the last rate case. And this fixed time at stop
15 that we deduct is analyzed as access time. We give it the
16 same variability and distribution key that we give access
17 time. So it is the load time that remains after that
18 deduction that we perform the operation you just described
19 on.

20 Q Okay. But whether you do -- regardless of the
21 order of those two operations, there is still something left
22 over.

23 A Left over, you mean after you --

24 Q There is still some load time unaccounted for, is
25 that correct?

1 A When you deduct the elemental load from the total,
2 this new total that I have -- yes. And I regard that the
3 same, exactly the same way that you would regard the excess
4 of accrued mail processing manual letter distribution costs
5 over the volume variable portion. It is just an amount of
6 variable cost that is not attributed. I mean it is nothing
7 unique here. This treatment will be the same as you find in
8 many, many cost components throughout the CRA. Any of the
9 mail processing cost pools, if you believe the variability
10 is, say, 80 percent, you multiply by the total accrued, you
11 get volume variable.

12 What do you call what is left over? You can call
13 it whatever you want, but conceptually it is exactly the
14 same thing that you are talking about here with respect to
15 load time. It is just institutional cost, it is cost that
16 is not volume variable and, therefore, not distributed to
17 products to measure marginal costs.

18 So it is no different here than it is in any other
19 cost component, and there is no more need in this case to
20 make a big fuss about it and call it coverage load and do
21 more machinations than there is for any other cost pool.
22 Once we have deducted the volume variable costs from the
23 total, what we have left over we call institutional and that
24 is it, we stop right there. There is no reason that we
25 shouldn't do the same procedure here for load time, that I

1 can see. There is certainly no activity-based costing
2 justification for going beyond that point.

3 Q I am probably going to regret this question. Are
4 you familiar with the concept of incremental cost?

5 A Yes, I am.

6 Q How much of coverage related load time is
7 incremental cost?

8 A Some modest portion. Keep in mind, all of the
9 excess of total accrued load time over volume variable is
10 variable cost in the sense that it is cost that will go to
11 zero if all volumes go to zero. So, it is, therefore, some
12 of that cost will be incremental to individual products.
13 None of it is a fixed cost whatsoever, it is all labor cost.
14 There is capital, there is no cost of anything that is
15 normally regarded as fixed. So it will still go exactly to
16 zero when volume falls to zero, and that is exactly why -- I
17 mean that is a feature of incremental cost, it is a measure
18 of how much cost goes down when volume for a particular
19 product goes to zero. So, yes, some of it is incremental,
20 and Witnesses Kay and Bradley have shown that.

21 Q And the portion that is incremental, the portion
22 of load time beyond elemental load time that would be
23 incremental to a particular product, would be the cost of
24 all the stops that receive only that product?

25 A Well, we are still talking, I think, about cost at

1 one stop. Now, the incremental cost would exceed the volume
2 variable cost for a product at a particular stop because the
3 volume variable cost is picking up just the affect of one
4 unit, like a one piece reduction, say, in that product. The
5 incremental cost is picking up, it is measuring the total
6 cost reduction that would result if you reduced the volume
7 for that product all the way to zero per unit of that
8 product.

9 Q All right. But for stops receiving other products
10 in addition to the other product that we are removing, there
11 wouldn't be any change in cost there, would there, other
12 than the marginal load time cost from the change in the
13 volume of the one product?

14 Did that make sense?

15 A Well, you are distinguishing two situations. In
16 the first, the marginal cost situation is where you measure
17 the marginal cost -- this is just the volume variable cost
18 per piece, same thing. You measure the cost reduction that
19 results when you go, say, from 10 pieces of letters being
20 loaded to nine pieces.

21 Now envision that as a per piece. It is the
22 reduction in cost per piece. Now ask yourself what would
23 happen if you reduce those pieces from 10 to zero. What
24 would be the cost savings, the cost reduction, and then
25 divide that by 10 pieces, what would be the resulting cost

1 per piece?

2 The answer is it will be an amount higher than
3 that initial marginal cost per piece. That is clear,
4 because you will save obviously more load time when you go
5 from 10 to zero than when you go from 10 to nine, and that
6 is indeed how it is measured.

7 I mean if you look at Witness Kay's incremental
8 cost measurements for load time, that is the case, the
9 incremental cost per piece for each product is somewhat
10 higher than the marginal cost for load time in particular,
11 as well as for other cost components.

12 Q Could I ask you to look at your Equation 1 again
13 on page 4?

14 A Okay.

15 Q Couldn't we use this equation to estimate the
16 fixed time at stops?

17 A Yes, it is conceivable that you could measure it
18 as the intercept. The problem is that for MDR and BAM when
19 you measure fixed time at stop in this way you get large
20 negative and we actually looked at that and we considered
21 that possibility and rejected it for the very reason I just
22 gave.

23 Q When you talk about the intercept, are you
24 referring just to the alpha term in the equation?

25 A No, actually that is a good point. The intercept

1 is really not just the alpha but the sum of all the
2 coefficients for the receptacle and container dummy
3 variables that are represented by the capital R, sub i and
4 capital C, sub j.

5 You have to view the intercept as sort of the --
6 some sort of weighted average of all these different dummy
7 variable coefficients plus the alpha.

8 Q Well, could you remove the effect of the dummy
9 coefficients from that intercept? Would you then just be
10 back to the alpha?

11 A That would be one -- I wouldn't recommend it. It
12 is not going to work because the alpha is still negative in
13 some cases. I mean you would be saying in effect that the
14 receptacle and container dummy variables can be regarded for
15 this exercise as having no effect on load time, which is
16 absolutely wrong.

17 They have a big impact on load time, which is one
18 reason, by the way, that I am focusing on delivery points
19 and the distribution of delivery points across routes and
20 zip codes rather than the distribution of routes across the
21 zip codes, because the characteristic of a delivery point is
22 very critical in the load time analysis and that is what
23 these receptacle and container dummies are picking up, so I
24 would not recommend setting them equal to zero. It wouldn't
25 work anyway.

1 Q And you have estimated values for the gammas and
2 the deltas, is that correct?

3 A I don't -- I have not estimated these load time
4 regressions. I have taken the regressions that the Postal
5 Rate Commission estimated in its R90 decision.

6 Q Are there?

7 A Yes. Each equation has a number of coefficients
8 for both the receptacle and container dummies that are
9 estimated in a highly significant -- they have high T
10 statistics.

11 Q So when you talk about an intercept term you are
12 talking about applying those gammas when these dummies are
13 one and adding them to the alpha, is that --

14 A Why don't I tell you exactly what is done for
15 purposes of the elasticity calculation. This is something
16 that all parties have agreed to, by the way, and something
17 that has been done for many years.

18 What we do is we substitute for th receptacle and
19 container dummies the average value of the dummy variable,
20 so if a particular container dummy, for example, is observed
21 for 30 percent of all the datapoints in the regression
22 dataset, then we substitute a value of .3 for that container
23 dummy or receptacle dummy.

24 That procedure everyone has agreed to as to how to
25 calculate in effect an average intercept term.

1 Q Are those averages going to sum to one?

2 A No. No, they don't sum to one. These dummy
3 variables are like any other variables. They are picking up
4 real phenomena. I mean they are not percentage variables in
5 terms of what their coefficients are doing.

6 Q I don't mean the gammas. I referring to the value
7 of the dummy that you are substituting?

8 A Oh, I'm sorry, yes. Yes, the -- well, they would
9 if you had all the containers, if your particular equation
10 had all the container dummies on the right-hand side, then
11 they would but that is never the case. It's just the way it
12 was estimated. Certain dummies that are obviously
13 considered to have T statistics that were too low or
14 whatever were deleted but if they were all in there, then
15 yes, it would sum to one, the values of the dummies that are
16 substituted.

17 Q Treating the intercept as the estimate of the
18 fixed time at stops is the same as setting all volumes to
19 zero, is that correct?

20 A Yes. That I think is the appeal of it. The
21 intercept is telling you what is the load time at zero
22 volumes. That would seem to be a good measure of how much,
23 you know, what is the fixed time at stop, how much time is
24 spent at each stop independent of the volume.

25 The problem of course, as I mentioned, is that for

1 the MDR and BAM equations you get negatives when you follow
2 this approach. SDR you actually get -- I forget -- but a
3 couple seconds.

4 Q Would it be possible to rerun the regressions with
5 constraints that would prevent the intercept from being
6 negative?

7 A Yes, you can certainly try that. It is very
8 problematic because often what happens is your R square goes
9 down, way down. You sacrifice a lot for the other
10 coefficients. Some of the other coefficients become
11 nonsensical. I mean it's something you could try.

12 Q Well, if the notion of getting the value of a
13 regression equation when all the volumes are zero is
14 attractive as a means of estimating the fixed time at stop,
15 wouldn't you want to at least try?

16 A In all honesty, I never thought about doing that.
17 I have tried in many -- in completely different contexts to
18 put prior constraints on regression coefficients. It is
19 usually not successful. It usually causes the other
20 estimated coefficients to go haywire, to become nonsensical,
21 so you would get results, for example, if that were to
22 happen here you would get negative marginal load times, but
23 having said that, in all honesty if someone tried it, I
24 would take a look -- it's something to look at.

25 It is something I had frankly never thought of

1 doing, mainly because every time I have done that kind of
2 thing in the past, I get lousy results, but it certainly
3 couldn't hurt to try in this case.

4 Q Now, rather than do that, you've estimated the
5 fixed time at stop a different way.

6 A That's right.

7 Q Could you describe that?

8 A Well, we thought that the fixed time at stop being
9 conceptually an increment of time that is not a function of
10 volume, ought to be very close to the relatively small
11 amount of time that you'd observe when a carrier delivers
12 just one letter piece.

13 Another way of looking at it is, well, whatever
14 the fixed block of time might be, it's got to be less than
15 the amount of time with a minimum amount of observed time
16 for loading just one postcard or letter piece.

17 So we regard that as sort of the upper bound, and
18 said, well, whatever this is, it's going to be less than
19 just the amount of time required to deliver one letter
20 piece.

21 And we looked at the 1985 observations for all
22 cases where just one letter was delivered, and we found that
23 the lowest values observed within that subset, were .04
24 second, virtually zero.

25 So, we concluded, well, we don't want to use .04

1 because that is, in effect, saying there is no coverage
2 effect whatsoever. And the weight of all the analysis in
3 the past and all the discussion had been that, yes, there is
4 a coverage effect.

5 So we said, well, let's take the lower 20 percent
6 of all these observed times and take the average of all the
7 times within this lower 20 percent bound, and view that as
8 our best estimate of what this time must be.

9 Because if we took the absolute lowest, we'd get
10 zero, which gets back to my point that, you know, some
11 people argue that it is zero, and I am somewhat sympathetic.

12 But having -- but being in a situation where you
13 have to make a decision, and hearing from all the
14 operational people that there is this phenomenon, there is
15 this coverage effect, we felt, well, this is the best way to
16 do it to come up with some measure that is at least a
17 significant amount of time.

18 And it does abate a requirement that it's fixed
19 with respect to volume, like this intercept would be, if it
20 was not negative.

21 Q Okay, let me see if I've got this right. You
22 rejected the notion of using the lowest load time or the
23 lowest amount of time to load a single, letter-shaped piece?

24 A Right, because that was effectively zero, and to
25 choose such a time would be to take that additional leap of

1 saying, no coverage load whatsoever, there doesn't exist
2 such a thing.

3 And that rang contrary to what the operational
4 analysis had told us, and so we said, okay, you know, we --
5 it does exist, so how do we measure it as if it really does
6 exist? And that's why we chose this particular method.

7 Q Okay, you've rejected the lowest possible value
8 that you could have gotten?

9 A Right.

10 Q What sent you to the lowest 20 percent as to the
11 lowest ten percent or the lowest five percent?

12 A It was just our judgment, based on looking at the
13 distribution of values. Where did the distribution become
14 really flat? You know, where the times became quite uniform
15 at around one second, that was our judgment.

16 It was, frankly, a difficult decision. You say,
17 well, why not 22 percent? Why not 18? You know, my only
18 answer is that you've got to make a decision.

19 If you're going to measure this thing, you've got
20 to make a decision on some kind of a cutoff point.

21 If you choose the absolute lowest, you're taking
22 this big leap and saying coverage load doesn't exist. I
23 mean, that goes completely contrary to what everyone has
24 agreed to on all sides of this debate for many, many years.

25 So that's why we decided to follow this particular

1 approach.

2 Sure, we'd much prefer to have direct measures of
3 it. We don't have that.

4 Q Okay, when you say the bottom 20 percent, that
5 means you've ordered all the times and put the shortest time
6 here near the zero point on a graph, and all the other times
7 in order of increasing time after that?

8 A That's right.

9 Q And you're saying that it flattened out after you
10 got to one second?

11 A It wasn't the perfect flattening out that you'd
12 like to see. It's just our best guess as to where we should
13 draw the line. You have to draw the line somewhere.

14 It wasn't very scientific. It's just the best
15 that we thought could be done, given the data limitations.

16 Q But you did look at that ordered distribution?

17 A Right, right.

18 MR. COSTICH: Mr. Chairman, could I ask that that
19 graph, I guess is what it would be of the ordered
20 distributions of time, be provided?

21 CHAIRMAN GLEIMAN: I think you just did.

22 THE WITNESS: I don't have it now, but I could get
23 it.

24 CHAIRMAN GLEIMAN: Sure. And, Mr. Costich, can I
25 ask a question at this point? Can you tell us how much

1 longer you think you might go?

2 MR. COSTICH: Not a bit, Mr. Chairman.

3 CHAIRMAN GLEIMAN: Not a bit longer?

4 MR. COSTICH: I'm through.

5 CHAIRMAN GLEIMAN: You're through, all right.

6 Well, if that's the case, I think we're going to break for
7 lunch now and come back at quarter till 2:00. However,
8 before everybody gets up and runs out of the room, I want to
9 remind counsel for UPS and for the National Newspaper
10 Association, if they are here, that we're going to talk with
11 Postal Service counsel during lunch and give us a sense of
12 what the situation is with the motions that are outstanding,
13 re the bulk RPW report.

14 Now, there is one other matter I would like to
15 bring up and have you all think about during lunch. It
16 would appear to me that given that we still have several
17 intervenors who wish to cross examine this witness, and the
18 likelihood of followup and redirect and the like, that we're
19 going to get started fairly late this afternoon on Witness
20 Raymond.

21 That's just a guess. I've learned that you never
22 can tell how things are going to work out in the hearing
23 room and it could go quickly.

24 But it's also my feeling that Witness Raymond is
25 likely to be on the spot for quite awhile. What I would

1 propose, rather than going into the wee hours of the
2 morning, if it comes to that, inasmuch as we do not have a
3 hearing scheduled for tomorrow, perhaps when we get to a
4 reasonable hour this evening, and I don't know exactly how
5 we define that -- I have to look at all the variables and
6 see what the regression analysis spits out -- but when we
7 get to a reasonable hour this evening, perhaps we would call
8 it for the day and resume tomorrow morning and finish up
9 with Witness Raymond.

10 This is just a proposal. It depends on the
11 availability of the witness and counsel for the intervenors,
12 as well as my colleagues. So if everyone would give some
13 thought to that possibility, and if it appears as though a
14 key player is not available tomorrow, I need to know that
15 because that certainly will influence any decision we make
16 about how late we go this evening.

17 Don't anyone feel pressured now. Enjoy your lunch
18 and see you in a little bit more than an hour.

19 [Whereupon, at 12:42 p.m., the hearing was
20 recessed, to reconve this same day at 1:45 p.m.]

21

22

23

24

25

A F T E R N O O N S E S S I O N

[1:49 p.m.]

1
2
3 CHAIRMAN GLEIMAN: Before we pick up with
4 cross-examination of the witness, and I believe the
5 periodical mailers group is next, so if you are going to do
6 some cross, Ms. Noble, you may want to --

7 MS. NOBLE: The periodicals mailers are satisfied
8 that Mr. McLaughlin and other questioners asked the
9 sufficient questions that we were interested in, and so we
10 will at this point not ask any further cross-examination of
11 the witness.

12 CHAIRMAN GLEIMAN: Thank you. That would bring us
13 up to United Parcel Service. But before we get to United
14 Parcel Service, there were two issues that I tossed out
15 there right before we broke for lunch. One has to do with
16 those outstanding motions to compel involving the Bulk RPW
17 report. It is my understanding that the National Newspaper
18 Association is more or less satisfied at this point and does
19 not plan to pursue the line that they were pursuing any
20 further.

21 MR. HOLLIES: I received a voice message from
22 National Newspaper Association counsel, who specifically
23 authorized me to make three representations on her behalf.
24 One, NNA is indeed satisfied with respect to its previously
25 filed motion to compel responses to T-5-36 and 39.

1 Second, with respect to an objection filed by the
2 Postal Service, I believe yesterday, with respect to an
3 institutional interrogatory, NNA/USPS-15, that they do not
4 expect to be filing any motion to compel or otherwise
5 following upon that, largely for the reasons recited in the
6 documents filed at that time.

7 And, third, that NNA does not have any plans at
8 this time to recall Witness Hunter to the stand.

9 CHAIRMAN GLEIMAN: Thank you, sir. That is not
10 inconsistent with what I sort of kind of heard.

11 Mr. McKeever, where are things from your
12 perspective?

13 MR. MCKEEVER: Thank you, Mr. Chairman. Mr.
14 Hollies and I did speak over the lunch break, and I have had
15 an opportunity to review the document that was filed last
16 Friday. What the Postal Service is offering to provide is
17 not completely clear to us. As best we can understand it,
18 it is indicated at the bottom of page 9 and top of page 10
19 of their filing, and that indicates or suggests that the
20 Postal Service is offering to provide, and I am quoting
21 here, "a file which includes the data elements necessary to
22 start from the electronic equivalence of postage statement
23 data and roll that data up to the point of replicating the
24 Parcel Post BRPW input files." That is the end of the
25 quote.

1 I wasn't sure when I read that exactly what that
2 mean when they referred to the data elements necessary to
3 start from the electronic equivalence of postage statement
4 data. We had asked for an electronic file at the postage
5 statement level, among other things.

6 Now, in my conversations with counsel for the
7 Postal Service, I understand that the intent is to provide
8 us with an electronic file of postage statement level data.
9 If that is the case, then that could possibly take care of
10 some but not all of the interrogatories that are at issue in
11 our motions to compel. It would take care of, of course,
12 the interrogatory that asks for postage statement level
13 data, as well as those interrogatories that ask where the
14 data is kept, how it is kept, the number of offices at which
15 it is kept and that type of information.

16 I am not in a position right now, because of the
17 number of interrogatories involved, to identify specific
18 interrogatories. However, we would be prepared to file
19 something tomorrow that would identify the interrogatories
20 that would be taken care of if, in fact, the information
21 furnished is an electronic copy of postage statement level
22 data.

23 But I do want to emphasize that we have had some
24 misunderstandings, unfortunately, with Postal Service
25 counsel before when we thought certain types of data was

1 going to be provided, and then we received the data and it
2 was somewhat different from what we thought. So our request
3 would be that when we identify those interrogatories, the
4 motions to compel with respect to those be held in abeyance
5 pending receipt of that information.

6 Now, the concern we have about that, of course, is
7 that it does entail additional delay. My understanding from
8 the Postal Service's filing is that it would take them about
9 15 days to provide what they have offered to provide in
10 their filing, and we are in much the same situation as the
11 city carrier situation that was discussed earlier this
12 morning. We, I think, will undoubtedly need some relief
13 from the Commission, and we will make a filing requesting
14 this relief with respect to the filing of rebuttal testimony
15 on the BRPW issue. And, as I mentioned we will put
16 something on paper and make that filing, so that it is clear
17 what specific relief we are requesting.

18 I might point out that the information that the
19 Postal Service is now offering to provide, if it is in fact
20 an electronic copy of postage statement level data, could
21 have and should have been offered to us long ago, shortly
22 after we first asked for that information, without the need
23 for motions to compel, et cetera, and, instead, we have, of
24 course, been forced to wait all this time, only to reach the
25 point that we tried to reach a long time ago, not only as a

1 result of informal discussions, but also by motions
2 practice.

3 The final comment I would make is that even
4 providing that information, however, that does not resolve a
5 number of requests for information in other interrogatories
6 which go beyond, or are in addition to, I should say,
7 requests for postage statement level data. In particular,
8 for example, we have a request for some information that
9 underlies Library Reference I-279, which is separate and
10 apart from the PERMIT System database. We have requests for
11 information regarding a survey that was used in coming up
12 with a blow-up factor that took the BRPW data and increased
13 the volume estimates on account of nonautomated sites. We
14 have asked for hard copy postage statements for only three
15 records in the BRPW database.

16 The Postal Service has, in connection with an
17 audit report, involving acceptance of mail at Bulk Mail
18 Entrance Units, provided some postage statements pursuant to
19 protective conditions. That was in connection with other
20 discovery requests where we did reach an accommodation and,
21 as a result, a motion to compel with respect to that was
22 withdrawn. It also provided in that connection a number of
23 Form 8125s, which are not postage statements, but are often
24 used in conjunction with postage statements in the case of
25 plant verified drop shipments and contain a lot of the same

1 types of information.

2 But we have requested hard copies of postage
3 statements for only three records in connection with the
4 BRPW situation, in addition to an electronic file of the
5 postage statement level data. So those interrogatories,
6 even with the Postal Service's offer, would still remain on
7 the table. Those motions to compel would still remain
8 outstanding, and, as I indicated, we will identify
9 specifically what interrogatories that involves within the
10 next day.

11 One final word, the Postal Service has repeatedly
12 stated in its filings that UPS is interested in seeking why
13 the Postal Service switched to the use of BRPW data. To the
14 extent that is leading the Postal Service to take some of
15 the positions it is taking, I want to clear up that
16 confusion. We are not asking why. We think we know why,
17 that data had a drastic impact on the cost coverage for
18 Parcel Post. The real question is the accuracy of the data
19 on which they rely.

20 CHAIRMAN GLEIMAN: I think I have to give a
21 little, maybe not equal, but a little time to Postal Service
22 counsel, and then we will look forward to receiving your
23 filing tomorrow that outlines which interrogatories fall on
24 which side of the fence, as it were, understanding that you
25 are doing so on the assumption that you are indeed going to

1 get the statements, the postage statements that you
2 requested. And as was the case when Mr. McLaughlin spoke
3 this morning on behalf of Advo, parties rights are reserved
4 to make whatever motions and to ask for whatever relief they
5 think may be necessary in order to keep them whole, as it
6 were, in terms of the proceedings. You know, we fully
7 expect we will be hearing from more than a few.

8 MR. HOLLIES: Mr. Chairman.

9 CHAIRMAN GLEIMAN: Mr. Hollies.

10 MR. HOLLIES: If I could respond briefly. I would
11 point out that the information the Postal Service has
12 indicated could be made available, but has not offered as
13 such to make available, is not the same information that was
14 previously requested by UPS. The Postal Service has gone to
15 some effort to find a way to provide a window into that
16 information and we have indicated what could reasonably be
17 done. It is postage statement level information, as I did
18 indicate to Mr. McKeever.

19 In light of the indication by Mr. McKeever here
20 today that he wishes both to maintain independent
21 objections, which is certainly not a problem, but also
22 reserve the right to take a look at the information and come
23 back at us if it is not what he thinks it is, I believe we
24 have been very forthright in giving, in describing what we
25 have given, and that his indication that we have basically

1 not been providing what we said we were providing is unfair
2 and inappropriate.

3 I think the net result of all this, Mr. Chairman,
4 is that the Postal Service would prefer to see a ruling on
5 all of the outstanding motions to get an idea of where it
6 stands and what effort is necessary and to get that ruling
7 when the Commission can issue it.

8 CHAIRMAN GLEIMAN: I just want to make sure I
9 understand. You are saying then that whatever discussions,
10 and it is obvious it was a discussion and not a dialogue,
11 took place over the lunch break between counsel for UPS and
12 counsel for the Postal Service is for all intents and
13 purposes from the Postal Service's standpoint off the table?

14 MR. HOLLIES: No, that is not correct. The Postal
15 Service filing of last Friday indicated what could be
16 provided, indicated also how that information is, if you
17 will, extracted from Postal data systems and given to a
18 third party contractor, and the Postal Service has further
19 indicated that that information does reach back to the level
20 of postage statements but it is not in and of itself postage
21 statement information, and I was just trying to point out
22 that we have made some real effort here to accommodate UPS's
23 interest.

24 The indication that Mr. McKeever made, that we
25 should have provided this before, I do not think is a

1 correct, accurate or fair statement. The Postal Service has
2 gone to great lengths to find a way to permit what we
3 understood UPS to be interested in doing, to find a way that
4 that could be made to happen, and if there is still a
5 substantial amount of burden involved with that avenue, but
6 we thought that that was information that the Presiding
7 Officer could use in considering the respective motions to
8 compel and our responses.

9 CHAIRMAN GLEIMAN: Well, it looks to me like the
10 four motions to compel are still on the table.

11 Mr. McKeever, I look forward to receiving whatever
12 it is that you intend to file tomorrow and I will rule on it
13 in the context of the discussion once I have had a chance to
14 look at the transcript, because I am not smart enough to
15 understand all that was just said.

16 MR. MCKEEVER: Well, Mr. Chairman, if I may, I am
17 not sure there is any point to us filing anything tomorrow
18 then. The Postal Service has apparently stated that --

19 CHAIRMAN GLEIMAN: Fine. We will rule on the
20 motions to compel. I don't know whether they will be ruled
21 on tomorrow or not, but they will be ruled on in fairly
22 short order and we'll take it from there and we'll just see
23 what happens.

24 Hopefully Mr. McLaughlin will have better luck.

25 With that, I think we are -- Mr. Baker is not back.

1 in the room and the reason I mention that is he, to the best
2 of my ability to ascertain, is the only one who plans to
3 cross examine on behalf of his client, the Newspaper
4 Association of America, Witness Raymond, who is not in the
5 room, so I am going to wait until he reappears and find out
6 what his schedule is tomorrow and then we will make some
7 kind of determination on that other matter that we left
8 hanging when we went to lunch.

9 In any event, Mr. McKeever, fire at will.

10 MR. MCKEEVER: Thank you, Mr. Chairman.

11 CHAIRMAN GLEIMAN: But not at the witness.

12 [Laughter.]

13 MR. MCKEEVER: Never at the witness.

14 Whereupon,

15 DONALD M. BARON,

16 the witness on the stand at the time of the recess, having
17 been previously duly sworn, was further examined and
18 testified as follows:

19 CROSS EXAMINATION

20 BY MR. MCKEEVER:

21 Q Mr. Baron, John McKeever for United Parcel
22 Service -- not that you -- you probably guessed that by now.

23 The load time regressions that are the subject of
24 your testimony evaluate the impact of a number of factors on
25 load time costs, is that correct?

1 A Yes.

2 Q And receptacle type is one of those factors?

3 A Correct.

4 Q And a receptacle means the kind of delivery
5 receptacle at a particular stop?

6 A Correct.

7 Q For example, it might be a letter slot in a door?

8 A Yes.

9 Q Or a mailbox on the curbside?

10 A Yes.

11 Q Or boxes in apartment buildings?

12 A Yes.

13 Q They are examples of receptacles?

14 A They are.

15 Q Okay. Another factor is container type, is that
16 correct?

17 A Yes.

18 Q Can you give me some examples of what that refers
19 to?

20 A Well, why don't I just read from the direct source
21 so I make sure that I cover everything.

22 There are six container type codes. One is
23 bundled mail, a second is tray, a third is sack or pouch, a
24 fourth is hamper/hand truck/cart -- let me restate that --
25 hamper -- slash -- hand truck -- slash -- cart -- slash --

1 other wheeled container. Another one is not really a
2 container type. It's just loose mail. The final one is two
3 or more of the above, so I mentioned six and they actually
4 constitute up to six container type dummies where each dummy
5 would equal one if the particular container type that it
6 represents was observed in the given observation recorded on
7 whatever record you are looking at.

8 Of course you would never have all six in the
9 regression at once and in fact no regression contains even
10 as many as five. Different regressions contain different
11 subsets of these dummy variables.

12 Q Okay. The other factors are collection volume, is
13 that correct?

14 A That is correct. That is one of the volume
15 variables.

16 Q Right, and volume of accountables?

17 A Yes.

18 Q And volume by shape, is that correct?

19 A Right. You have volume by shape, which would be
20 letters, flats, parcels. You have accountables and
21 collections.

22 Q Okay, and each of those factors, receptacle type,
23 container type, collection volume, volume of accountables,
24 and volume by shape -- that is, letters, flats and
25 parcels -- are separately identified because they may have

1 different effects on load time, is that correct?

2 A That's correct.

3 Q For example, delivering an accountable item will
4 likely have a different impact than delivering a letter, is
5 that correct?

6 A Correct.

7 Q And delivering a parcel will have a different
8 impact on load time than delivering a letter?

9 A Yes.

10 Q Okay. Now last week when we talked to Mr.
11 Harahush, he indicated that in the city carrier cost study
12 the term "parcel" was defined in terms of a piece that could
13 not be cased in a letter case or in a flat case.

14 I take it that is also your method of defining a
15 parcel, is that correct?

16 A That is indeed the definition used to produce the
17 data that were used to estimate these regressions, these
18 load time regressions.

19 Q Okay, and in response to questions from his
20 counsel on redirect, Mr. Harahush pointed out that the city
21 carrier cost data also records the subclass of a parcel, for
22 example. You agree with that also, I take it?

23 A The city carrier CCS does record the subclass of a
24 parcel, yes.

25 Q Okay. Am I correct that the distribution of load

1 time costs, elemental load costs, is done first on the basis
2 of shape and then on the basis of subclass?

3 A Essentially that is correct because what happens
4 is that the elasticity of the particular load time equation
5 that you are looking at is multiplied by total accrued cost,
6 however that may be defined, and that produces a pool of
7 what you would call volume variable parcel costs, and that
8 volume variable parcel cost is then distributed across
9 subclasses based on the CCS data.

10 Q Thank you. So as you describe, all parcels are
11 grouped together and given the same load time cost?

12 A That's right. There is one parcels variable in
13 each of the load time regressions and so once that pool of
14 volume variable parcel dollars is formed, that is the only
15 pool and that is how parcels get their cost distributed.

16 Q Now that cost doesn't differ then in the case of a
17 Standard A parcel as opposed to a Parcel Post parcel then?

18 A The distribution of -- let me make sure I
19 understand your question. Could you repeat that question?
20 I want to make sure I understanding it.

21 Q Sure. The cost that a parcel is given in the
22 study doesn't differ in the case of a Standard A parcel as
23 opposed to a Parcel Post parcel, is that correct? All
24 parcels get the same?

25 A Right -- well, as far as the load time regressions

1 are concerned, no distinction is made among subclasses, so
2 for purposes of performing that volume variable parcel cost
3 pool a parcel is defined strictly in terms of shape.

4 You know, a parcel is defined for what it is
5 because of its shape and there is no subclass distinction.
6 It is only when that pool of dollars gets distributed to
7 subclasses does the distinction between a Standard A and
8 Standard B become relevant.

9 Q And when you are at that step, that distribution
10 where you are breaking it up by subclass is done on the
11 basis of pieces?

12 A Correct.

13 Q So that a piece of Standard A -- a Standard A
14 parcel at one piece is treated the same as one piece of a
15 Parcel Post parcel, is that correct?

16 A Yes. That is the way the worksheets do the
17 distribution -- the cost allocation. Yes, indeed.

18 Q Okay, now, Standard A parcels way up to but not
19 more than 16 ounces; is that correct?

20 A I really don't know the answer to that question.

21 Q Okay. Do you know whether Parcel Post pieces can
22 weigh up to 70 pounds?

23 A I believe they can.

24 Q Now, we did provide to your counsel last week -- I
25 think it was Wednesday -- a potential cross examination

1 exhibit. Did you have a chance to take a look at that?

2 A Yes, I have it.

3 Q Okay, did you have a chance to determine whether
4 the numbers on that were accurate?

5 A I did not check every single number, but I checked
6 probably 90 percent, and it looks like it's clear to me that
7 this is just a copy of sheet 7.0.8 from CSO 6 and 7.XLS,
8 which is the main city carrier costing worksheet to produce
9 volume variable costs by product for city carriers.

10 MR. McKEEVER: Mr. Chairman, with your permission,
11 Mr. Baron indicated that he already has a copy, but I would
12 like to make copies available to others. I will have just a
13 very few questions on this exhibit. I have marked it as
14 UPS-XE-Baron-1.

15 [Exhibit Number UPS-XE-Baron-1 was
16 marked for identification.]

17 [Pause.]

18 BY MR. McKEEVER:

19 Q NOW, Mr. Baron, am I correct that there are a lot
20 more Standard A parcels than there are parcels in Parcel
21 Post; is that correct?

22 A There are approximately seven million more
23 Standard A.

24 Q Compared to Parcel Zone Rate?

25 A Oh, I'm sorry, I'm looking at the wrong thing.

1 Q Okay.

2 A Compared to just Parcel Zone?

3 Q Yes.

4 A Okay, sure. Over 300 million more.

5 Q Just so we're clear on the numbers, the parcels in
6 total Standard A is approximately 416 million pieces?

7 A Correct.

8 Q That's the column on the far right total, and
9 total Standard A, and the Parcel Zone Rate is about 164
10 million pieces?

11 A Yes.

12 Q Now, these are, of course, parcels on city regular
13 letter routes only; is that correct?

14 A Only letter routes, not special purpose routes.

15 Q Right. In fact, the Standard A is the single
16 largest category of parcels in city rate or letter routes;
17 is that correct, if you look at the Total column?

18 A Yes, it is.

19 Q Okay. And there are significantly more First
20 Class mail parcels than there are Parcel Post pieces; is
21 that correct?

22 A Yes.

23 Q And if you combine the volume of First Class
24 parcels with the volume of Standard A parcels, that total
25 dwarfs the number of Parcel Post pieces; is that correct?

1 A It's significantly higher, yes.

2 Q About 619 million versus 164 million?

3 A Yes.

4 Q Okay. Now, we agreed earlier that the cost of
5 each of those parcels -- the cost for all parcels is
6 combined together and distributed on a piece basis; is that
7 correct?

8 A Correct. That, however, is done separately for
9 the SDR, MDR, and BAM stop types, so there are three such
10 pools that are independently distributed.

11 Q Right, but within SDR, the parcels all are grouped
12 together, and then when it's broken out in the subclass, the
13 allocation is on the basis of pieces?

14 A That's correct.

15 Q Weight is not used to distribute load time costs
16 across subclasses; is that right?

17 A That's correct.

18 Q Could you turn to your response to Interrogatory
19 OCA/USPS-T-12-11(c), please?

20 [Pause.]

21 A T-12, what?

22 Q 11(c).

23 A 11(c).

24 Q Now, there were originally two OCA-T-12-11s, but
25 one was subsequently renumbered as T-12-12, and I'm

1 referring to the one that retained the numbering, T-12-11.

2 A Okay. This is T-12-11(c).

3 Q Yes.

4 A Please explain how, if at all, weight is used to
5 distribute elemental load time costs in the roll forward.
6 No, that is (b), I'm sorry, it is the next one.

7 Q You have the right interrogatory.

8 A Okay. I have got it now.

9 Q Just the wrong subsection.

10 A Yeah.

11 Q Now, you indicate in your response to (c), and I
12 am quoting here, "It is my understanding that weight has not
13 been used to distribute elemental load time costs because of
14 the view that shape alone is the primary mail characteristic
15 that determines why one piece takes longer to load than
16 another piece." Do you see that?

17 A Yes.

18 Q Now, you stated there that it is your
19 understanding that that was the case. I take it that wasn't
20 a subject you studied, is that correct?

21 A That is correct.

22 Q From whom did you get that understanding?

23 A Various operational analysts at the Postal
24 Service.

25 Q Okay. It wasn't Ms. Meehan or Mr. Raymond?

1 A No, because this analysis pre-dates my
2 acquaintance with Mr. Raymond. We are talking here about
3 the load time analysis, so this is --

4 Q And that is a 1985?

5 A Yeah, is the 1985 data set and the analysis
6 thereof, and, so, no, I didn't get this from Mr. Raymond.

7 Q And you didn't get it from Ms. Daniel?

8 A No.

9 Q You are aware, aren't you, of Ms. Daniel's
10 testimony, and I am quoting here from page 8, lines 26 and
11 27 of her testimony, that, quote, "It seems reasonable that
12 heavier pieces of the same shape may cost more to load than
13 lighter pieces of the same shape."

14 A Yes, I have seen that.

15 Q And, in fact, Ms. Daniel acted on that testimony
16 to the point that, as she testified, and, again, I am
17 quoting from pages 8 to 9 of her testimony, that, quote,
18 "Costs for the elemental load portion of street delivery
19 costs are allocated on the basis of weight within shape,
20 instead of on the basis of pieces, as the Postal Service did
21 in the last case." is that right? Do you remember that
22 testimony?

23 A I don't have any of Witness Daniel's testimony or
24 interrogatory responses, so I just can't recall.

25 Q Okay. I could show that to you, but let me make

1 it easier, I think.

2 A Okay.

3 Q You do know that Ms. Daniel did distribute the
4 elemental load portion of street delivery costs on the basis
5 of weight within shape for First Class presort and Standard
6 A parcels, do you recall that?

7 A The best I can say is that at one point in the
8 analysis that she had done, I had noticed some reference to
9 weight as a basis for distribution, but I just don't recall
10 anything specifically.

11 Q Okay. Now, you referred a moment ago to the 1985
12 load time study.

13 A Right.

14 Q Weight and class or subclass was not recorded in
15 that study, was it?

16 A That's correct.

17 Q Are you aware, Mr. Baron, that in his response to
18 interrogatory UPS/USPS-T-13-10, Mr. Raymond stated that in
19 the Engineered Standards database, a parcel was defined as a
20 package that weighs two pounds or more and/or is larger than
21 a shoebox?

22 A Yes.

23 Q Mr. Baron, could you turn to your response to
24 interrogatory MPA/USPS-T-12-6(b), please?

25 A Please repeat that.

1 Q Sure. MPA/USPS-T-12-6(b) as in boy. And,
2 actually, I would like to refer you to the chart reproduced
3 in that answer right before your answer to subpart (c).

4 A 6(b) is where I show a number of city routes by
5 delivery mode.

6 Q Exactly. Exactly.

7 A Okay.

8 Q And I am looking at the chart that appears right
9 before the beginning of your answer to (c).

10 A Okay.

11 Q Am I correct, I just want to make sure I am
12 reading this right, that there you list a total of \$166,170
13 -- excuse me, \$166,107 city routes?

14 A Well, I don't show the total here. I would just
15 have to take your word for it that that is what the sum of
16 these.

17 Q Are you sure? Look at the very last line in the
18 chart, right before your answer to (c), it says "Total."

19 A I was on the wrong page. Okay. Sorry. Yes.

20 Q Okay. Now, is that data for Postal Quarter 4,
21 Fiscal Year 1997?

22 A Yes, it is.

23 Q Okay. And that total does not include special
24 purpose routes?

25 A That is my understanding. These numbers come from

1 the carrier route master file and my understanding is that
2 that file only records city carrier letter routes.

3 Q Okay. Is the same information, the total number
4 of city routes, available for Fiscal Year 1998 and 1999, do
5 you know?

6 A Yes, it is.

7 MR. McKEEVER: Mr. Chairman, I would like to
8 request that that information be supplied, and that would
9 conclude our cross-examination.

10 THE WITNESS: You want just this table?

11 MR. McKEEVER: Yes.

12 THE WITNESS: Just (b)?

13 MR. McKEEVER: Yes.

14 THE WITNESS: For '98 and '99?

15 MR. McKEEVER: Yes.

16 THE WITNESS: Okay.

17 CHAIRMAN GLEIMAN: Mr. Cooper, will you see that
18 we get that material?

19 MR. COOPER: I will add it to my list, yes.

20 CHAIRMAN GLEIMAN: Thank you.

21 MR. McKEEVER: And that concludes our
22 cross-examination, Mr. Chairman.

23 CHAIRMAN GLEIMAN: That brings us to follow-up.
24 Mr. McLaughlin.

25 CROSS-EXAMINATION

1 BY MR. McLAUGHLIN:

2 Q Mr. Baron, I just have -- I didn't have any
3 follow-up, but I do now, follow-up on Mr. McKeever's
4 questions where he referred to Witness Daniel. Now, when
5 Witness Daniel used weight as a distribution key for
6 elemental load cost, do you recall specifically the issue
7 that she was addressing? What rate structure issue was she
8 addressing, do you recall?

9 A It had something to do with allocating costs
10 across weight category.

11 Q Do you recall whether it happened to involve the
12 Postal Service's proposal to reduce the pound rate for ECR
13 mail? You don't recall?

14 A No, I really don't know very much about this whole
15 area at all.

16 Q Okay. You don't recall whether she ever said that
17 she was proposing to do that simply to be conservative?

18 A No, I don't.

19 Q You don't recall that. Do you recall her ever
20 saying that she was doing it so that she would avoid the
21 argument from somebody else claiming that her analysis for
22 pound rate purposes was understated, you don't recall that
23 either?

24 A Well, we never discussed any of these issues.

25 Q Okay. So she was not talking about that issue

1 from the same standpoint that you were? She was not talking
2 about how carrier costs should be costed, she was talking
3 about the analysis that she wanted to do for pound rate
4 purposes? Well, I take it back -- you just don't know?

5 A I just don't know.

6 MR. McLAUGHLIN: Okay. No further questions.

7 CHAIRMAN GLEIMAN: Is there any further follow-up?

8 [No response.]

9 CHAIRMAN GLEIMAN: No additional follow-up.

10 Questions from the bench? Commission Omas.

11 COMMISSIONER OMAS: Thank you. Mr. Baron, in your
12 answer to Advo/USPS-13-58(e), Witness Raymond says that his
13 engineered study data includes the proportions of time that
14 a carrier spends on his route fingering mail while walking.
15 If fingering the mail slows the carrier down, should this
16 time be considered load time or access time, or something in
17 between? And, also, how should it affect its variability to
18 be modeled?

19 THE WITNESS: I didn't catch that last part about
20 effect.

21 COMMISSIONER OMAS: How should these variabilities
22 be modeled?

23 THE WITNESS: Okay --

24 COMMISSIONER OMAS: First of all, would you
25 consider it load time, access time, or something in between?

1 THE WITNESS: If I understand what you are saying,
2 you are talking about a carrier walking along a route, and
3 while doing so, is fingering the mail, but slows down,
4 nevertheless continuing to walk, that is clearly route
5 access, what we call route access FAT.

6 It's not load time, because the carrier, if I have
7 stated what you hypothesized correctly, that carrier has not
8 reached a delivery point, is not at a delivery point.

9 The carrier is still walking, so that would not be
10 load time; it would be what we call route access FAT.

11 COMMISSIONER OMAS: So how should its
12 variabilities be modeled?

13 THE WITNESS: The variability of the cost of that
14 type of walking time is determined as follows:

15 First, the variability of that time with respect
16 to the number of actual customer stops is determined. And
17 that is multiplied by the total amount of the time to
18 produce what is known as accrued access time.

19 And then that accrued access time is calculated as
20 a function of volumes through the use of the so-called stops
21 equations.

22 So, from the stops equations you get the
23 elasticity of actual stops with respect to volume, and the
24 product of those elasticities and this accrued access time
25 is what gives you your volume variable cost by product.

1 That is, in a nutshell, the variability analysis
2 for route access FAT walking time.

3 COMMISSIONER OMAS: Thank you, Mr. Baron. Thank
4 you, Mr. Chairman, that's all I have.

5 CHAIRMAN GLEIMAN: Commissioner Covington?

6 COMMISSIONER COVINGTON: Good afternoon, Mr.
7 Baron.

8 THE WITNESS: Good afternoon.

9 COMMISSIONER COVINGTON: I have a few general
10 questions I'd like to seek some clarification on.

11 I notice that your last appearance here was in
12 R97-1, where you appeared somewhat in a like capacity, not
13 only to give direct, but it was required that you come back
14 and even be a rebuttal witness, so to speak. And we
15 appreciate your contribution to the record back then.

16 Was the last curve line in foot access tests that
17 was conducted in 1988, is that the last actual CAT/FAT?

18 THE WITNESS: Yes, it is.

19 COMMISSIONER COVINGTON: And street time sampling,
20 the STS, I would imagine, with the exception of what Mr.
21 Raymond has done, based on in 1996 and '98 carrier survey,
22 that the last time data was compiled in conjunction with
23 that was in 1986, correct?

24 THE WITNESS: For letter routes, yes.

25 COMMISSIONER COVINGTON: For letter routes, all

1 right. And as far as long time variability, I think in
2 looking over the past records and data that was available,
3 does 1985/1986 seem like the cutoff point for that?

4 THE WITNESS: 1985.

5 COMMISSIONER COVINGTON: All right, then let me
6 ask you this then, Witness Baron: If you're using CAT/FAT
7 data and ALTV studies that's that long, wouldn't a person
8 have a tendency to think that the data gain from that would
9 now be considered obsolete?

10 THE WITNESS: Well, we certainly would prefer more
11 up to date data for any type of analysis. We just have to
12 keep in mind, however, that the load time regressions that
13 have been estimated, based on 1985 data, are used solely to
14 produce elasticities which are the percentage increases, the
15 estimates of percentage increases in load time at a stop
16 with respect to a very small percentage increase in volume
17 at the stop.

18 And it's been, I think, the judgment of the Postal
19 Service that the changes that required the development of
20 new street time percentages to substitute for the old 1986
21 percentages, do not necessarily -- do not invalidate these
22 elasticities.

23 And given that that is the sole application of the
24 regressions, it has been determined that as much as we would
25 all like to have up to date data for all of our cost

1 components throughout the CRA, that this is something that
2 we can live with.

3 After all, we're not using the load time equation
4 to predict accrued costs. We're not using it for any
5 operational analysis.

6 Our application is limited to this very specific
7 calculation of essentially marginal costs. The elasticity
8 is the percentage version of marginal cost.

9 COMMISSIONER COVINGTON: So, in other words, you
10 agree that that more current data would probably be helpful,
11 but what you've got is about the best that we can expect at
12 this point in time?

13 THE WITNESS: Correct.

14 COMMISSIONER COVINGTON: All right, through your
15 work with Foster Associates, and with all the stuff that you
16 have done with the carrier, city carrier type issues, is it
17 safe to assume that the number of stops a carrier makes is
18 driven by how much mail he's carrying on the route?

19 THE WITNESS: You mean the actual number of
20 accesses of stops?

21 COMMISSIONER COVINGTON: Right, volume.

22 THE WITNESS: It is determined both by volume and
23 by the number of possible stops.

24 COMMISSIONER COVINGTON: Okay, now, let me ask you
25 this then, Witness Baron: If you and I were going to go out

1 and if we were going to analyze this city carrier who's out
2 on his route, and if he knew that you and I were there to
3 measure his performance, don't you think that some of the
4 results that we get would be biased because employees have a
5 tendency to let you see only what it is they think you're
6 looking for?

7 Or, better still, let me phrase it like this: If
8 we were measuring a person's performance on the route, you
9 know, be it curb, you know, cluster, you know, whatever, and
10 if that employee knew that we were out there, wouldn't you
11 expect them to toe the line a little bit better than some
12 fellow that's just out there all -- you know, any other day
13 with his actions being unmonitored?

14 THE WITNESS: Yes, I am aware of that phenomena
15 and it is a possibility.

16 COMMISSIONER COVINGTON: So it is a distinct
17 possibility, right?

18 THE REPORTER: Is that a yes?

19 THE WITNESS: Yes, I would agree it is a distinct
20 possibility.

21 COMMISSIONER COVINGTON: Okay. I being Witness
22 Baron. I want to get your position on three things that
23 appeared to be a sticky spot back in R97-1 and I want you to
24 equate your opinion from a professional standpoint of view
25 as we would tie it in with R2000-1. Back in R97, there were

1 some allegations, or I guess some thoughts put out that
2 maybe there were some double counts that occurred on the
3 part of the data that was used to analyze city carrier data
4 as far as within stop deliveries. What is your position on
5 that assumption?

6 THE WITNESS: I addressed that issue in some
7 detail in my testimony, and I think, to be very succinct, my
8 view is that there is indeed a coverage effect at a multiple
9 delivery stop that is comparable to what many believe to be
10 a coverage effect across stops on a multiple stop route.

11 In other words, when volume goes up at a multiple
12 delivery stop, load time can go up in two different ways, it
13 can go up because additional volume is being delivered to
14 delivery points that had previously already been getting
15 volume, and, secondly, load can go up independently because
16 the increase in volume has caused the access of new delivery
17 points at that single stop where these particular new
18 delivery points had not previously been accessed. So I
19 think these are two distinct increases in load time and that
20 in counting them both, you are not double-counting, you are
21 simply accounting for this reality.

22 COMMISSIONER COVINGTON: Okay.

23 THE WITNESS: Two distinct affects.

24 COMMISSIONER COVINGTON: All right. And I think
25 the contention was made that elemental load time is deducted

1 from a accrued load time and your position was that the
2 residual effect or any residue left from that should be
3 considered as institutional cost.

4 THE WITNESS: Correct.

5 COMMISSIONER COVINGTON: Okay. So you still
6 maintain that to be a fairly true and accurate statement?

7 THE WITNESS: That is still my view, yes.

8 COMMISSIONER COVINGTON: Okay. And then one last
9 point, with regard to your coverage related load time, I
10 think you said, by definition, that when you look at certain
11 aspects, that it must be completely independently of volume.

12 THE WITNESS: Right.

13 COMMISSIONER COVINGTON: Can you clarify that for
14 me?

15 THE WITNESS: The volume effect in that case is
16 already accounted for by elemental load time. The idea that
17 you need a second distinct cost pool or a time pool to yet
18 further pick up the effect of volume has never made sense to
19 me. I think, logically, what we are trying to pick up here
20 is simply the additional load time that occurs because -- or
21 the additional time at stop, I think would be a better way
22 of putting it, because I don't really call it load time. We
23 actually analyze it as access time. But there is, you know,
24 an additional amount of time that results from going to a
25 new stop, it must be strictly stop related, because the

1 elemental load analysis already accounts for the volume
2 effect.

3 THE REPORTER: Strictly stop related or stock
4 related?

5 THE WITNESS: Stop related. Sorry.

6 COMMISSIONER COVINGTON: Okay. And then one last
7 question, Mr. Baron, and I don't know whether we would need
8 to ask this of you or Mr. Raymond, who is anxiously awaiting
9 his time to sit up on the dias, but, I guess, previously,
10 when all things were considered as it related to city
11 carrier data, I know that detached label and the delivery
12 point sequencing was not a big factor then. But now that
13 they account for such a substantial portion of what is
14 delivered out in the mailstream, how or when, or who is
15 going to make allowances for that?

16 THE WITNESS: I can't really answer that question.

17 COMMISSIONER COVINGTON: Well, you can always save
18 it for Mr. Raymond.

19 THE WITNESS: Well, I just don't know who will be
20 doing what you are suggesting. I simply don't know who that
21 would be. You know, I agree that it would be certainly
22 beneficial to have an analysis that explicitly accounts for
23 DPS.

24 COMMISSIONER COVINGTON: And the detached label?

25 THE WITNESS: Yes. And the 1985 data set

1 obviously does not account for DPS. And, you know, that is
2 undeniably a concern, but it is what we have available, so
3 that is what I have used.

4 COMMISSIONER COVINGTON: Okay. All right. Thank
5 you, Mr. Baron.

6 That is all I have, Mr. Chairman.

7 MR. MCKEEVER: Mr. Chairman.

8 CHAIRMAN GLEIMAN: I think you need puffball.
9 When did you graduate from Grinell?

10 THE WITNESS: Grinell.

11 CHAIRMAN GLEIMAN: Can you remember that far back?

12 THE WITNESS: Yes. In 1972.

13 CHAIRMAN GLEIMAN: I was just wondering if you
14 might have been a classmate of a real good friend of mine,
15 but I have you have a couple of years on him.

16 I do have a question. Earlier on, OCA asked you
17 some questions, it was towards the beginning of Mr.
18 Costich's cross-examination of you, that had to do with
19 elemental load time, coverage related load time and stop
20 effects. And I am just trying to sort out in my own mind,
21 my colleague, Commissioner Omas asked you about carriers
22 walking from door to door fingering the mail, riffling the
23 mail, whatever, and let me ask you the follow-up question to
24 that one, which has to do with mounted routes, I have
25 watched my carrier for years and when he pulls up to my

1 curbside box, he stops the vehicle, he swivels around a
2 little bit and reaches into each of the three trays that he
3 has got to pull out the mail that is going to go into my
4 box. And I am wondering whether that time, based on the
5 discussion that you had earlier on, is stop effects time or
6 is it load time? I took it to be load time, but I just want
7 to make sure I understand correctly.

8 THE WITNESS: Yes. Once the carrier is handling
9 mail related equipment or the mail itself, I would consider
10 that load time.

11 CHAIRMAN GLEIMAN: Okay. And it is coverage
12 related or elemental?

13 THE WITNESS: It is load time that will go up or
14 down as the amount of volume goes up or down, because, after
15 all, you know, the more volume, then eventually the more
16 containers. So it is elemental load time.

17 CHAIRMAN GLEIMAN: Okay. Thank you.

18 Is there any follow-up questions from the bench?

19 MR. McKEEVER: Mr. Chairman, I do not have
20 follow-up, but I did neglect to request that the
21 cross-examination exhibit I used be admitted into evidence
22 and transcribed into the record, and I would like to make
23 that motion now, if that would be appropriate.

24 CHAIRMAN GLEIMAN: Does Postal Service counsel
25 have any objections?

1 MR. COOPER: I believe the witness confirmed that
2 90 percent of the numbers on the page were what he thought
3 they were. I don't know if he confirmed every one.

4 MR. MCKEEVER: Mr. Chairman, I will withdraw the
5 request that it be admitted into evidence, and I will just
6 request that it be transcribed into the record. It is a
7 Postal Service worksheet, so I don't think there is any need
8 for me to have it admitted into evidence at this point. But
9 I do think it would be helpful if it were transcribed in the
10 record.

11 CHAIRMAN GLEIMAN: I will direct that it be
12 transcribed into the record and, given that it is a Postal
13 Service worksheet, I am sure that more than 90 percent of
14 the numbers on there must be correct. If you could provide
15 two copies to the court reporter, I will direct that it be
16 included in the record at the appropriate point.

17 [Cross-Examination Exhibit
18 UPS-XE-BARON-1 was transcribed into
19 evidence.]

20
21
22
23
24
25

UPS-XE-BARON-1

Exhibit 1:
FY98 Volume Estimate of Parcels by Class/Subclass of Mail for each Stop Type - City Regular Letter Routes

CLASS TITLE	SDR		MDR		BAM		TOTAL	
	PARCELS	% of TOTAL	PARCELS	% of TOTAL	PARCELS	% of TOTAL	PARCELS	% of TOTAL
COLUMN NUMBER	[1]		[2]		[3]		[4]	
CALCULATIONS							sum [1] [2] [3]	
UNITS	Pieces (000)		Pieces (000)		Pieces (000)		Pieces (000)	
COLUMN SOURCE/NOTES	R2000-1 USPS-LR-I-16, File CCS-HQ.doc		R2000-1 USPS-LR-I-16, File CCS-HQ.doc		R2000-1 USPS-LR-I-16, File CCS-HQ.doc			
FIRST-CLASS MAIL:								
SINGLE-PIECE LETTERS	101,950	12.47%	35,419	11.98%	54,232	18.70%	191,601	13.65%
PRESORT LETTERS	6,920	0.85%	2,265	0.77%	2,017	0.70%	11,202	0.80%
TOTAL LETTERS	108,870	13.32%	37,684	12.74%	56,249	19.39%	202,803	14.45%
SINGLE-PIECE CARDS	-	0.00%	-	0.00%	-	0.00%	-	0.00%
PRESORT CARDS	-	0.00%	-	0.00%	-	0.00%	-	0.00%
TOTAL CARDS	-	0.00%	-	0.00%	-	0.00%	-	0.00%
TOTAL FIRST-CLASS	108,870	13.32%	37,684	12.74%	56,249	19.39%	202,803	14.45%
PRIORITY MAIL	157,624	19.28%	59,342	20.07%	97,363	33.56%	314,329	22.40%
EXPRESS MAIL	864	0.11%	941	0.32%	880	0.30%	2,685	0.19%
MAILGRAMS	-	0.00%	-	0.00%	-	0.00%	-	0.00%
PERIODICALS:								
IN-COUNTY	3,514	0.43%	1,039	0.35%	1,488	0.51%	6,041	0.43%
OUTSIDE COUNTY:								
REGULAR	27,371	3.35%	8,094	2.74%	11,586	3.99%	47,051	3.35%
NON-PROFIT	8,129	0.99%	2,404	0.81%	3,441	1.19%	13,974	1.00%
CLASSROOM	231	0.03%	68	0.02%	98	0.03%	397	0.03%
TOTAL PERIODICALS	39,246	4.80%	11,605	3.92%	16,612	5.73%	67,463	4.81%
STANDARD A:								
SINGLE PIECE RATE	4,407	0.54%	1,624	0.55%	447	0.15%	6,478	0.46%
COMMERCIAL STANDARD:								
ENHANCED CARR RTE	18,964	2.32%	8,955	3.03%	2,896	1.00%	30,815	2.20%
REGULAR	239,591	29.30%	85,677	28.98%	35,177	12.13%	360,445	25.68%
TOTAL COMMERCIAL	258,555	31.62%	94,632	32.00%	38,073	13.13%	391,260	27.88%
AGGREGATE NONPROFIT:								
NONPROF ENH CARR RTE	126	0.02%	62	0.02%	32	0.01%	220	0.02%
NONPROFIT	12,288	1.50%	4,312	1.46%	1,897	0.65%	18,497	1.32%
TOTAL AGGREG NONPROFIT	12,414	1.52%	4,374	1.48%	1,929	0.66%	18,717	1.33%
TOTAL STANDARD A	275,376	33.88%	100,630	34.03%	40,449	13.94%	416,455	29.68%
STANDARD MAIL (B):								
PARCELS ZONE RATE	102,620	12.55%	34,448	11.65%	26,920	9.28%	163,988	11.69%
BOUND PRINTED MATTER	80,061	9.79%	26,989	9.13%	34,007	11.72%	141,057	10.05%
SPECIAL STANDARD	37,389	4.57%	16,192	5.48%	10,654	3.67%	64,235	4.58%
LIBRARY MAIL	4,920	0.60%	1,708	0.58%	3,301	1.14%	9,929	0.71%
TOTAL STANDARD (B)	224,990	27.52%	79,337	26.83%	74,882	25.81%	379,209	27.02%
US POSTAL SERVICE	251	0.03%	256	0.09%	589	0.20%	1,096	0.08%
FREE MAIL	6,063	0.74%	3,003	1.02%	813	0.28%	9,879	0.70%
INTERNATIONAL MAIL	4,333	0.53%	2,888	0.98%	2,242	0.77%	9,463	0.67%
TOTAL MAIL	817,817	100.00%	295,686	100.00%	290,079	100.00%	1,403,382	100.00%
SPECIAL SERVICES:								
REGISTRY	-	0.00%	-	0.00%	-	0.00%	-	0.00%
CERTIFIED	-	0.00%	-	0.00%	-	0.00%	-	0.00%
INSURANCE	-	0.00%	-	0.00%	-	0.00%	-	0.00%
COD	-	0.00%	-	0.00%	-	0.00%	-	0.00%
SPECIAL DELIVERY	-	0.00%	-	0.00%	-	0.00%	-	0.00%
MONEY ORDERS	-	0.00%	-	0.00%	-	0.00%	-	0.00%
STAMPED ENVELOPES	-	0.00%	-	0.00%	-	0.00%	-	0.00%
SPECIAL HANDLING	-	0.00%	-	0.00%	-	0.00%	-	0.00%
POST OFFICE BOX	-	0.00%	-	0.00%	-	0.00%	-	0.00%
OTHER	-	0.00%	-	0.00%	-	0.00%	-	0.00%
TOTAL SPECIAL SERVICES	-	0.00%	-	0.00%	-	0.00%	-	0.00%
TOTAL VOLUME	817,817	100.00%	295,686	100.00%	290,079	100.00%	1,403,382	100.00%

Note: These estimates are obtained from a survey of city regular letter routes; it excludes SPR activities. USPS-T-3, pp. 13-15; USPS-LR-I-16, p. 2; and USPS-LR-I-300.

1 MR. MCKEEVER: I will do so. Thank you, Mr.
2 Chairman.

3 CHAIRMAN GLEIMAN: Thank you. Follow-up to
4 questions from the bench? Mr. McLaughlin.

5 MR. McLAUGHLIN: Yes. Thank you, Mr. Chairman.

6 CROSS-EXAMINATION

7 MR. McLAUGHLIN:

8 Q Mr. Covington asked -- Commission Covington asked
9 some questions that dealt with carriers being observed and
10 what you would expect in terms of their performance when
11 they are being observed versus when they are not being
12 observed. Are you familiar with the term "route
13 evaluations"?

14 A Yes.

15 Q And a route evaluation is where a carrier is being
16 observed, is he not?

17 A I believe that is part of the process.

18 Q Okay. And, in fact, what is the purpose of a
19 route evaluation?

20 A Well, this is really way outside the scope of my
21 testimony.

22 Q Let me perhaps try to simplify it a little bit.
23 Is it your understanding that the purpose of the route
24 evaluation is at least in part to decide whether or not the
25 route size that has been assigned to the carrier is too

1 large or too small, or just right in terms of the number of
2 addresses he has to serve in order to finish his work within
3 eight hours?

4 A I think that would be fair. I have always looked
5 at it as a method to determine how many routes there should
6 be for the number of delivery points that exist in a
7 particular area.

8 Q Right. Now, are you aware that, for example, if a
9 carrier, in a route evaluation, finishes his route very
10 early, is it possible that that could be taken into account
11 as a decision that the carrier doesn't have a large enough
12 route and he might be assigned more work to do next time
13 after the route evaluation?

14 A I think that would be a possible consideration,
15 yes.

16 Q Do you think that any carriers understand that
17 their performance, when they are being observed, might have
18 an affect on the size of route they will be asked to serve
19 in the future?

20 A It is possible some carriers would react that way.

21 Q Well, I am certainly not suggesting that all
22 carriers take that into account. But you would think that
23 there are some carriers out there that that is not lost upon
24 them when they are being observed?

25 A It is quite possible, yeah.

1 MR. McLAUGHLIN: That is all I have.

2 CHAIRMAN GLEIMAN: Is there any more follow-up?

3 [No response.]

4 CHAIRMAN GLEIMAN: I just want to make, since I
5 invoked my letter carrier's practices, make clear that he is
6 pretty efficient, and I never put the clock on him, and he
7 does a great job delivering my mail. So he is not one of
8 those people that possibly could be, whatever it was you
9 might have been suggesting.

10 In any event, but if there is no additional
11 follow-up to questions from the bench, that brings us to
12 redirect. Mr. Cooper, would you like some time with your
13 witness?

14 MR. COOPER: Yes, sir. There have been quite a
15 number of questions asked. I would like to take 10 minutes.

16 CHAIRMAN GLEIMAN: I think we can manage that.
17 Thank you.

18 [Recess.]

19 CHAIRMAN GLEIMAN: Mr. Cooper, whenever you're
20 ready, you may proceed.

21 MR. COOPER: Mr. Chairman, I have no redirect.

22 CHAIRMAN GLEIMAN: It always makes one wonder
23 whether we haven't done a good enough job asking questions
24 or too good a job asking questions.

25 [Laughter.]

1 CHAIRMAN GLEIMAN: If there is no redirect, Mr.
2 Baron, that completes your testimony here today. We
3 appreciate your appearance and your contributions to the
4 record yet again. We thank you, and you're excused.

5 THE WITNESS: Thank you.

6 [Witness Baron excused.]

7 CHAIRMAN GLEIMAN: Mr. Cooper, when everybody
8 shuffles around, you can introduce your next witness.

9 MR. COOPER: I'll just announce him now and then
10 we'll do the shuffling. The Postal Service calls Lloyd
11 Raymond to the stand.

12 CHAIRMAN GLEIMAN: While we're waiting for the
13 witness to settle in, after checking with everyone, it
14 appears that all the parties have indicated an interest in
15 cross examining, at least those who indicated in advance,
16 are available tomorrow, as is the witness and Postal Service
17 counsel.

18 And I think my colleagues and I are available
19 tomorrow. We'll find out tomorrow morning.

20 So what I would propose is that we proceed with
21 Witness Raymond until 6:00 this evening, give or take a bit.
22 And the give or take has to do with whether there's a
23 logical break point in either someone's cross examination or
24 between cross examinations by particular intervenors.

25 And we'll be flexible with that and take into

1 account, the wishes of whoever is up there doing the cross
2 examining at the point in time. I don't want to rush anyone
3 to finish or to cut them off in the middle, so we'll be a
4 little bit flexible about our target time for this evening.
5 It will be about 6:00 p.m., and then we'll reconvene
6 tomorrow morning at the usual hour, which is 9:30 and we'll
7 finish up with Witness Raymond, if we have not done so by
8 6:00 tonight, including the holding of any closed session
9 that we may need to hold. That will also be put over until
10 tomorrow morning.

11 Whereupon,

12 LLOYD RAYMOND,

13 a witness, having been called for examination, and, having
14 been first duly sworn, was examined and testified as
15 follows:

16 DIRECT EXAMINATION

17 BY MR. COOPER:

18 Q Mr. Raymond, I am handing you copies of a document
19 entitled Direct Testimony of Lloyd Raymond on Behalf of the
20 United States Postal Service, marked for identification as
21 USPS-T-13.

22 [Pause.]

23 Are you familiar with this document?

24 A Yes, I am.

25 Q Was it prepared by you or under your direct

1 supervision?

2 A Yes, it was.

3 Q If you were to be testifying orally today on those
4 matters, would that be the testimony that you would give?

5 A Yes, it is.

6 MR. COOPER: Mr. Chairman, I will hand the two
7 copies to the Reporter and ask that they be entered into
8 evidence.

9 CHAIRMAN GLEIMAN: Recognizing that there are some
10 pending motions associated with this gentleman's testimony,
11 is there any objection to it being introduced at this point?

12 MR. McLAUGHLIN: Yes, Mr. Chairman. Tom
13 McLaughlin. I have been advised over the lunch hour that
14 I'm now authorized to speak not only on behalf of Advo, but
15 also MPA and the publisher parties.

16 We do object to the introduction into evidence of
17 this testimony, subject to a motion to strike, and the other
18 discussion we had earlier today.

19 So, we would request that if it be received, it be
20 received on that basis, subject to a motion to strike.

21 CHAIRMAN GLEIMAN: I appreciate that there is an
22 outstanding motion to strike, and also that we're going to
23 reserve judgment until we determine whether sufficient and
24 complete responses have been received by the parties to the
25 motion.

1 strike does not follow the line to the Library Reference in
2 question; that there is no objection with respect to the
3 Library Reference?

4 There's a Category II Library Reference that the
5 witness is sponsoring that's being entered into evidence at
6 this point, perhaps, and the question arises in my mind,
7 inasmuch as there is a motion to strike testimony, whether
8 parties wish to reserve any rights at this point with
9 respect to the Library Reference, which, in effect, is
10 incorporated by reference into his testimony.

11 And I just want to make sure that we don't
12 foreclose anybody's options at this point.

13 MR. McLAUGHLIN: Your Honor, I frankly hadn't
14 thought of it in quite those terms that you just presented
15 it. Obviously, in terms of a motion to strike that would
16 delineate exactly the scope of the motion, I am assuming
17 that it would include that Library Reference, and we're
18 certainly -- I don't believe there was any intention to
19 exclude that from that issue.

20 CHAIRMAN GLEIMAN: All right, then, we will enter
21 the Library Reference in question into evidence, subject the
22 same motions and stipulations that are outstanding with
23 respect to Witness Raymond's testimony, so that all rights
24 of the parties are reserved in that regard.

25 [Library Reference I-163 was

1 provisionally received into
2 evidence, subject to pending
3 stipulations and motions to
4 strike.]

5 CHAIRMAN GLEIMAN: Mr. Raymond, have you had an
6 opportunity to examine the packet of Designated Written
7 Cross Examination that was made available earlier today?

8 THE WITNESS: Yes, I have, sir.

9 CHAIRMAN GLEIMAN: And if those questions were
10 asked of you today, would your answers be the same as those
11 you previously provided in writing?

12 THE WITNESS: There are a couple of modifications
13 that I would like to have made to those records, if I could,
14 please.

15 CHAIRMAN GLEIMAN: If you could list those, we'd
16 appreciate it.

17 THE WITNESS: Advo Number 50, Part (h), and it
18 will be on the second part of Part (h) at the top. I have
19 845 route days, and that should be 844 route days.

20 And then Advo-66, Part (d), same modification. I
21 have 845 and it should be 844 route days, and I have made
22 the corrections to the records.

23 CHAIRMAN GLEIMAN: And those are the only
24 corrections?

25 THE WITNESS: Yes, sir.

1 CHAIRMAN GLEIMAN: Inasmuch as the corrections
2 have been incorporated into the packet, counsel, if you
3 could please provide the packet of corrected Designated
4 Written Cross Examination to the Reporter, I'll direct that
5 the material be received into evidence and transcribed into
6 the record at this point.

7 [Designated Written Cross
8 Examination of Lloyd Raymond was
9 received into evidence and
10 transcribed into the record.]

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

DESIGNATION OF WRITTEN CROSS-EXAMINATION
OF UNITED STATES POSTAL SERVICE
WITNESS LLOYD RAYMOND
(USPS-T-13)

Party

Advo, Inc. and
Magazine Publishers of America

Interrogatories

ADVO/USPS-T13-1-22, 23b, 24-37, 39-50, 52, 56,
58, 60-68, 70-78, 80-87, 89-93, 98-100

MPA/USPS-T13-1-5, 8-9, 11, 13, 15-16, 18, 20-33,
35-44, 48-49, 51-55, 57-109

OCA/USPS-T13-1-7, 8a-c

UPS/USPS-T13-1-5, 7a-c, 8-9, 12

POIR No. 8

Newspaper Association of America

ADVO/USPS-T13-1, 7, 10-13, 15, 17, 19-22, 23b,
74, 77, 80-85, 87, 89-96, 98-100

MPA/USPS-T13-1, 8-9, 11, 13, 15, 18, 20-25,
28-44, 49, 51-54, 57, 64-65, 67-68, 70, 79, 82,
95-97, 100, 102-105

NAA/USPS-T13-1-7

OCA/USPS-T13-1, 4-5

UPS/USPS-T13-2, 7a-c, 8-9

POIR No. 8

Office of the Consumer Advocate

ADVO/USPS-T13-11, 13-16, 23b, 25-27, 29-33,
35-37, 39

MPA/USPS-T13-15-16

NAA/USPS-T13-3-6

OCA/USPS-T13-1-6

United Parcel Service

ADVO/USPS-T13-1, 20-21, 42-43, 50, 58, 77, 81,
85-86, 90, 92, 94-95, 98, 100

MPA/USPS-T13-8-9, 22, 52, 67, 75, 100, 102

NAA/USPS-T13-3-4

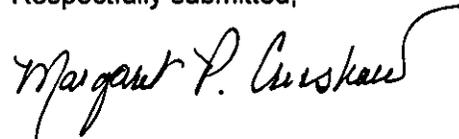
OCA/USPS-T13-8a-c

UPS/USPS-T13-3-5, 9-14

UPS/USPS-T11-25 redirected to T13

POIR No. 8

Respectfully submitted,



Margaret P. Crenshaw

INTERROGATORY RESPONSES OF
UNITED STATES POSTAL SERVICE
WITNESS LLOYD RAYMOND (T-13)
DESIGNATED AS WRITTEN CROSS-EXAMINATION

Interrogatory:

ADVO/USPS-T13-1
ADVO/USPS-T13-2
ADVO/USPS-T13-3
ADVO/USPS-T13-4
ADVO/USPS-T13-5
ADVO/USPS-T13-6
ADVO/USPS-T13-7
ADVO/USPS-T13-8
ADVO/USPS-T13-9
ADVO/USPS-T13-10
ADVO/USPS-T13-11
ADVO/USPS-T13-12
ADVO/USPS-T13-13
ADVO/USPS-T13-14
ADVO/USPS-T13-15
ADVO/USPS-T13-16
ADVO/USPS-T13-17
ADVO/USPS-T13-18
ADVO/USPS-T13-19
ADVO/USPS-T13-20
ADVO/USPS-T13-21
ADVO/USPS-T13-22
ADVO/USPS-T13-23b
ADVO/USPS-T13-24
ADVO/USPS-T13-25
ADVO/USPS-T13-26
ADVO/USPS-T13-27
ADVO/USPS-T13-28
ADVO/USPS-T13-29
ADVO/USPS-T13-30
ADVO/USPS-T13-31
ADVO/USPS-T13-32
ADVO/USPS-T13-33

Designating Parties:

Advo&MPA, NAA, UPS
Advo&MPA
Advo&MPA
Advo&MPA
Advo&MPA
Advo&MPA
Advo&MPA, NAA
Advo&MPA
Advo&MPA
Advo&MPA, NAA
Advo&MPA, NAA, OCA
Advo&MPA, NAA
Advo&MPA, NAA, OCA
Advo&MPA, OCA
Advo&MPA, NAA, OCA
Advo&MPA, OCA
Advo&MPA, NAA
Advo&MPA
Advo&MPA, NAA
Advo&MPA, NAA, UPS
Advo&MPA, NAA, UPS
Advo&MPA, NAA
Advo&MPA, NAA, OCA
Advo&MPA
Advo&MPA, OCA
Advo&MPA, OCA
Advo&MPA, OCA
Advo&MPA
Advo&MPA, OCA
Advo&MPA, OCA
Advo&MPA, OCA
Advo&MPA, OCA
Advo&MPA, OCA

ADVO/USPS-T13-34	Advo&MPA
ADVO/USPS-T13-35	Advo&MPA, OCA
ADVO/USPS-T13-36	Advo&MPA, OCA
ADVO/USPS-T13-37	Advo&MPA, OCA
ADVO/USPS-T13-39	Advo&MPA, OCA
ADVO/USPS-T13-40	Advo&MPA
ADVO/USPS-T13-41	Advo&MPA
ADVO/USPS-T13-42	Advo&MPA, UPS
ADVO/USPS-T13-43	Advo&MPA, UPS
ADVO/USPS-T13-44	Advo&MPA
ADVO/USPS-T13-45	Advo&MPA
ADVO/USPS-T13-46	Advo&MPA
ADVO/USPS-T13-47	Advo&MPA
ADVO/USPS-T13-48	Advo&MPA
ADVO/USPS-T13-49	Advo&MPA
ADVO/USPS-T13-50	Advo&MPA, UPS
ADVO/USPS-T13-52	Advo&MPA
ADVO/USPS-T13-56	Advo&MPA
ADVO/USPS-T13-58	Advo&MPA, UPS
ADVO/USPS-T13-60	Advo&MPA
ADVO/USPS-T13-61	Advo&MPA
ADVO/USPS-T13-62	Advo&MPA
ADVO/USPS-T13-63	Advo&MPA
ADVO/USPS-T13-64	Advo&MPA
ADVO/USPS-T13-65	Advo&MPA
ADVO/USPS-T13-66	Advo&MPA
ADVO/USPS-T13-67	Advo&MPA
ADVO/USPS-T13-68	Advo&MPA
ADVO/USPS-T13-70	Advo&MPA
ADVO/USPS-T13-71	Advo&MPA
ADVO/USPS-T13-72	Advo&MPA
ADVO/USPS-T13-73	Advo&MPA
ADVO/USPS-T13-74	Advo&MPA, NAA
ADVO/USPS-T13-75	Advo&MPA
ADVO/USPS-T13-76	Advo&MPA
ADVO/USPS-T13-77	Advo&MPA, NAA, UPS
ADVO/USPS-T13-78	Advo&MPA
ADVO/USPS-T13-80	Advo&MPA, NAA
ADVO/USPS-T13-81	Advo&MPA, NAA, UPS

ADVO/USPS-T13-82	Advo&MPA, NAA
ADVO/USPS-T13-83	Advo&MPA, NAA
ADVO/USPS-T13-84	Advo&MPA, NAA
ADVO/USPS-T13-85	Advo&MPA, NAA, UPS
ADVO/USPS-T13-86	Advo&MPA, UPS
ADVO/USPS-T13-87	Advo&MPA, NAA
ADVO/USPS-T13-89	Advo&MPA, NAA
ADVO/USPS-T13-90	Advo&MPA, NAA, UPS
ADVO/USPS-T13-91	Advo&MPA, NAA
ADVO/USPS-T13-92	Advo&MPA, NAA, UPS
ADVO/USPS-T13-93	Advo&MPA, NAA
ADVO/USPS-T13-94	NAA, UPS
ADVO/USPS-T13-95	NAA, UPS
ADVO/USPS-T13-96	NAA
ADVO/USPS-T13-98	Advo&MPA, NAA, UPS
ADVO/USPS-T13-99	Advo&MPA, NAA
ADVO/USPS-T13-100	Advo&MPA, NAA, UPS
MPA/USPS-T13-1	Advo&MPA, NAA
MPA/USPS-T13-2	Advo&MPA
MPA/USPS-T13-3	Advo&MPA
MPA/USPS-T13-4	Advo&MPA
MPA/USPS-T13-5	Advo&MPA
MPA/USPS-T13-8	Advo&MPA, NAA, UPS
MPA/USPS-T13-9	Advo&MPA, NAA, UPS
MPA/USPS-T13-11	Advo&MPA, NAA
MPA/USPS-T13-13	Advo&MPA, NAA
MPA/USPS-T13-15	Advo&MPA, NAA, OCA
MPA/USPS-T13-16	Advo&MPA, OCA
MPA/USPS-T13-18	Advo&MPA, NAA
MPA/USPS-T13-20	Advo&MPA, NAA
MPA/USPS-T13-21	Advo&MPA, NAA
MPA/USPS-T13-22	Advo&MPA, NAA, UPS
MPA/USPS-T13-23	Advo&MPA, NAA
MPA/USPS-T13-24	Advo&MPA, NAA
MPA/USPS-T13-25	Advo&MPA, NAA
MPA/USPS-T13-26	Advo&MPA
MPA/USPS-T13-27	Advo&MPA
MPA/USPS-T13-28	Advo&MPA, NAA
MPA/USPS-T13-29	Advo&MPA, NAA

MPA/USPS-T13-30	Advo&MPA, NAA
MPA/USPS-T13-31	Advo&MPA, NAA
MPA/USPS-T13-32	Advo&MPA, NAA
MPA/USPS-T13-33	Advo&MPA, NAA
MPA/USPS-T13-34	NAA
MPA/USPS-T13-35	Advo&MPA, NAA
MPA/USPS-T13-36	Advo&MPA, NAA
MPA/USPS-T13-37	Advo&MPA, NAA
MPA/USPS-T13-38	Advo&MPA, NAA
MPA/USPS-T13-39	Advo&MPA, NAA
MPA/USPS-T13-40	Advo&MPA, NAA
MPA/USPS-T13-41	Advo&MPA, NAA
MPA/USPS-T13-42	Advo&MPA, NAA
MPA/USPS-T13-43	Advo&MPA, NAA
MPA/USPS-T13-44	Advo&MPA, NAA
MPA/USPS-T13-48	Advo&MPA
MPA/USPS-T13-49	Advo&MPA, NAA
MPA/USPS-T13-51	Advo&MPA, NAA
MPA/USPS-T13-52	Advo&MPA, NAA, UPS
MPA/USPS-T13-53	Advo&MPA, NAA
MPA/USPS-T13-54	Advo&MPA, NAA
MPA/USPS-T13-55	Advo&MPA
MPA/USPS-T13-57	Advo&MPA, NAA
MPA/USPS-T13-58	Advo&MPA
MPA/USPS-T13-59	Advo&MPA
MPA/USPS-T13-60	Advo&MPA
MPA/USPS-T13-61	Advo&MPA
MPA/USPS-T13-62	Advo&MPA
MPA/USPS-T13-63	Advo&MPA
MPA/USPS-T13-64	Advo&MPA, NAA
MPA/USPS-T13-65	Advo&MPA, NAA
MPA/USPS-T13-66	Advo&MPA
MPA/USPS-T13-67	Advo&MPA, NAA, UPS
MPA/USPS-T13-68	Advo&MPA, NAA
MPA/USPS-T13-69	Advo&MPA
MPA/USPS-T13-70	Advo&MPA, NAA
MPA/USPS-T13-71	Advo&MPA
MPA/USPS-T13-72	Advo&MPA
MPA/USPS-T13-73	Advo&MPA

MPA/USPS-T13-74	Advo&MPA
MPA/USPS-T13-75	Advo&MPA, UPS
MPA/USPS-T13-76	Advo&MPA
MPA/USPS-T13-77	Advo&MPA
MPA/USPS-T13-78	Advo&MPA
MPA/USPS-T13-79	Advo&MPA, NAA
MPA/USPS-T13-80	Advo&MPA
MPA/USPS-T13-81	Advo&MPA
MPA/USPS-T13-82	Advo&MPA, NAA
MPA/USPS-T13-83	Advo&MPA
MPA/USPS-T13-84	Advo&MPA
MPA/USPS-T13-85	Advo&MPA
MPA/USPS-T13-86	Advo&MPA
MPA/USPS-T13-87	Advo&MPA
MPA/USPS-T13-88	Advo&MPA
MPA/USPS-T13-89	Advo&MPA
MPA/USPS-T13-90	Advo&MPA
MPA/USPS-T13-91	Advo&MPA
MPA/USPS-T13-92	Advo&MPA
MPA/USPS-T13-93	Advo&MPA
MPA/USPS-T13-94	Advo&MPA
MPA/USPS-T13-95	Advo&MPA, NAA
MPA/USPS-T13-96	Advo&MPA, NAA
MPA/USPS-T13-97	Advo&MPA, NAA
MPA/USPS-T13-98	Advo&MPA
MPA/USPS-T13-99	Advo&MPA
MPA/USPS-T13-100	Advo&MPA, NAA, UPS
MPA/USPS-T13-101	Advo&MPA
MPA/USPS-T13-102	Advo&MPA, NAA, UPS
MPA/USPS-T13-103	Advo&MPA, NAA
MPA/USPS-T13-104	Advo&MPA, NAA
MPA/USPS-T13-105	Advo&MPA, NAA
MPA/USPS-T13-106	Advo&MPA
MPA/USPS-T13-107	Advo&MPA
MPA/USPS-T13-108	Advo&MPA
MPA/USPS-T13-109	Advo&MPA
NAA/USPS-T13-1	NAA
NAA/USPS-T13-2	NAA
NAA/USPS-T13-3	NAA, OCA, UPS

NAA/USPS-T13-4	NAA, OCA, UPS
NAA/USPS-T13-5	NAA, OCA
NAA/USPS-T13-6	NAA, OCA
NAA/USPS-T13-7	NAA
OCA/USPS-T13-1	Advo&MPA, NAA, OCA
OCA/USPS-T13-2	Advo&MPA, OCA
OCA/USPS-T13-3	Advo&MPA, OCA
OCA/USPS-T13-4	Advo&MPA, NAA, OCA
OCA/USPS-T13-5	Advo&MPA, NAA, OCA
OCA/USPS-T13-6	Advo&MPA, OCA
OCA/USPS-T13-7	Advo&MPA
OCA/USPS-T13-8a	Advo&MPA, UPS
OCA/USPS-T13-8b	Advo&MPA, UPS
OCA/USPS-T13-8c	Advo&MPA, UPS
UPS/USPS-T13-1	Advo&MPA
UPS/USPS-T13-2	Advo&MPA, NAA
UPS/USPS-T13-3	Advo&MPA, UPS
UPS/USPS-T13-4	Advo&MPA, UPS
UPS/USPS-T13-5	Advo&MPA, UPS
UPS/USPS-T13-7a	Advo&MPA, NAA
UPS/USPS-T13-7b	Advo&MPA, NAA
UPS/USPS-T13-7c	Advo&MPA, NAA
UPS/USPS-T13-8	Advo&MPA, NAA
UPS/USPS-T13-9	Advo&MPA, NAA, UPS
UPS/USPS-T13-10	UPS
UPS/USPS-T13-11	UPS
UPS/USPS-T13-12	Advo&MPA, UPS
UPS/USPS-T13-13	UPS
UPS/USPS-T13-14	UPS
UPS/USPS-T11-25 redirected to T13	UPS
POIR No. 8	Advo&MPA, NAA, UPS

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

ADVO/USPS-T13-1. On page 5 of your testimony, you state:

"The objective of the Engineered Standards was to collect actual activities of the city letter carrier and to develop engineered methods and time standards to establish a workload managing system. The data collected needed to be comprehensive in order to support in-depth analysis and validation of work methods."

(a) From the data presented in your testimony, were engineered methods and time standards developed to establish a workload managing system? Please explain and describe how the data were used in these capacities.

(b) Were the data presented in your testimony used to support any in-depth analyses or validations of work methods? Please explain and describe how the data were used in these capacities.

RESPONSE:

(a) Yes, the data presented in my testimony was one of many components used to develop the engineered methods and time standards, and workload managing system. The data presented us with a percent time distribution picture of a day in the life of a carrier. The variability of the distribution assisted us in determining the structure of the standards, areas of focus for method improvements, and a design concept for the workload managing system.

(b) The data was not used for in-depth analysis or validations of work methods. The data presented us with a percent time distribution picture of a day in the life of a carrier. The variability of the distribution assisted us in determining the structure of the standards, areas of focus for method improvements, and a design concept for the workload managing system.

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

ADVO/USPS-T13-2. With respect to the specific project which generated the data presented in your testimony, please provide the following:

- (a) A full description of your original work plan proposed to the USPS for each contract you performed on this specific project.
- (b) The statement of work and list of deliverables for each contract you performed on this specific project.
- (c) List of reports, analyses, and all other documentation you prepared on each contract you performed on this specific project.
- (d) Contract initiation and completion dates for each contract you performed on this specific project.

RESPONSE:

(a-d) Library Reference USPS LR-I-252, to be filed shortly, includes:

1. the requested work plans with statements of work and lists of deliverables,
2. a list of reports, analysis, and other documentation; and
3. the contract dates.

Note that Line items 490 through 524 on pages 278 through 283 are file boxes of route adjustment information for the Engineered Standards Test sites, and not binders (as incorrectly indicated on the list).

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

ADVO/USPS-T13-3. With respect to specific project which generated the data presented in your testimony, please provide all USPS written guidance and describe all discussions with the USPS concerning

- (a) the selection of specific locations and routes for observation.
- (b) the observation approach, activities to be recorded, and the criteria for the data collection for this project.
- (c) data processing and quality assurance procedures.

RESPONSE:

(a) I did not receive any written guidance for the selection of the specific locations or routes from the Postal Service. In my discussions with USPS the approach agreed on was to let the ten regions pick the sites and we would use Excel® generated random numbers to pick the routes at the site. Also we would pick some sites at random and at these sites once again pick the routes at random.

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

ADVO/USPS-T13-4. What documentation did you review or assess on either sites, locations or routes prior to the selection process?

RESPONSE:

None.

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

ADVO/USPS-T13-5. What documentation did you review or assess on either sites, locations or routes once the sites/locations were selected?

RESPONSE:

None.

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

ADVO/USPS-T13-6. Were any of the data included within your project data (the Engineered Standards/Delivery Redesign project, described on page 3 of your testimony) collected by USPS employees or other contractors (rather than your own organization)? If so, please:

- (a) Identify and describe such data.
- (b) Identify the types of USPS employees/contractors that provided the data.
- (c) Describe how you validated that data.

RESPONSE:

(a) All data was collected by either employees and contractors from other companies or contractors that were hired by my organization. USPS employees did not collect the data using the bar code process.

(b) The contractors or employees of other companies came from a broad section of career experience and educational levels.

(c) In Phase 1, the USPS Subject Matter Experts that were involved in the design of the data to be collected rotated between collection teams observing the collection process. In Phase 2, the USPS Subject Matter Expert, along with three Phase 1 data collectors rotated between teams observing the collection process. Also, the reports from the field were reviewed for logical scans by comparison to other data being collected and reports.

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

ADVO/USPS-T13-7. On page 14 of your testimony, you state that during Phase 1, 106 routes were observed at 32 locations.

(a) Please identify the 32 locations in Phase 1 and identify the USPS Regions in which they are located.

(b) Which locations were chosen by USPS Region personnel which were chosen by the random-number selection?

(c) Were there any locations initially chosen by either USPS Region personnel or the random-number selection that ultimately were not observed? If so, please provide the number of such locations and explain why they were not observed.

(d) Were there any routes initially chosen by the random-number selection that were not observed? If so, please provide the number of such locations and explain why they were not observed.

(e) Were any observed routes chosen by other than the random-number selection process? If so, please identify them and explain why they were chosen.

RESPONSE:

(a-b) A location contained one or more ZIP Codes.

Phase 1

CY02	Allegheny	Region
CY03	Allegheny	Region
CY04	Allegheny	Region
CY05	Southwest	Region
CY06	Southwest	Region
CY07	Southwest	Region
CY08	Southeast	Region
CY09	Southeast	Region
CY10	Southeast	Region
CY11	Pacific	Region
CY14	Western	Region
CY15	Western	Region
CY16	Western	Region
CY17	NY Metro	Region
CY18	NY Metro	Region
CY19	NY Metro	Region
CY20	Mid Atlantic	Region

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

CY21	Mid Atlantic	Region
CY22	Mid Atlantic	Region
CY23	Northeast	Region
CY26	Mid West	Region
CY27	Mid West	Region
CY28	Mid West	Region
CY29	Great Lakes	Region
CY30	Great Lakes	Region
CY31	Great Lakes	Region
CY32	Northeast	Random
CY33	Northeast	Random
CY34	NY Metro	Random
CY35	Southwest	Random
CY36	Great Lakes	Random
CY37	Great Lakes	Random
CY38	Allegheny	Random
CY39	Midwest	Random
CY40	Great Lakes	Random
CY41	Great Lakes	Region
CY42	NY Metro	Region
CY43	NY Metro	Region
CY44	Southeast	Region
CY45	Southeast	Region

(c) I did not keep any records on locations we did not visit.

(d) As far as I know we observed all routes that were picked at random. The team picked the routes daily.

(e) All routes were chosen using the random number process.

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

ADVO/USPS-T I3-8. You state that Engineering sent requests to the ten geographic USPS Regions asking that each Region select 3 to 5 sites (zip codes). Please provide a copy of those requests, and any other guidance that was provided to the Regions, with respect to making choices of sites. If any of the guidance was oral in nature, please also describe it.

RESPONSE:

The following is a copy of the email sent to the Regions by the USPS.

Reply Separator

Subject: Re: Delivery Methods & Standards
Author: [REDACTED] at CSIL001L
Date: 7/30/96 2:17 PM

Great Lakes Area submits the [REDACTED] post office in the [REDACTED]

Reply Separator

Subject: Delivery Methods & Standards
Author: [REDACTED] at ERDHQDSS
Date: 7/22/96 12:34 PM

Gentlemen,

Engineering has contracted with [REDACTED] for the development of engineered City Carrier methods and standards. Our customer is Operations Redesign, who was tasked by [REDACTED] Headquarters Delivery, Labor Relations, and Operations Redesign is being keep informed of all activities by Engineering and the contractor team.

We need ten cities, one in each Area, where up to three delivery units per city could be used to collect data. The units should have a high DPS volume. There must be a mixture of routes, mounted, park and loop, business and residential. No Rural Carriers are to be observed.

The team will be there four weeks, starting October 7 with some starting as late as January 6. We would like to visit, not to collect data, a few times before that. Six to eight full time people with occasional visitors are expected to be used. They will have a hand held device which be used for the time study data collection. It looks like a pocket calculator. There will also be clipboards/note pads to record on.

We have asked [REDACTED] to assist at the selection of units to use. We are seeking your permission and selection of units to study. The Delivery Perfect team has asked that we not use any units with the same NALC local as their test sites. Any visit to a unit would be coordinated through you.

Forwarded with Changes

From: [REDACTED] at [REDACTED]
Date: 10/9/96 12:15PM
To: [REDACTED] at [REDACTED]
*cc: [REDACTED] at [REDACTED]
*cc: [REDACTED] at [REDACTED]

Subject: Re[3]: Delivery Methods & Standards

Forwarded with Changes

From: [REDACTED] at [REDACTED]
Date: 8/1/96 8:12AM

Subj: Re: Delivery Methods & Standards
 Date: 2/25/00 3:45:26 PM Eastern Standard Time
 From: [REDACTED]@email.usps.gov
 To: [REDACTED] (RPM12901)

Pacific Area's response.

Dick

Forward Header

Subject: Re: Delivery Methods & Standards
 Author: [REDACTED]@SBCA002L
 Date: 8/20/96 2:38 PM

As my secretary [REDACTED], relayed to you on August 15, the [REDACTED]
 has been designated as the location to select test sites for the Delivery
 Methods and Engineered Standards project. The [REDACTED] has selected
 [REDACTED] for the testing as that city matches your selection criteria. The
 [REDACTED] contact is [REDACTED] and he can be reached at [REDACTED].
 [REDACTED] If you need any further assistance, please let me know.

Reply Separator

Subject: Delivery Methods & Standards
 Author: [REDACTED]@ERDHQDSS
 Date: 8/15/96 9:36 AM

We had hoped that each Area would participate in the Delivery Methods
 & Engineered Standards project. It is not mandatory. We simply felt
 that the buy-in from the Areas and the NALC would be better if all
 Areas were involved. The NALC has been notified and is invited. We
 will be going to our first Experimental Site by the 9/3. This site
 will be used to determine how we will collect data at the other sites.
 I had sent two messages asking for test sites in your Areas. Please
 consider involvement in this project.

First message 7/22/96

Gentlemen,

Engineering has contracted with [REDACTED] for the
 development of engineered City Carrier methods and standards. Our
 customer is Operations Redesign, who was tasked by [REDACTED]
 Headquarters Delivery, Labor Relations, and Operations Redesign is
 being keep informed of all activities by Engineering and the
 contractor team.

loop, business and residential. No Rural Carriers are to be observed.

The team will be there four weeks, starting October 7 with some starting as late as January 6. We would like to visit, not to collect data, a few times before that. Six to eight full time people with occasional visitors are expected to be used. They will have a hand held device which be used for the time study data collection. It looks like a pocket calculator. There will also be clipboards/note pads to record on.

We have asked [redacted] to assist at the selection of units to use. We are seeking your permission and selection of units to study. The Delivery Perfect team has asked that we not use any units with the same NALC local as their test sites. Any visit to a unit would be coordinated through you.

Follow up message 8/5/96

Thank you for your responses to the request for data collection sites for the Delivery Methods & Standards Study. We have received responses from 8 of the 10 areas.

The suggested locations from the Areas are:

Allegheny Area: [redacted]

Great Lakes Area: [redacted]

Mid-Atlantic Area: [redacted]

Mid-West Area: [redacted]

New York Metro Area: [redacted]

Northeast Area: No information yet

Pacific Area: No information yet

Southeast Area: [redacted]

Southwest Area: [redacted]

Western Area: [redacted]

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

ADVO/USPS-T13-9. On page 14 of your testimony, you state that 234 routes were observed at 22 locations during Phase 2. On page 6 you state that ten "sites" were selected as potential implementation test sites, which Delivery Redesign reduced to five implementation test-sites. On page 9 (footnote 8) you also state that two sites from Phase 1 were also observed. Please identify the number of sites/locations in Phase 2 that were chosen from

- (a) the Phase 2 requests to the ten geographic Regions,
- (b) the Phase 1 requests, and
- (c) the Phase 1 "random" selection.

RESPONSE:

(a-c) Also see to ADVO/USPS-T13-7

Phase 2

CY02 and CY04 were also studied in Phase 2.

CY46	Western	Region
CY47	Western	Region
CY48	Midwest	Region
CY49	Southeast	Region
CY50	Pacific	Region
CY51	Pacific	Region
CY52	Pacific	Region
CY53	Pacific	Region
CY54	Southeast	Random
CY55	Southeast	Region
CY56	Southeast	Region
CY57	Mid Atlantic	Region
CY58	Mid Atlantic	Region
CY59	DC Metro	Region
CY60	Southwest	Region
CY61	Southwest	Region
CY62	Southwest	Region
CY63	Mid Atlantic	Region
CY64	Midwest	Region
CY65	Southeast	Region
CY66	Pacific	Random

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

ADVO/USPS-T13-10. For the Phase 2 locations,

(a) Please identify the 21 locations in Phase 2 and identify the USPS Regions in which they are located.

(b) Which locations were chosen by the Regions and which were chosen by the random-number selection?

(c) Were there any locations initially chosen by either the Regions or the random-number selection that were not observed? If so, please quantify and explain why.

(d) Were there any routes initially chosen by the random-number selection that were not observed? If so, please explain why they were not observed.

(e) Were any observed routes chosen by other than the random-number selection process? If so, please identify them and explain why they were chosen.

RESPONSE:

(a-b)

Phase 2

CY02 and CY04 were also studied in Phase 2.

CY46	Western	Region
CY47	Western	Region
CY48	Midwest	Region
CY49	Southcast	Region
CY50	Pacific	Region
CY51	Pacific	Region
CY52	Pacific	Region
CY53	Pacific	Region
CY54	Southeast	Random
CY55	Southeast	Region
CY56	Southeast	Region
CY57	Mid Atlantic	Region
CY58	Mid Atlantic	Region
CY59	DC Metro	Region
CY60	Southwest	Region
CY61	Southwest	Region
CY62	Southwest	Region
CY63	Mid Atlantic	Region

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

CY64	Midwest	Region
CY65	Southeast	Region
CY66	Pacific	Random

(c) I did not keep any records on locations we did not visit. Resource availability was the reason we did not observe all sites.

(d) As far as I know, we observed all routes that were picked at random. The teams picked the routes daily.

(e) All routes were chosen using the random number process.

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

ADVO/USPS-T13-11. On page 6 of your testimony, you state that it was determined that two-person teams would be required to collect the work sampling data.

- (a) Please explain why two data collectors were required to sample each route-day.
- (b) Please describe what each data collector did during the data collection process.
- (c) Please identify any route-day where there was only one data collector.
- (d) Please identify any route-day where there were more than two data collectors.

RESPONSE:

- (a) One would drive the car and the other would scan and collect data.
- (b) The team would arrive ½ to 1 hour before the start of the route. They would observe the case and if there had been any PM casing from the previous day then they were to count and record the cased volume. In addition, they would check the DPS end-of-run report, count, measure and weigh mail for the route, and count the paces from/to the various locations the carrier would travel in the office.

They would also check with their supervisor to determine which carrier/s would be carrying the route that day, and observe the carrier upon arrival to determine if any activities began pre-clock in. Typically, they would start the work sampling and time studies at clock-in. Every six minutes when the scanner beep went off the observers typically performed the work sampling. They would take time studies of the various inside activities counting the appropriate items such as number of letters cased, flats cased, bends, paces taken during the in office

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

time. They would videotape the case layout and inside activities for approximately ½ hour. The video would be shot at various times throughout the in-office time.

If possible, they would obtain quantitative data: temperature, humidity, carrier – age, height, weight, left or right handed, gender, out-seam, bundle method, smoker/non-smoker, length of reach.

They would follow the carrier throughout the day doing the work sampling, time study, and videotaping. They would switch from collecting inside data to outside data as the carrier clocked to the street or as the carrier cleared the office to load the vehicle.

They would enter starting odometer reading and collect additional quantitative data on the street portion of the day such as: the empty satchel weight, loaded satchel weights at the beginning of a loop, temperature, humidity, wind, rain, snow, hail.

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

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

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 videotape outside activities for approximately ½ hour. The video would be shot at various times throughout the street time.

Upon return to the unit, they would continue the work sampling, time study, videotaping and recording of quantitative data. They would switch from street activities to Inside-Office when the carrier clocked off the street and/or as the carrier passed the time clock.

Breaks were accommodated by the other team member performing the data collection tasks. Typically, time study and videotaping would be temporarily interrupted and only work sampling would continue during break times. If necessary, the data collectors could use the Observer Personal scan sequence if they had to be away from the carrier.

I do not know how often team members traded activities.

Upon completion of the data collection on the route, the team would return to their hotel. They would print out reports, scan for abnormalities, consult their Daily Comments Log, and mark up the reports in red with their recommended changes. After the review process they would make phone contact with the

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

central location, discuss any issues, make arrangements to upload the data collected to a central database, and upload the data. Next, they would make copies of the reports, and place original marked up reports and videotape along with any other documents in a priority mailer for mailing to the central location the next morning.

Which team member performed which activities, how often they switched, and how they supported each other was left up to team.

(c-d) I am not aware of any cases where only one data collector went out on a route. We did not keep records as to the number of collectors out on the routes.

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

ADVO/USPS-T13-12. With respect to the Videx TimeWand II Barcode Scanners,

(a) Please provide all documentation available on how to use the equipment.

(b) When the six-minute interval tone is programmed, is there a limitation on when data must first be entered? Is there a limitation on how long it takes to complete an observation?

(c) Is it possible to make corrections to one or more entries on the scanner during the observation?

(d) Do the scanners automatically time and date each observation?

(e) Do the scanners maintain the time sequencing of the observations?

RESPONSE:

(a) All instructions were given verbally to the data collectors. Videx provides a user guide for programming the scanners with each scanner. I have not been able to locate a copy of the guide.

(b) No, no observers were instructed to complete the scan as soon as possible.

(c) No.

(d) Yes, a date and time stamp is placed on each scan.

(e) Yes.

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

ADVO/USPS-T13-13. On page 13 of your testimony, you state that:
"Data collectors printed daily reports which the team reviewed for accuracy of scans and manual entries. Changes were not made on site; any changes to the data were noted and forwarded to the central database managers. After being reviewed, the data was uploaded to a central database."

(a) Please provide all written instructions and criteria given the data collectors on how they were to review for accuracy of scans and manual entries.

(b) Were there supervisory individuals on site/location who reviewed the accuracy of scans and manual entries? If so, provide all written instructions and criteria given to those individuals on how they were to review for accuracy.

(c) With respect to the forwarded changes from on-site, please quantify the following:

(1) The number of route-days which were noted as requiring some change.

(2) The number of individual observations by route-day which were noted as requiring some change.

(d) Please provide a list of all the types of changes that were forwarded.

RESPONSE:

(a) No written instructions were provided, all training was on the job.

(b) There were Postal Service subject matter experts and roving quality assurance observers. These individuals acquired their knowledge by participating in the development of the data collection structure.

(c) (1) No records were maintained on the number of route days requiring change.

(2) No records were maintained on the number of individual observations changed.

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

(d) Not available.

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

ADVO/USPS-T13-14. With respect to the central database managers for this project, please provide:

- (a) copies of all training and instruction manuals.
- (b) a description of the training of the central database managers, and
- (c) an explanation of how the database managers ran and reviewed the daily reports.

RESPONSE:

(a-b) No instruction manuals exist. Initially the database managers were the developers of the data collection. Additional database managers received on the job instruction from the original database managers.

(c) The database managers would print a set of reports from the software by selecting the observer, location and date. The database managers would then compare these reports to the records and reports from the field observers.

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

ADVO/USPS-T13-15. With respect to the changes made by the central database managers

- (a) Were there occasions when the changes forwarded from the site were not implemented by the database managers? Please explain and quantify by route-day.
- (b) Were there occasions when the database managers made changes which were different from those forwarded from the site? Please explain and quantify.
- (c) Please provide a list of all the types of errors identified by the database managers. If they can be quantified by type, please do SO.
- (d) When these types of errors were resolved, please explain generally how they were resolved.
- (e) Please describe the types of "outliers" that were investigated.

RESPONSE:

- (a) No, If the database managers had a question about the recommended changes, the database managers would discuss the question with the field observer the next day. The observers and database managers would then agree on the change. No summary records are available. The audit trail exists, but only in raw collected form. The occurrence of this process was very rare.
- (b) Yes, on rare occasions records were identified by the database managers and discussed with the observers before changes are made.
- (c) No summary records are available. The audit trail exists but in raw collected form. I do not have a list such as that requested.
- (d) Method of changes are discussed in (a) above.

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

- (e) A data record that was out of the expected norm. Examples: lunch break scans at the end of the day; or six vehicle inspection scans back to back.**

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

ADVO/USPS-T13-16. With respect to errors that were purged from the data set:

- (a) Please provide a list of all the types of errors that were purged and how your organization attempted to resolve them before purging them. If they can be quantified by type, please do so.
- (b) When there was an unresolved apparent error in only one or a small grouping of observations, were only those observations (tallies) eliminated or was the entire route-day eliminated? Please explain.
- (c) Please quantify the number of full route-days that were purged.
- (d) Please quantify the number of observations (tallies) that were purged on route-days that remained in the database.
- (e) Please quantify the number of route-days for which only some observations (tallies) were purged.

RESPONSE:

- (a) No summary records are available. The audit trail exists but only in raw collected form. If the database managers had a question about the recommended changes, the database managers would discuss the question with the field observer the next day. The observers and database managers would then agree on the change.
- (b) Typically tallies were not eliminated, tallies were corrected.
- (c) No full route days were purged.
- (d) No summary records are available. The audit trail exists but only in raw collected form.
- (e) No summary records are available. The audit trail exists but only in raw collected form.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF ADVO, INC.
Revised 4/24/2000

ADVO/USPS-T13-17. For each route code, from the data you collected on location, please provide the number of possible:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Number of residential centralized deliveries
- (d) Number of other residential deliveries
- (e) Number of business curb deliveries
- (f) Number of business NDCBU deliveries
- (g) Number of business centralized deliveries
- (h) Number of other business deliveries.

RESPONSE:

(a-h)

Unit Code	Route Number	Residential Other	Residential Curb	Residential NDCBU	Residential Central	Business Other	Business Curb	Business NDCBU	Business Central
CY02	1569	199	15	0	0	1	0	0	0
CY02	1579	275	50	0	195	45	1	15	0
CY02	1581	118	122	0	33	2	0	0	0
CY02	1595	352	0	0	142	0	0	0	0
CY03	4104	358	1	0	153	12	0	7	0
CY03	4106	198	166	0	0	4	31	0	0
CY03	4111	35	165	328	0	0	0	1	0
CY03	4114	215	190	0	0	0	0	0	0
CY03	4126	273	18	0	0	50	10	0	0
CY04	4207	0	215	0	0	28	0	0	2
CY04	4211	148	0	0	49	40	0	14	0
CY04	4213	72	0	0	0	75	0	0	13
CY04	4214	0	82	0	0	62	0	0	69
CY04	4218	0	93	0	0	615	2	0	0
CY04	4219	112	176	0	0	0	0	0	0
CY04	4221	97	239	0	0	0	0	0	0
CY04	4222	203	65	0	0	1	3	0	0
CY04	4224	149	10	0	33	112	2	0	0
CY04	4225	2	361	4	0	0	3	0	0
CY04	4228	0	236	0	0	49	0	3	11

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

CY04	4229	0	277	0	155	4	1	0	0
CY04	4230	42	0	0	50	136	0	47	10
CY04	4232	1	290	0	0	45	3	36	0
CY04	4233	383	0	0	0	34	0	8	0
CY04	4234	0	331	67	0	0	0	0	0
CY04	4235	90	38	0	0	69	1	0	0
CY04	4236	0	142	20	0	98	1	0	0
CY04	4237	177	0	0	30	91	0	0	0
CY04	4238	0	141	0	0	25	1	0	64
CY04	4241	0	111	86	0	68	2	0	26
CY04	4242	0	152	0	84	93	0	0	1
CY04	4243	0	254	0	56	0	62	0	0
CY04	4248	117	0	99	108	45	2	0	14
CY04	4249	0	202	15	16	13	4	0	0
CY04	4254	0	119	0	0	0	0	0	0
CY04	4257	51	159	0	0	50	16	9	0
CY04	4258	152	0	0	242	26	1	0	1
CY04	4259	176	0	0	0	60	0	0	0
CY04	4262	0	191	0	0	14	10	20	46
CY04	4265	163	48	0	0	65	0	14	0
CY04	4272	138	0		0	0	0	0	0
CY04	4285	142	7	122	146	1	0	0	0
CY04	4906	0	287	15	0	5	0	0	0
CY04	4908	0	80	0	0	78	7	0	0
CY04	4909	136	3	0	308	4	2	0	0
CY04	4910	0	106	0	0	23	1	0	66
CY04	4912	69	3	125	261	9	0	28	0
CY04	4915	0	316	0	0	7	11	0	0
CY04	4916	0	285	11	0	3	0	0	0
CY04	4917	0	73	0	0	0	0	0	0
CY04	4920	0	268	15	0	0	0	0	0
CY04	4926	0	562	0	0	0	2	0	0
CY04	4931	10	105	32	286	1	0	0	0
CY04	4940	0	349	0	0	0	0	0	0
CY04	4944	0	2	357	210	43	6	27	0
CY04	4945	0	25	263	0	55	11	43	0
CY04	4999	153	0	0	0	0	0	0	0
CY05	2806	340	0	0	0	118	0	0	0
CY05	2814	0	466	0	0	1	0	0	0
CY05	2822	374	0	0	0	0	0	0	0
CY05	2835	0	0	172	901	49	2	0	0
CY06	9302	0	369	0	0	0	2	0	0
CY07	8028	95	0	0	284	149	0	0	19
CY07	8035	49	396	0	0	0	0	0	0
CY07	8045	56	42	0	241	52	0	0	48
CY08	1620	26	409	0	0	0	0	0	0
CY08	1632	31	569	0	0	11	3	0	26
CY08	1638	217	3	0	37	0	0	0	0
CY09	2451	3	0	0	733	133	2	0	2

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

CY09	2465	90	0	336	447	18	0	0	0
CY09	2469	4	351	0	0	0	0	0	0
CY10	2155	2	257	14	0	4	23	6	1
CY10	2160	1	0	196	268	34	2	5	0
CY10	2167	7	281	83	0	5	4	7	19
CY10	2169	0	0	92	561	72	0	0	0
CY11	4708	346	0	8	223	46	0	0	0
CY11	4712	424	0	100	88	14	0	22	0
CY11	4719	442	0	0	43	1	0	0	0
CY11	4725	377	0	27	316	5	0	0	5
CY11	4731	291	0	24	241	0	0	0	0
CY11	4732	244	0	7	255	90	0	6	49
CY11	4811	100	0		0	0	266	4	0
CY11	4814	213	0	0	189	79	0	31	11
CY11	4817	296	0	0	0	72	0	0	19
CY11	4910	179	0	211	108	63	0	8	0
CY11	4921	320	0	101	226	0	0	0	0
CY15	1024	269	124	155	83	29	3	0	0
CY15	1061	340	22	0	234	17	5	0	1
CY16	1233	0	632	34	31	0	2	0	0
CY16	1237	0	486	15	48	51	21	0	0
CY16	1252	72	322	0	96	59	8	0	0
CY18	2934	499	0	0	0	22	0	0	0
CY19	4846	67	84	209	0	1	0	0	0
CY19	4880	104	94	0	162	13	1	0	0
CY23	0603	276	0	0	25	2	0	0	0
CY23	0607	218	0	0	0	0	0	0	0
CY23	0623	261	4	0	2	12	0	0	0
CY28	2374	0	24	40	513	26	47	14	0
CY28	2375	24	329	0	0	53	9	0	0
CY28	2385	209	165	0	203	8	0	22	0
CY29	4515	60	328	24	0	5	43	0	0
CY30	4442	0	424	148	0	0	0	0	0
CY38	8008	162	162	9	0	3	1	0	0
CY38	8044	0	308	0	31	1	25	30	1
CY38	8229	175	163	0	0	2	1	0	0
CY39	0908	0	152	272	177	24	0	0	8
CY39	1205	103	285	31	0	2	0	0	0
CY39	1206	0	72	370	386	2	0	0	0
CY40	8404	180	0	0	200	130	1	0	1
CY40	8405	477	0	0	0	3	0	0	0
CY40	8408	278	55	0	0	25	24	16	0
CY41	0626	0	0	0	0	39	0	0	0
CY42	1946	0	0	0	1151	31	0	0	0
CY46	1132	69	344	18	195	4	4	0	0
CY46	1133	18	369	23	191	0	0	0	1
CY46	1142	0	415	56	0	1	0	0	0
CY46	1145	161	203	51	34	0	0	0	0
CY46	1148	0	342	146	0	2	1	0	0

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

CY47	1411	372	75	0	0	0	0	0	0
CY47	1475	0	0	348	288	79	1	0	132
CY47	1507	71	184	354	0	16	0	0	8
CY47	1508	342	1	220	140	3	0	0	0
CY47	1586	224	0	301	0	0	0	0	0
CY48	0105	145	0	0	0	175	0	9	0
CY48	0146	367	23	0	0	3	0	0	0
CY48	0164	0	130	476	0	57	5	0	0
CY48	0337	0	387	0	0	1	1	0	0
CY49	0101	204	150	103	68	253	7	0	0
CY49	0102	81	6	0	24	313	91	0	1
CY49	0711	216	68	0	42	0	0	0	0
CY49	0716	0	345	299	0	2	5	1	0
CY50	8701	0	189	0	0	5	3	80	33
CY50	8702	2	572	0	0	2	1	11	0
CY50	8703	0	596	100	0	0	5	0	0
CY50	8705	0	308	0	0	44	7	18	0
CY50	8711	0	386	0	0	3	5	0	0
CY50	8714	0	459	0	0	0	0	0	0
CY50	8717	1	572	0	0	1	3	0	0
CY50	8726	1	573	0	0	0	1	0	0
CY50	8727	0	388	0	0	1	2	0	0
CY50	8729	2	540	0	0	0	0	0	0
CY50	8735	0	361	0	0	19	17	0	24
CY50	8736	1	558	0	0	1	0	0	0
CY50	8739	1	135	358	268	2	3	1	0
CY50	8744	0	351	0	0	0	0	0	0
CY50	8747	0	547	0	0	18	2	0	0
CY50	8748	0	483	0	0	0	0	0	0
CY50	8756		0	0	0	3	6	0	0
CY50	8759	1	134	358	268	2	3	1	0
CY50	8770	0	462	0	0	0	4	0	0
CY51	6156	33	417	0	0	0	0	0	0
CY51	6157	9	449	0	0	0	0	0	0
CY51	6410	478	1	0	26	73	0	1	0
CY51	6419	517	5	0	6	4	0	0	0
CY52	1101	40	0	20	714	35	0	0	6
CY52	1111	132	0	0	120	145	0	0	49
CY52	1121	140	145	0	0	1	0	0	0
CY52	1131	7	324	0	0	0	0	0	0
CY53	2201	362	0	0	0	24	0	0	14
CY53	2202	182	0	0	243	2	0	0	0
CY53	2203	333	0	0	116	0	0	0	0
CY53	2205	181	0	0	178	6	0	0	0
CY53	2206	315	0	0	109	3	0	0	0
CY53	2207	360	0	0	16	14	0	0	4
CY53	2210	189	0	0	271	34	0	0	0
CY53	2211	361	0	0	104	24	0	0	0
CY53	2212	291	0	0	43	0	0	0	0

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

CY53	2213	213	0	0	216	22	0	0	0
CY53	2214	182	0	0	393	28	0	0	0
CY53	2215	161	0	0	371	0	0	0	0
CY53	2216	369	0	0	107	0	0	0	0
CY53	2219	301	0	0	51	54	0	0	0
CY53	2221	269	0	0	95	85	0	0	0
CY53	2224	331	0	0	12	13	0	0	0
CY53	2225	347	0	0	22	1	0	0	0
CY53	2227	387	0	0	46	0	0	0	0
CY54	0411	351	33	0	0	48	0	0	0
CY54	0424	38	533	0	0	9	1	0	0
CY54	0432	585	38	0	0	16	0	0	0
CY54	0474	175	50	40	302	51	12	0	1
CY55	0611	328	0	0	0	10	0	0	0
CY55	0621	364	0	0	0	0	0	0	0
CY55	1605	1	18	0	0	145	4	14	172
CY55	1608	53	0	95	227	115	0	0	26
CY56	0405	220	3	168	95	44	4	1	1
CY56	0467	0	328	315	112	0	1	1	1
CY56	0498	0	73	115	457	55	65	40	0
CY56	1049	2	528	107	163	7	55	18	2
CY57	3704	327	0	0	84	3	0	0	0
CY57	3707	320	22	0	0	1	0	0	0
CY57	3709	49	0	0	467	33	0	0	0
CY57	3716	106	0	0	434	3	0	0	0
CY58	8212	201	0	0	6	0	0	0	0
CY58	8217	184	0	0	20	0	0	0	0
CY58	8218	4	0	0	573	0	0	0	0
CY58	8221	147	14	0	0	0	8	0	0
CY59	0305	173	0	0	110	79	0	0	5
CY59	0320	355	0	12	240	21	0	0	0
CY59	2402	33	0	0	520	3	0	0	0
CY59	2417	130	0	0	313	2	0	0	0
CY60	1901	98	394	4	0	93	15	18	0
CY60	1913	561	2	0	0	17	0	0	0
CY60	1917	0	48	282	337	118	61	82	0
CY60	1929	253	348	0	0	11	3	0	0
CY61	2717	0	383	167	70	13	1	0	0
CY61	4271	0	634	0	157	7	0	0	0
CY61	4273	0	728	161	0	2	4	0	0
CY61	4275	0	687	0	0	4	0	0	0
CY62	0406	129	0	0	0	155	2	0	0
CY62	0415	470	0	0	0	44	0	0	0
CY62	0424	363	1	68	513	24	1	0	0
CY62	0426	178	7	15	152	168	3	0	0
CY63	0801	193	1	0	0	6	0	0	0
CY63	0802	251	0	0	0	1	0	0	0
CY63	0803	192	1	0	0	2	0	0	0
CY63	0806	413	0	33	12	1	0	0	0

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

CY63 0807	174	172	0	0	1	0	0	0
CY63 0808	342	6	0	0	0	0	0	0
CY63 0809	311	0	0	0	0	0	0	0
CY63 0811	103	47	0	0	98	0	0	0
CY63 0815	367	1	0	0	0	0	0	0
CY63 0816	208	1	0	0	0	0	0	0
CY63 0817	283	0	0	0	1	0	0	0
CY63 0819	267	10	1	0	53	1	0	0
CY63 0820	249	66	0	0	0	0	0	0
CY63 0821	145	24	0	0	106	0	0	0
CY63 0822	46	250	0	0	0	0	0	0
CY63 0823	190	32	0	285	10	1	0	21
CY63 0824	242	140	0	0	1	0	0	0
CY63 0825	8	269	0	0	1	0	0	0
CY63 0827	75	77	0	0	153	10	0	0
CY63 0828	168	95	0	0	0	0	0	0
CY63 0830	163	161	84	0	51	0	0	0
CY63 0831	0	255	198	0	9	0	1	0
CY63 0832	150	0	0	66	109	0	20	33
CY64 1401	407	4	0	0	5	1	0	0
CY64 1457	168	53	32	79	86	0	0	0
CY64 2407	1	243	8	16	51	1	0	0
CY64 2411	0	268	0	0	5	1	0	0
CY66 0101	133	1	134	68	121	0	12	48
CY66 0102	324	7	55	112	51	0	5	0
CY66 0103	43	0	0	0	325	0	0	10
CY66 0104	51	2	9	90	182	0	0	5
CY66 0105	202	15	174	46	91	0	73	27
CY66 0106	291	53	166	68	54	0	14	4
CY66 0107	138	126	80	22	115	3	12	33
CY66 0108	172	25	13	36	104	1	27	0
CY66 0110	308	23	159	154	17	0	0	0
CY66 0111	15	399	259	4	8	10	90	0
CY66 0112	378	94	161	9	8	0	0	0
CY66 0113	211	88	321	0	42	6	2	0
CY66 0114	8	307	236	0	53	21	24	0
CY66 0115	15	419	98	0	13	26	18	0
CY66 0116	280	221	31	0	3	0	0	0
CY66 0117	137	377	135	0	1	0	0	0
CY66 0119	220	165	118	0	16	0	19	4
CY66 0120	482	35	27	0	12	2	0	0
CY66 0123	288	133	102	28	42	1	1	2
CY66 0124	14	221	377	0	11	25	44	0
CY66 0126	293	104	157	18	1	1	0	0
CY66 0128	240	155	241	0	112	14	25	0
CY66 0129	208	6	256	0	1	0	0	0
CY66 0130	99	17	364	0	0	0	0	0
CY66 0131	0	0	318	0	0	0	0	0
CY66 0240	28	29	82	0	200	8	75	17

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

CY66	0241	24	216	322	139	88	8	13	4
CY66	0242	127	163	59	0	66	0	13	49
CY66	0243	1	182	22	102	146	9	8	21
CY66	0244	84	424	147	40	19	9	69	8
CY66	0245	323	96	225	4	0	2	0	0
CY66	0246		350	225		16	1		10
CY66	0247	56	355	276	146	9	7	21	0
CY66	0248	33	345	373	0	3	6	3	0
CY66	0249	147	156	312	0	3	0	0	0
CY66	0250	47	34	154	4	176	3	24	5
CY66	0251	115	159	342	0	68	6	10	11
CY66	0252	169	170	264	0	10	23	38	0
CY66	0253	226	72	212	147	87	5	54	0
CY66	0254	165	150	367	0	1	0	0	0
CY66	0255	24	0	620	0	8	0	0	0
CY66	0256	458	0	187	0	1	0	0	0
CY66	0257	73	51	488	8	73	14	16	0
CY66	0281	54	164	213	0	59	70	146	0
CY66	0370	1	327	401	0	1	5	1	0
CY66	0371	19	12	757	143	13	5	9	0
CY66	0372	270	119	346	26	26	5	11	0
CY66	0373	6	404	452	0	8	30	27	0
CY66	0374	199	0	415	124	0	0	0	0
CY66	0375	1	346	440	0	27	8	23	0
CY66	0376	65	98	35	307	44	1	0	0
CY66	0377	29	107	712	67	14	9	16	0
CY66	0378	157	131	326	148	6	2	10	0
CY66	0379	20	8	668	0	110	4	44	0
CY66	0380	91	293	505	8	6	2	0	0
CY66	0382	314	54	251	0	1	0	0	0
CY66	0383	53	24	671	50	68	1	32	0
CY66	0384	5	26	769	0	4	1	21	0

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

ADVO/USPS-T13-18. For each route/day, from the data you collected on location, please provide the number of actual deliveries made. If possible separate them by type:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Number of residential centralized deliveries
- (d) Number of other residential deliveries
- (e) Number of business curb deliveries
- (f) Number of business NDCBU deliveries
- (g) Number of business centralized deliveries
- (h) Number of other business deliveries.

RESPONSE:

(a-h) No summary records maintained on the actual deliveries made.

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

ADVO/USPS-T13-19. With respect to the use of the Engineered Standards data for "support/update" of the Street-Time Survey (STS):

(a) When were you first advised that data from the Engineered Standards data collection might be used for postal rate case costing purposes as a "support/update" for the Street-Time Survey (STS)?

(b) Please identify all the USPS and USPS contractor representatives with whom you discussed the use of the ES data for support update of the STS, and when you first discussed it with them.

(c) Please provide copies of all requests, proposals, instructions and correspondence with the USPS and/or USPS contractor representatives relating to such use of the ES data.

(d) Did you review any documentation for the Street-Time Survey? If SO, what STS documentation did you review, and when did you review it?

(e) Did you review any documentation on the Foot Access Test, the Curblin Access Test, or the Load Time Variability Test? If so, what documentation did you review, and when did you review it?

RESPONSE:

(a) August/September 1999

(b) Donald Baron - contractor Foster Associates

Dennis Stephens - employee USPS

John Kelley - employee USPS

Robert Boldt - independent contractor with Resource & Process Metrics, Inc.

William Lloyd - Resource & Process Metrics, Inc.

(d) Yes, we received definitions as stated in appendix F.

(e) No other tests were reviewed.

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

ADVO/USPS-T13-19. With respect to the use of the Engineered Standards data for "support/update" of the Street-Time Survey (STS):

(c) Please provide copies of all requests, proposals, instructions and correspondence with the USPS and/or USPS contractor representatives relating to such use of the ES data.

RESPONSE:

(a) All discussions were verbal, and no records were kept of the content of these discussions.

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

ADVO/USPS-T13-20. Did the USPS or any USPS contractor provide any written or oral guidance or assistance on how to translate the individual observations/tallies in your data into the six STS categories? If so, please identify those individuals, provide copies of any written guidance or assistance, and describe any oral guidance or assistance.

RESPONSE:

We provided to the USPS and USPS contractors the description of the content of the Engineered Standards observations/tallies. The USPS provided the six definitions from appendix F of my testimony.

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

ADVO/USPS-T13-21. Please explain how the out-of-office observations were initiated and ended.

(a) Did the data collectors identify the check-out time when carriers left for the street or the check-in time when they returned to the office?

(b) For any one route, at what points were the Videx TimeWand II Barcode Scanners initiated to start counting six minute intervals at the beginning of out-of-office time and for the end of lunch break? Did this vary by route?

(c) For any one route, at what points were the scanner stopped for lunch break and for the end of out-of-office time?

RESPONSE:

(a) 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. 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.

(b) The barcode scanners six minute intervals began when the scanner was removed from the docking station. The observations began when the carrier clocked in. Observations continued through the entire day, including breaks. All routes were observed in an identical manner.

(c) None, observations continued through the entire day.

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

ADVO/USPS-T213-22. On page 14 of your testimony, you state:
"The scan sequence for each line of the database was reviewed and one of the STS categories was entered. To crosscheck the manual review process, a master list of scan sequences were grouped according to STS activity. All scan-sequence possibilities for an STS activity were assigned a I-6 code. An update query was then used to assign the sequences a code in the database. These codes appear in the Library Reference USPS-LR-I-163 with the column header "STS Type."

(a) Was the initial assignment to STS category done manually? If so, who was responsible for the assignment and at what point in the processing was it done?

(b) On page 14, you state that the column "STS Type" contains the definitions entered by manual sequence review, but on page 15 you state that this column contains the numeric codes assigned by the master list. Please explain.

(c) How was the master list used to crosscheck the manual sequence review?

(d) Please provide the master list of scan sequences.

RESPONSE:

(a-b) An initial test was performed manually, after this test a query was written in Access® to define the entire database.

(c) A record-by-record comparison was performed.

(d) Please refer to Appendix D and Appendix F of my testimony.

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

ADVO/USPS-T13-23. Please provide the following information with respect to the sample survey that generated the data presented in your testimony and used by USPS witness Baron:

(a) the "definition of the universe under study, the sampling frame and units, and the validity and confidence limits that can be placed on major estimates," as required by Rule 31(k)(2)(ii) of the Commission's Rules of Practice.

(b) a description of all sampling and statistical tests performed with respect to the data collection.

(c) the results of all such sampling and statistical tests.

RESPONSE:

(a) This part of the interrogatory has been redirected to Witness Donald Baron.

(b) Please see Witness Baron's response to part (a). This response presents the primary statistical tests that have been performed to validate the street-time percentages that he estimated based on data obtained in the sample survey.

Also relevant to this question are the series of sampling and statistical analyses that the Engineered Standards study team conducted to determine the size of the sample of observations it would need to produce precise measures of carrier activities. Note first that the engineered standards sample consisted of sites purposively selected by the area management and sites picked at random. However, all routes within both sets of sites were picked at random.

Three basic approaches were applied in these analyses to determine the required numbers of routes to include in the sample. The first approach was statistically based. The second approach was a comparison of the sample to USPS national profiles, and the third approach was a comparative review of the random data to the USPS management-picked sites.

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

2

In my response to OCA/USPS-T13-1, I presented the foundation of the statistical-based approach used to project sample size. I stated that Engineered Standards determined the sample size based on the number of time studies, and not on the number of routes needed for work sampling. To ensure that the number of observations for time study exceeded the number of observations for work sampling, Engineered Standards took a typical day in the life of a carrier and created an Excel spreadsheet to project the estimated sample size required for time study. The confidence level was set at 95%, with the level of accuracy at $\pm 5\%$. Library Reference USPS LR-I-293 presents the Excel file Hiloproc.xls, which shows the estimated values as of 10/21/96, and the actual values at the end of Phase 1 of data collection, 3/3/97. Based on the actual values, it was determined that the sample was within acceptable levels of accuracy for work sampling at the end of Phase 1.

The second approach was a comparison of the sample to USPS national profiles. Library Reference USPS LR-I-293 presents the Excel file Age_genderP1.xls. This file compares the ages and genders of carriers on the routes that had been sampled by the end of Phase 1 with national averages, and it shows that the sample at this point in time was very close to the national average.

Library Reference USPS LR-I-293 presents a third Excel file, ADVO231r1Tbl.xls. One of the sheets in this file, "Age and Gender," compares the ages and genders of carriers in the random sample with non-random sample data, and with the combined random and non-random data. These three data profiles are then compared with the USPS's national profile at the end of the Phase 2 data collection. The data at this point in time were also close to the national average.

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

3

The third approach used to determine sample size was a review of the random-site reports compared to the management-picked site reports. This comparison is presented in the "Random to MGT picked comparison" sheet of the ADVO23lr1Tbl.xls workbook. The random-site data were combined with the management-picked-site data to create a combined set. Then the random-site data and the management-picked-site data were each compared to the combined set. A review of each of the items listed in the workbook shows no appreciable difference among the data sets. That is, the management-picked sites produced the same results as the random sample of sites.

(c) This part of the interrogatory has been redirected to Witness Donald Baron.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
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.

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

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

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

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, HBMS. 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
---	------------	------------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

2. Party line and protocol	P. Johnson	10:15-10:30 AM
----------------------------	------------	----------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

3. Orientation Week Schedule	L. Raymond	10:30-10:40 AM
------------------------------	------------	----------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

4. Team introductions	L. Raymond	11:00 - 11:10 AM
-----------------------	------------	------------------

Discussion:	Organization Chart
Conclusion:	

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

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

5. Orientation Package Review	L. Raymond	11:10 - 12:00 PM
--------------------------------------	------------	------------------

Discussion:	Book, Plan, LCRES Case
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

6. Flow chart, Forms, Pictures - Overview	S. Jones	1:00 - 3:00 PM
--	----------	----------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

7. Site visits (Inside and Outside) - Do's & Don'ts	S. J. , D.H., L.R.	3:15 - 5:00 PM
--	--------------------	----------------

Discussion:	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.
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

8. ATK, EDS, HBMCo. Discussion	D.R., P.J., L.R.	5:00 - 6:00 PM
---------------------------------------	------------------	----------------

Discussion:	PD, Travel, Work Hours, Etc., Dress Code, Team Interaction
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

9. Site visits (Inside and Outside)	L. Raymond	6:30AM -4:00 PM
--	------------	-----------------

Discussion:	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
--------------------	--

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

Conclusion:	
-------------	--

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

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

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

11. IE methodologies - Overview	L. Raymond	4:30 - 4:45 PM
---------------------------------	------------	----------------

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
-------------------------------------	------------	----------------

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
-----------------------------	------------	----------------

Discussion:	Why, What Ifs!!!!
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

14. Work Plan	L. Raymond	7:15 - 7:30 AM
---------------	------------	----------------

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

Discussion:	Weekly Schedule
Conclusion:	

Action Items:	Person Responsible:	Deadline:

15. Orientation Package	L. Raymond	7:30 - 8:00 AM
--------------------------------	-------------------	-----------------------

Discussion:	Q & A,
Conclusion:	

Action Items:	Person Responsible:	Deadline:

16. Flow chart, Forms, Pictures - Details	S. Jones	8:00 - 12:00 PM
--	-----------------	------------------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

17. Q & A	L. Raymond	1:00 - 2:00 PM
----------------------	-------------------	-----------------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

18. IE methodologies	L. Raymond	2:00 - 4:00 PM
-----------------------------	-------------------	-----------------------

Discussion:	Detail - Show and Tell
Conclusion:	

Action Items:	Person Responsible:	Deadline:

19. Site visits (Inside and Outside)	TEAM	7:00 - 3:00 PM
---	-------------	-----------------------

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

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

Action Items:	Person Responsible:	Deadline:

20. Q & A @ the Dewy Building	TEAM	3:00 - 4:00 PM
--	-------------	-----------------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:

21. IE methodologies	L. Raymond	7:00 - 9:00 AM
-----------------------------	-------------------	-----------------------

Discussion:	More details on approaches to be used - Show and Tell
Conclusion:	

Action Items:	Person Responsible:	Deadline:

22. Work Plan	L. Raymond	9:00 - 10:00 AM
----------------------	-------------------	------------------------

Discussion:	Review Milestones
Conclusion:	

Action Items:	Person Responsible:	Deadline:

23. Orientation Package	L. Raymond	10:00 - 11:00 AM
--------------------------------	-------------------	-------------------------

Discussion:	Discuss Case
Conclusion:	

Action Items:	Person Responsible:	Deadline:

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

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

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

25. Q & A	L. Raymond	11:30 - 12:30 PM
-----------	------------	------------------

Discussion:	
Conclusion:	

Action Items:	Person Responsible:	Deadline:
---------------	---------------------	-----------

--- 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

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

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

CONDUCT OF CONTRACTOR

DRESS CODE

1. Casual dress (no jeans)
2. Knit shirts (no writing)
3. Comfortable shoes (no canvas or sandals) (extra pair on rainy days)

4, 10 - police

BE PROFESSIONAL

Poise yourself properly - no sitting or leaning

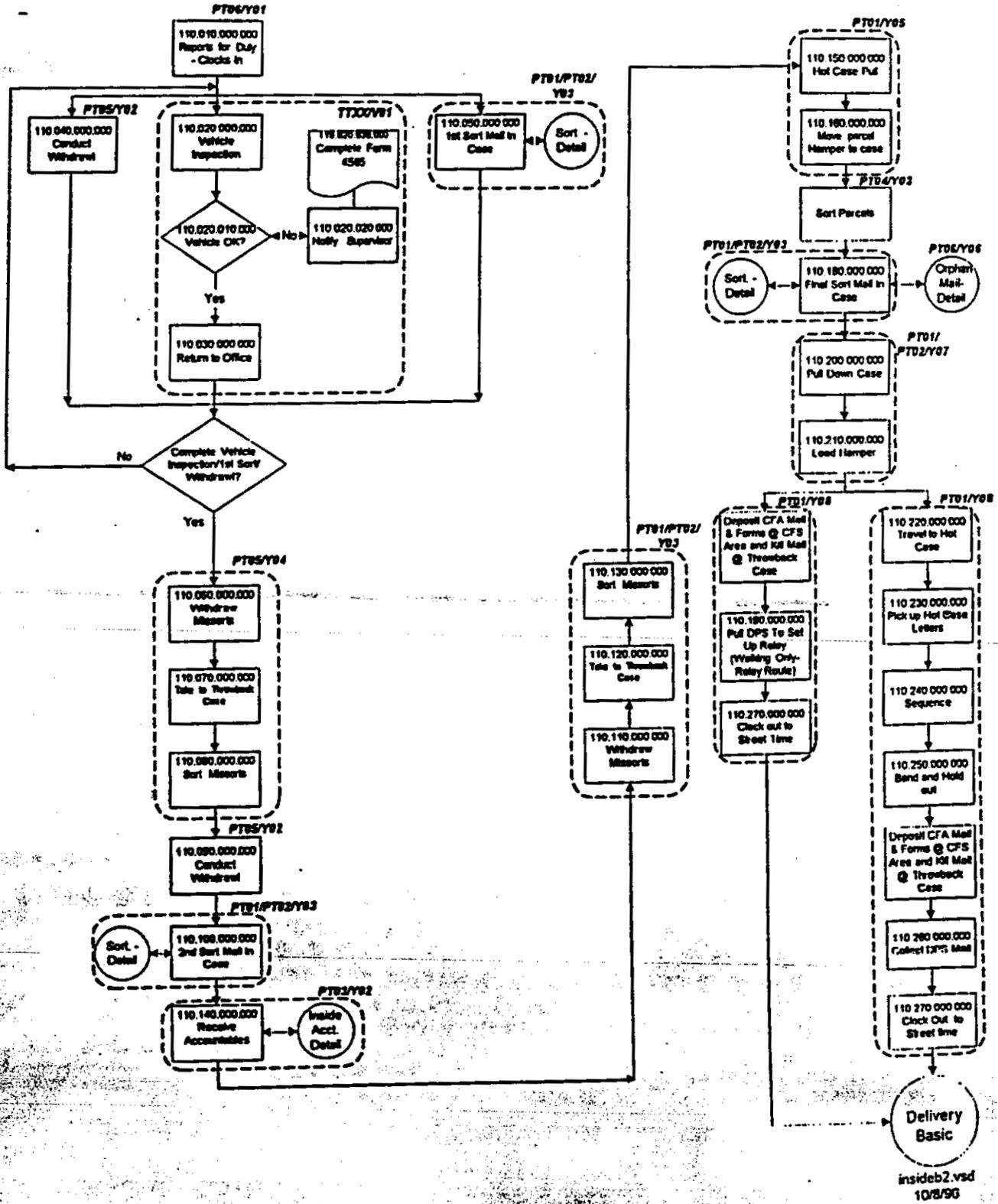
No loud talking

Speak as little as possible to subject

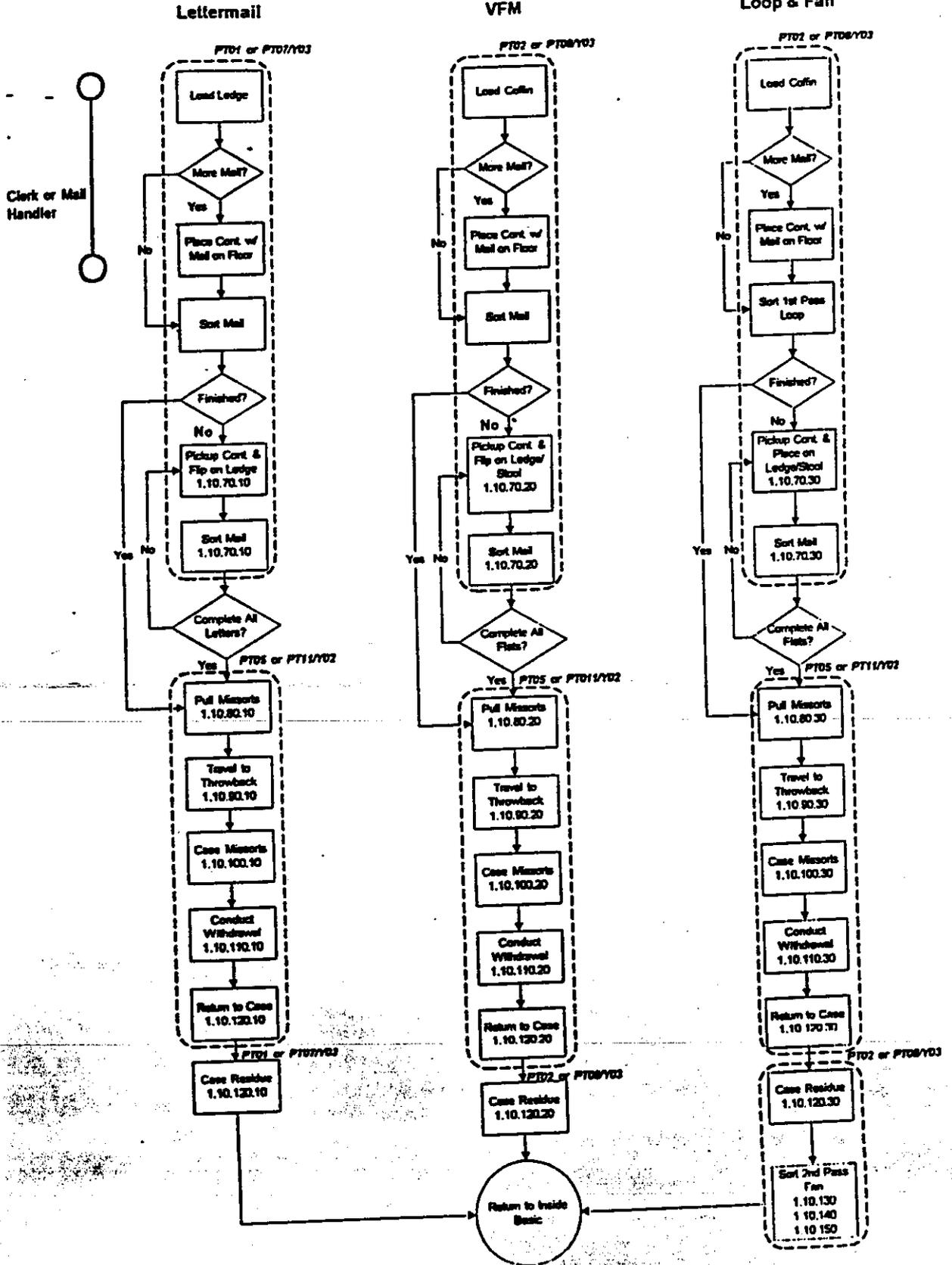
No political, religious, or sexual remarks

Dist Fed Management

Inside - Basic 110.000.000.000

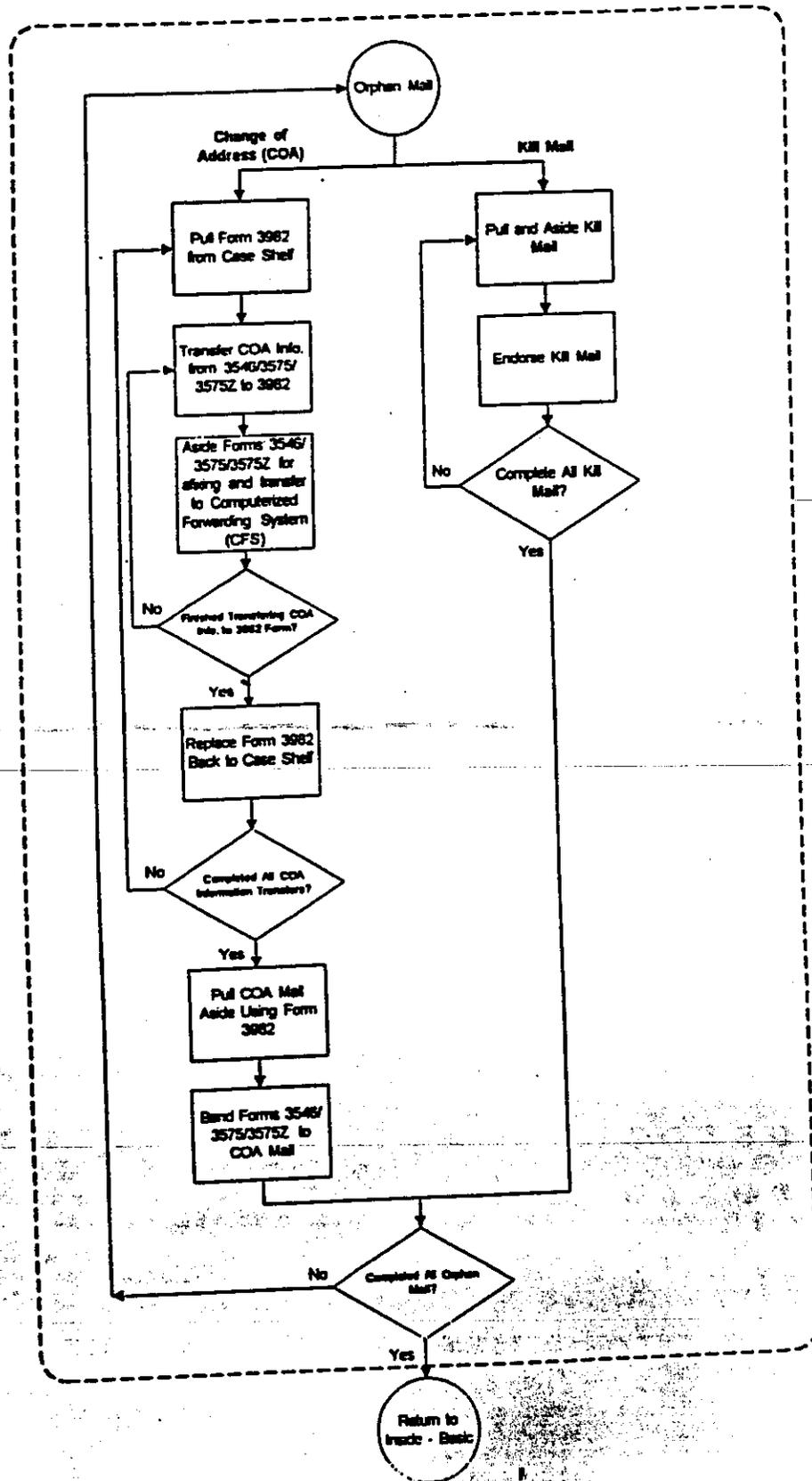


Sortation - Detailed



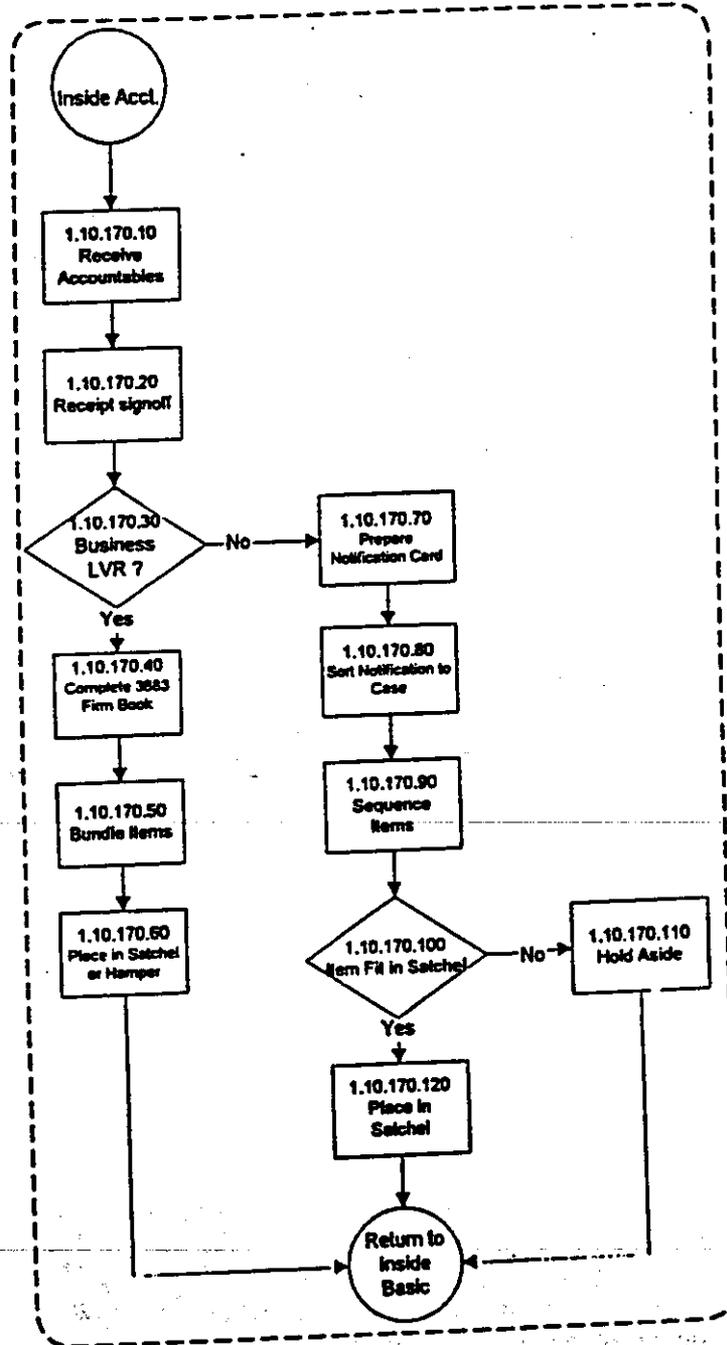
Orphan Mail (COA & Kill Mail)- Detail

P106/106

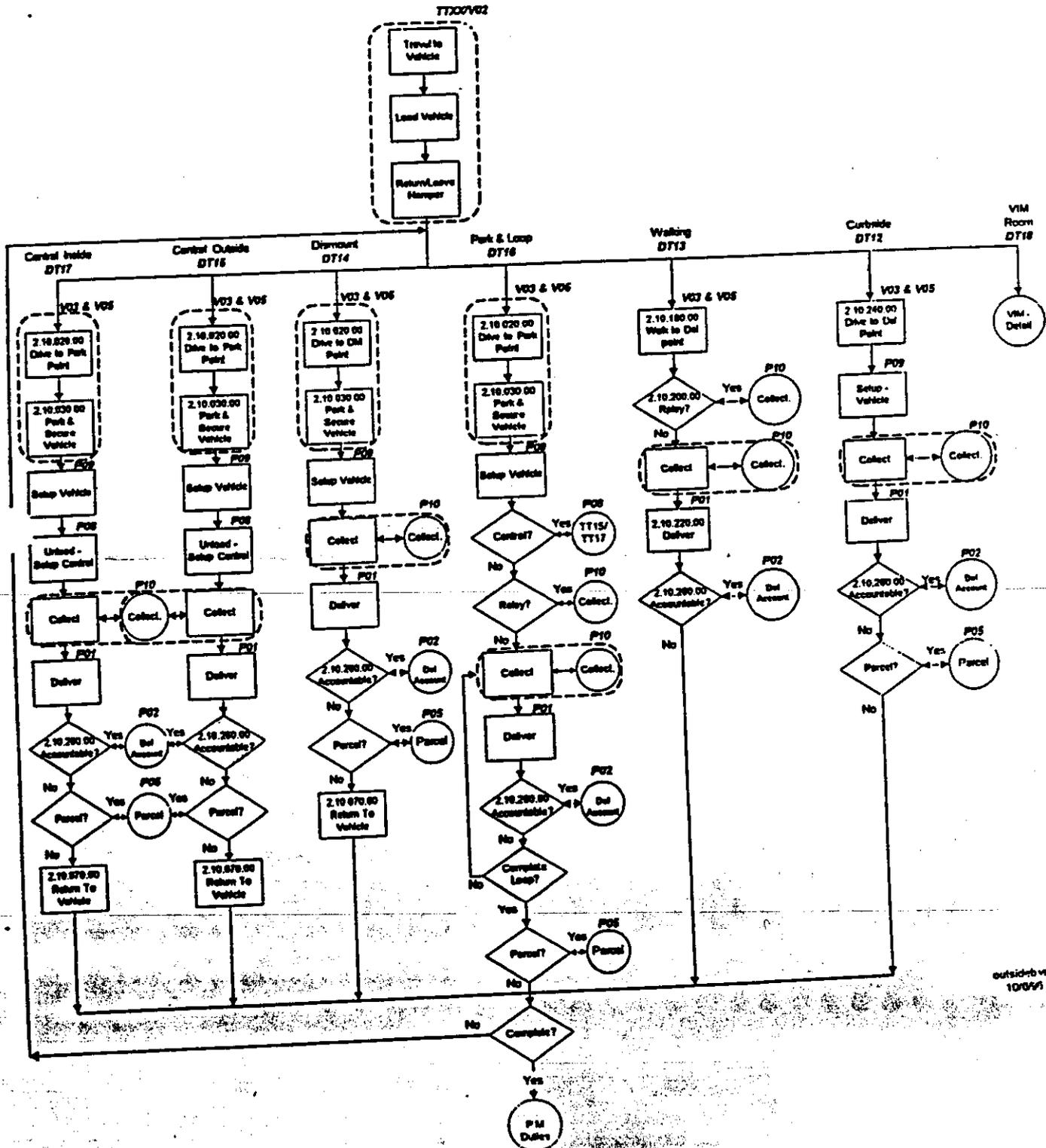


Inside Accountables - Detail

PT03/Y02/Y04



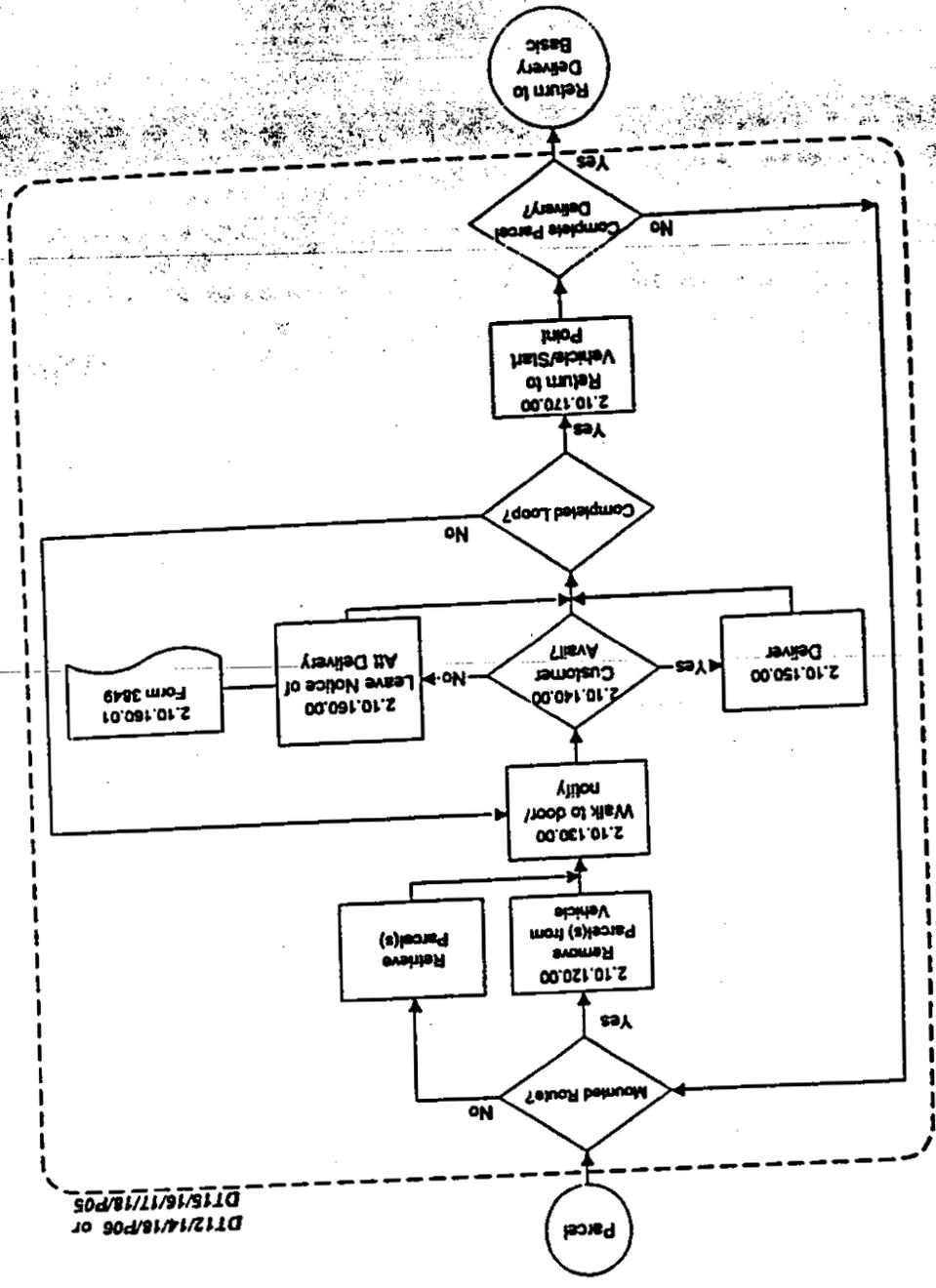
Delivery - Basic 210,000,000.000



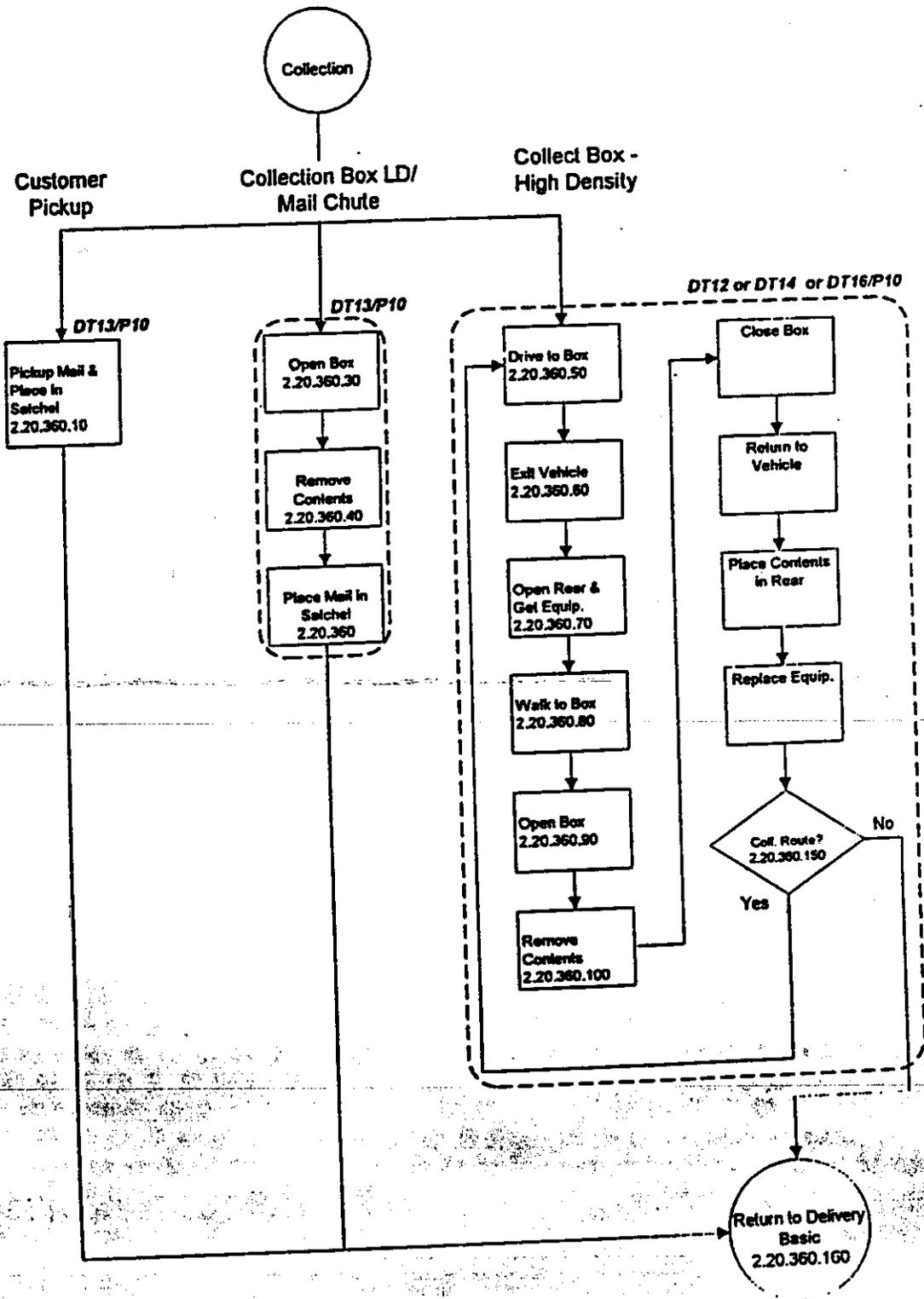
outside v02
10/0/01

Parcel Delivery - Detail

DT12/14/18/P06 or
DT15/16/17/18/P05

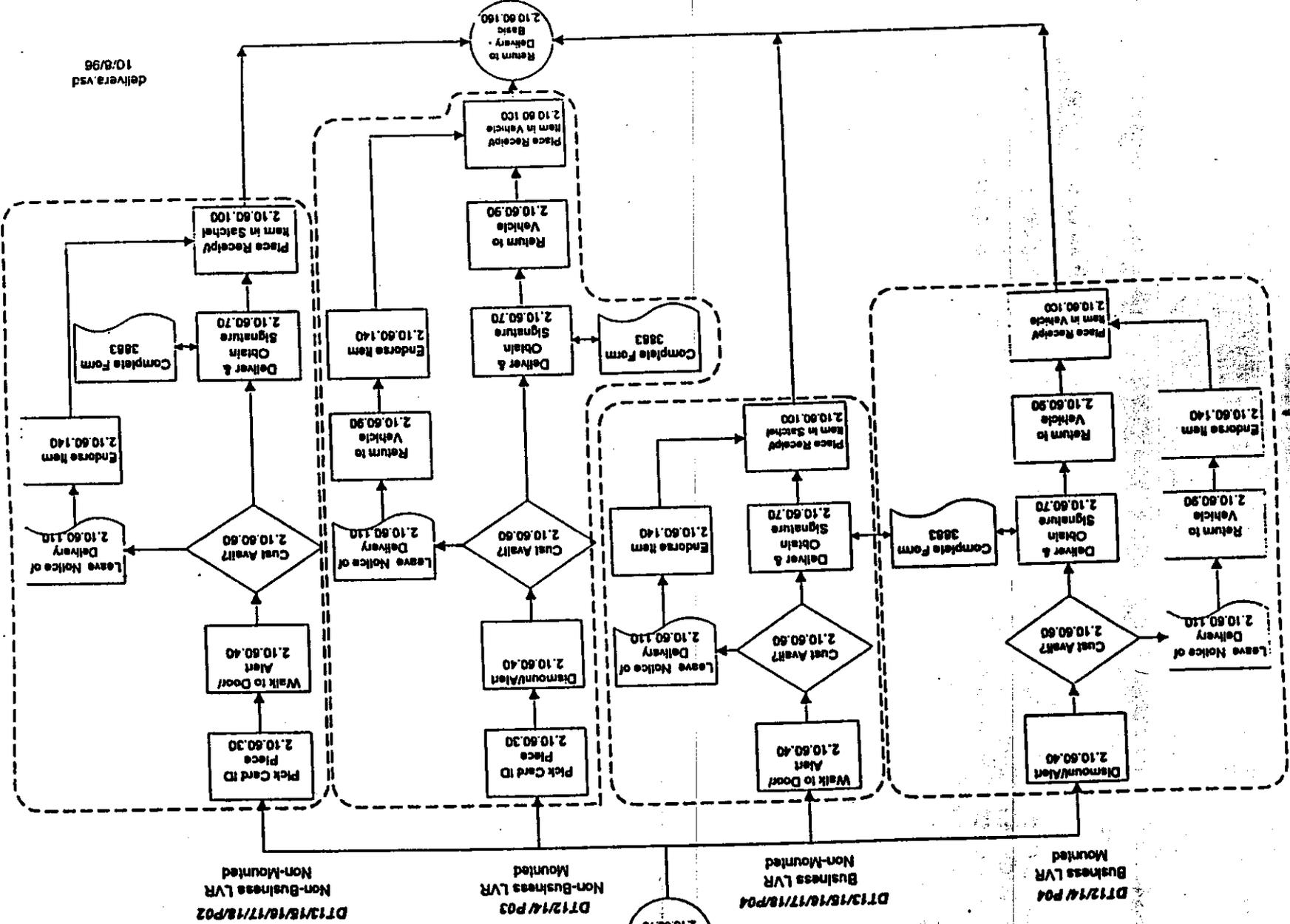


Collection - Detail



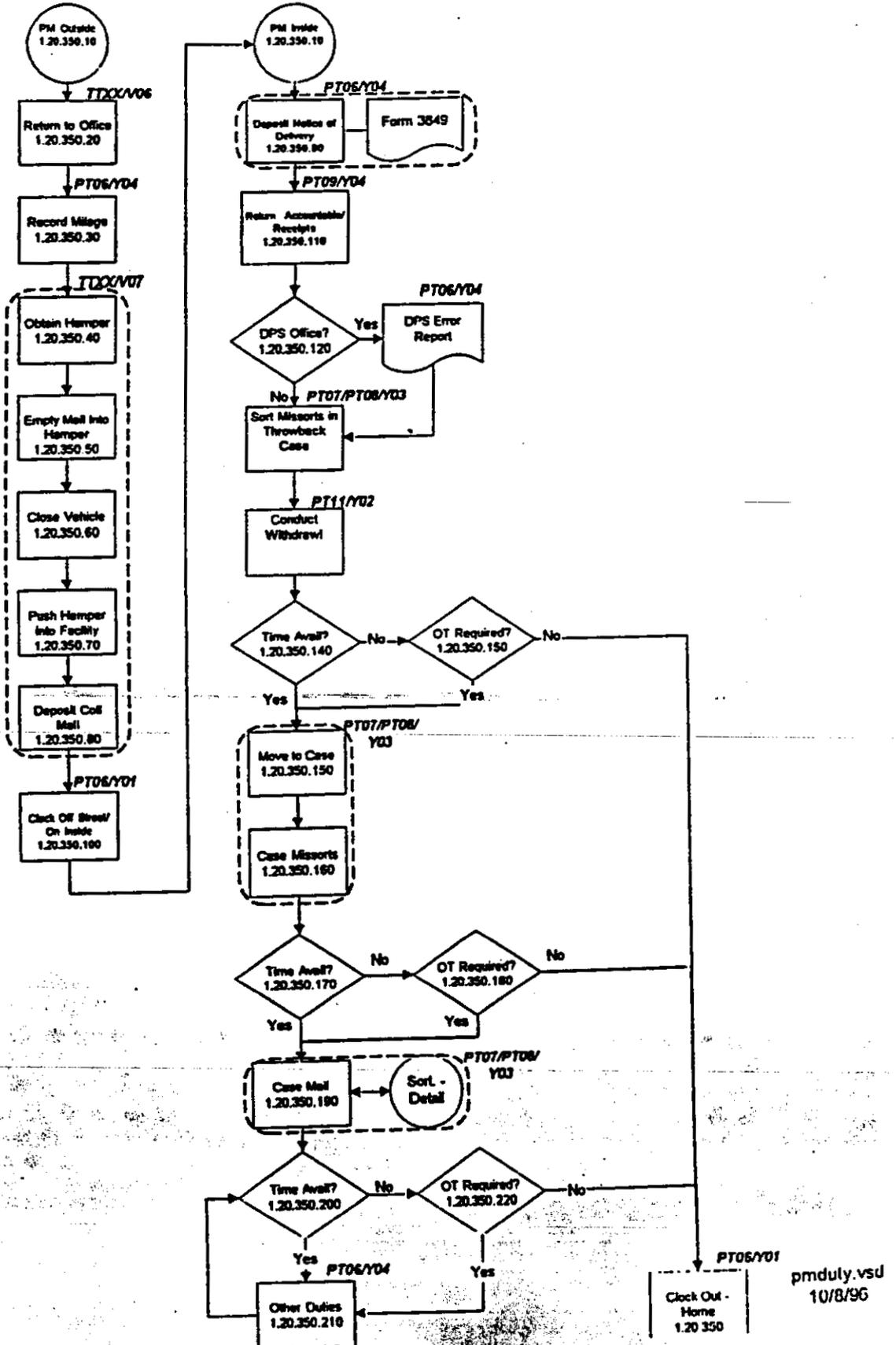
Delivery Accc table - Detail

Del Account
2.10.00.10



delivra.vsd
10/8/96

PM Duties



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
TO ADVO INTERROGATORIES**

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.

InTraining	ATrainer	bTrainer	aQC	bQC
OBS10	OBS46			
OBS10	OBS43	OBS38		
OBS10	OBS38			
OBS10	OBS25			
OBS10	OBS46	OBS25		
OBS10	OBS46	OBS25		
OBS10	OBS46	OBS25		
OBS10	OBS57			
OBS10	OBS61			
OBS10	OBS61			

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

occur in all of the delivery types. Based on the wide variety of receptacles available to the USPS customers it is possible for many of the level 11.4.1 receptacle types to be associated with any delivery type.

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

ADVO/USPS-T13-72. The LR-163 database includes route-days where there are neither "Loading" or "Travel to First Delivery" tallies, and route-days where there are neither "Unloading" or "Return to Unit" tallies (i.e., the day begins or ends with Drive, FAT/CAT, or Load activities). Please explain them.

RESPONSE:

There are a couple reasons why this occurs in a six minute work sampling. The activity takes less than six minutes. Some other activity occurred during the expected activity. For example, the carrier may have been in the process of loading the vehicle and was interrupted to return to the workstation to collect additional mail. Or the carrier may have been refueling the vehicle at a gas station while traveling to the first delivery or returning to the unit. Stopping to refuel the vehicle occurred over hundred times during the study.

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

ADVO/USPS-T13-73. In the data provided in response to MPA/USPS-T13-26, there are gaps in the CY codes, (CY1, 12, 13, 24, and 25 are missing). Please provide an explanation of what the missing CY codes represent and explain why they are missing.

RESPONSE:

"CY01" was the development and test site for the data collection strategy. This data is not included in any of the Engineered Standards databases. The data was used to verify the data collection methodology and the observers' ability to collect the data in Phase 1. This data was then deleted from the database and does not exist in any form.

"CY12, CY13, CY24 and CY25" codes were skipped for no reason. The barcode scanner does not care what number is associated with the code. The scanner requires the alpha character to be used at the appropriate barcode level.

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

ADVO/USPS-T13-74. As part of either the Delivery Redesign project, the Engineered Standards project, or the specific data collection project that is the Subject of your testimony, were any data collected or analyses undertaken to study or identify the relative characteristics (such as but not limited to average mail volume per route, per stop, or per delivery) of delivery units or routes with high DPS volumes, compared to those with average or low DPS volumes? If so, please provide all such data, analyses, documents and information.

RESPONSE:

Yes, there were many analyses performed on volume. Reports on these analyses are contained in 13 binders of reports that are the subject of Presiding Officer's Ruling No. R2000-1/27. These books were made available for inspection by representatives of Advo, Inc., among others, at the technical conference held on April 6, 2000, pursuant to Ruling No. R2000-1/27. I am informed that any requests for additional inspection of these documents under the protective conditions mandated by Ruling No. R2000-1/27 should be directed to Postal Service counsel.

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

ADVO/USPS-T13-75. The LR-163 database contains numerous central inside/central outside activity detail tallies for park & loop, foot, and dismount delivery types. How and why are these tallies different from central delivery type tallies?

RESPONSE:

Smaller central delivery types can be serviced as part of a park and loop, as a dismount or on a foot/walk out route. An example of this would be the 8-unit NDCBU's that are common in newer condominium complexes. Some central deliveries are handled as a dismount; a low-mail-volume, 4-unit apartment building would be an example. There is no difference between these tallies and the central delivery type tallies except for the how the route is defined by the USPS as a "walk out route". The carrier would have used an "Arrow" key to open the group of central boxes.

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

ADVO/USPS-T13-76. Please refer to your response to UPS/USPS-T13-7. For the tally in Row 9 of your response,

(a) Please elaborate every reason you have for including it in Load time rather than some other time.

(b) Please provide all documentation you have available that shows that the Location should be Point of Delivery rather than Vehicle.

RESPONSE:

(a) Load time as defined in the STS categories is "Delivering and collecting mail pieces at residential and business delivery points. Also included is incidental time for customer contacts and the providing of special services". After reviewing the observers' field edits, the location should have been changed to "Point of Delivery". Based on the carrier being at the point of delivery, and this matching the definition for Load Time, I find that the record should have been changed, but was not.

(b) The observer had edited the daily print out of observations (see 1st of two attached pages). The USPS form 3999X (the 2nd attached page) shows the carrier dismounting to service 11 delivery points starting at 12:23 p.m. and ending at 12:30 p.m. These two documents show that the carrier was not in the vehicle at 12:26 as the tally shows.

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

Subject Present SP01	Subject Present	1:08	A00	WT02	S04	Resident Outside	Travel BA Divr.	LLV	K01	12:08 PM
Job Classification JC03	PTF Part Time	12:08 PM	N/A	Curb	S04	Resident Outside		LLV	K01	12:08 PM
Subject Present SP01	Subject Present	-E12 -	A00	WT02	S04	Resident Outside		H08	H08	12:14 PM
Job Classification JC03	PTF Part Time	12:14 PM	N/A	Curb	S04	Resident Outside		# 2 Box	H08	12:14 PM
Subject Present SP01	Subject Present	4:08 - 4:12	A00	WT02	S04	Resident Outside		H06	H06	12:20 PM
Job Classification JC03	PTF Part Time	12:20 PM	N/A	Curb	S04	Resident Outside		# 1 Box	H06	12:21 PM
Subject Present SP01	Subject Present	4:08 - 4:12	A00	WT04	S04	Resident Outside		1110	1110	12:26 PM
Job Classification JC03	PTF Part Time	12:26 PM	N/A	Disarmant	S04	Resident Outside		Drop to Cust	1110	12:28 PM
Subject Present SP01	Subject Present	L08	A00	WT02	S04	Resident Outside	Travel BA Divr.	R01	R01	12:34 PM
Job Classification JC03	PTF Part Time	12:34 PM	N/A	Curb	S04	Resident Outside	Travel BA Divr.	LLV	R01	12:34 PM
Subject Present SP01	Subject Present	1:12	A00	WT02	S04	Resident Outside		H06	H06	12:39 PM
Job Classification JC03	PTF Part Time	12:38 PM	N/A	Curb	S04	Resident Outside		# 1 Box	H06	12:39 PM
Subject Present SP01	Subject Present	1:12	A00	WT02	S04	Resident Outside		H07	H07	12:45 PM
Job Classification JC03	PTF Part Time	12:45 PM	N/A	Curb	S04	Resident Outside		# 1-1/2 Box	H07	12:45 PM
Subject Present SP01	Subject Present	L12	A00	WT02	S04	Resident Outside		H06	H06	12:51 PM
Job Classification JC03	PTF Part Time	12:51 PM	N/A	Curb	S04	Resident Outside		# 1 Box	H06	12:51 PM
Subject Present SP01	Subject Present	L08	A00	WT02	S04	Resident Outside		K01	K01	12:57 PM
Job Classification JC03	PTF Part Time	12:57 PM	N/A	Curb	S04	Resident Outside	Travel BA Divr.	LLV	K01	12:57 PM
Subject Present SP01	Subject Present	L08	A00	WT02	S04	Resident Outside		R01	R01	1:03 PM
Job Classification JC03	PTF Part Time	1:03 PM	N/A	Curb	S04	Resident Outside		LLV	R01	1:03 PM

OBS49 (3)over:

DATE 7/5/97 Route 8735

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

ADVO/USPS-T13-77. Please refer to your response to UPS/USPS-T13-7. If the carrier was on his route and deviated to deliver a parcel, please explain fully why the Location would then be recorded as "Other Route."

RESPONSE:

The observers had the USPS form 3999X with them at all times. The observers knew from the USPS form 3999X the intended route of the carrier. If the carrier had deviated from the expected route, the observer would have recorded "other route" due to the deviation. Typically, parcels that are delivered on a route are delivered in the sequence of the route.

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

ADVO/USPS-T13-78. For the "Central Inside" receptacle detail (Code H12), please identify the types of receptacles and/or drops that could be encompassed within that code (e.g., drop to a central mailroom, one or more banks of central receptacles, groupings of individual receptacles that could also be used as single delivery receptacles).

RESPONSE:

The "Central Inside" activities detail code H12 would refer to a group of delivery points that required an "arrow" key to open the set of boxes in most cases. The carrier would have been inside a building, typically an apartment complex, thus not having to deal with the weather. The bank of boxes could range from 4 central boxes up to 64 central boxes. There could also be several banks of boxes that require several uses of the "arrow" key. These receptacles could be top loaded, front loaded, or back loaded.

H12 should not have been used for a "drop to a central mailroom". If the carrier did drop mail at a central mailroom where the customer would then perform the distribution to his customers (which is called a "hotel - motel agreement"), or at a "Mail Boxes Etc., or retirement home, code H10, "Drop to Customer," would have been used.

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

ADVO/USPS-T13-80. In your response to MPA/USPS-T13-15, which asked you to describe how data collectors were selected and trained, you provided the following information with respect to Phase 2 data collectors:

- Three of the Phase 2 data collectors participated in Phase 1 data collections.
- Six new data collectors received on-the-job training for three weeks during the Phase 2 data collections.
- Eighteen new data collectors received on-the-job training for two weeks during the Phase 2 data collections.

With respect to this response, please answer the following:

(a) The above three categories total up to 27 data collectors. However, your response to MPA/USPS-T13-16 lists 47 data collectors (by observer code number) in Phase 2. Please state the correct total number of data collectors that participated in any part of the Phase 2 data collections.

(b) Does this mean that an additional 20 data collectors were hired sometime after the 27 identified above? If not, please indicate the correct number of additional data collectors hired.

(c) Please explain how much on-the-job training (in days or weeks) these last 20 data collectors received. If the amount varied by individual, please indicated the range of training.

(d) Are the "observer code numbers" arranged in the order of hire; e.g., do the last 20 observer code numbers correspond to the 20 last-hired data collectors in (b) above? If not, provide a list that groups observer code numbers by training category.

RESPONSE:

(a) Yes, a total of 47 data collectors participated in Phase 2.

(b) Yes, 20 data collectors were added during the Phase 2 data collection.

(c) The observers used after the initial group received 2 to 3 weeks training with two of the original 27 observers. Based on the observed ability of each individual to learn the objects to be recognized, the associated barcodes, and the techniques for operation of the equipment, the length of training needed for that individual would be determined by the OJT team. The Post Office Subject matter

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

expert and the quality control personnel would also monitor the ability of the observer(s).

(d) No. The following listing shows the date that each Phase 2 observer started:

Code	Phase 1	Phase 2	First 6	Second 18	Last 20	Date Started
OBS02	X					
OBS04	X					
OBS05	X					
OBS06	X					
OBS07	X					
OBS08	X	X				
OBS09		X	1			3/24/97
OBS10		X			14	6/30/97
OBS12	X	X				
OBS13	X	X				
OBS14		X	2			3/24/97
OBS15		X	3			3/24/97
OBS16		X	4			3/24/97
OBS17		X	5			3/24/97
OBS18		X	6			3/24/97
OBS19		X			1	4/14/97
OBS20		X			2	4/14/97
OBS21		X			3	4/14/97
OBS22		X			4	4/14/97
OBS23		X			5	4/14/97
OBS24		X			6	4/14/97
OBS25		X			7	4/14/97
OBS26		X			8	4/14/97
OBS27		X			9	4/14/97
OBS31		X			10	4/14/97
OBS32		X			11	4/14/97
OBS33		X			12	4/14/97
OBS35		X			13	4/14/97
OBS36		X			14	4/14/97
OBS37		X			15	4/14/97
OBS38		X			16	4/14/97
OBS39		X			17	4/14/97
OBS40		X			18	4/14/97
OBS42		X			1	4/28/97
OBS43		X			2	5/5/97
OBS46		X			3	5/13/97
OBS47		X			4	5/13/97

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

OBS45	X	5	5/19/97
OBS48	X	6	5/19/97
OBS49	X	7	5/26/97
OBS50	X	8	6/2/97
OBS29	X	9	6/16/97
OBS30	X	10	6/16/97
OBS28	X	11	6/30/97
OBS51	X	12	6/30/97
OBS52	X	13	6/30/97
OBS53	X	15	7/21/97
OBS54	X	16	7/28/97
OBS55	X	17	8/19/97
OBS57	X	18	12/15/97
OBS56	X	19	12/22/97
OBS58	X	20	1/12/98

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

ADVO/USPS-T13-81. With respect to the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status codes, please

(a) Confirm that, although the barcode descriptions in Appendix C (page 22) call them "route" codes, these codes relate to a delivery or set of deliveries rather than the entire route. If this is incorrect, please explain fully.

(b) Explain how these two types of codes were identified for a "Point of Delivery" location.

(c) For "Point of Delivery" location, explain where and when the information was gathered on the delivery types/delivery status for a route (i.e., was it decided as each observation was made or taken from an already filled-out form? Would it depend upon whether the carrier had an a typical delivery to make to a certain address?).

(d) For all other (Level 10) location codes, provide the information requested in (b) and (c) above.

RESPONSE:

(a) With respect to the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status codes, confirmed that these "route codes" only related to the specific delivery point being sampled, rather than the entire route.

(b) The level 11.2 outside delivery type is defined by the circumstances at the delivery point. In general, if the carrier was walking and delivering to delivery points after a park point, the delivery type is classified as park and loop. Generally, if the carrier dismounted the vehicle to deliver one or several delivery points without the satchel, the delivery point is classified as a dismount. If the carrier remained in the vehicle and serviced a mailbox from the vehicle, the delivery type generally is classified as curb. If the carrier parked the vehicle at a delivery point, obtained a satchel, and/or took trays or tubs of mail with him, and the delivery points being serviced required an "arrow" key to open the group of delivery points, the delivery type generally is

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

classified as central. If the carrier had a "walk out route," most of the delivery points serviced on the route would have been classified as a foot delivery type. The only exception I can recall to this rule would have been if the carrier on a foot route used the "arrow" key to open the central box. In this case, the delivery type would have been classified as central.

The level 11.3 codes for delivery type status were generally determined by using the USPS form 3999X. The delivery types on the form list types 1 through 4 as residential deliveries and types 5 through 8 as business deliveries. The observer would determine if the mailbox was inside (i.e., carrier is out of the weather) or outside to distinguish between inside and outside delivery type status.

(c) The USPS form 3999X was used as a guide to establish expectations regarding delivery type and delivery type status. Once at the actual delivery point, the observer, based on his observations, would select the specific delivery type and delivery type status.

(d) For the locations PBL, Dock and Gas Station the 11.2 level outside delivery type could be N/A or the next delivery type the carrier was to encounter on the route. The 11.3 level delivery type status could be N/A or the next delivery type status the carrier was to encounter next on his route. The 11.3

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

level delivery type status recorded whether the carrier was inside or outside at business or residential deliveries.

For the locations On Route, Vehicle, In Vehicle Stopped, In Vehicle Traffic, and Wait While Walking, the 11.2 and 11.3 levels could be N/A if the carrier's travel path was returning to unit, moving the vehicle to load, loading at the unit, traveling to lunch, or to other places where the carrier is not associated with a delivery type. The 11.2 level for the above locations could also be associated with any of the five outside delivery types the carrier was about to encounter next on the route. Please note that on some foot routes the carrier rides in another carrier's vehicle to get to the route's first delivery. In this case the location would be vehicle, the delivery type foot, and the delivery type status N/A.

For the Park Point location, most 11.2 delivery types will be Park and Loop. For the Park Point location, any of the five delivery type status codes (11.3) might apply. Most of the activities that are occurring at the Park Point are setup, loading or unloading the vehicle. A Park Point also occurs at central deliveries. A Park Point is also associated with some of the 11.3 delivery type status codes recorded as dismount in 11.2. If the USPS form 3999X lists the park point, but the carrier delivered the mail as a dismount, the observers would have recorded this as a Park Point with a dismount delivery.

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

For the location shown as collection box, all 11.2 level codes could apply. The most common is dismount. Several routes were studied that ended in an hour or two of collections. The carrier would pull up to the collection box and dismount to service the box. All five of the level 11.3 delivery type status codes could apply depending on the location of the collection box (inside, outside, residential or business).

The relay box location was primarily used with the 11.2 delivery type of foot route, with 11.3 delivery type status based on the location of the box (inside, outside, residential or business). There were several occasions where a carrier on another route was assigned to drop a relay bag for another carrier before delivering the park and loop portion of his own route. When this occurred, the observers would have known this was a stop on the loop, and recorded the 11.2 level as park and loop. A similar situation could occur if the carrier, while making curb deliveries along his route, dismounted to drop a relay bag for another carrier. This would generally be recorded as a dismount.

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

ADVO/USPS-T13-82. Please refer to the PS Form 3999X "Examination of Letter Carrier Worksheet" presented in Appendix E to your testimony.

(a) Please provide the route observers' definitions of the following delivery types from Form 3999:

Type 1 residential deliveries
Type 2 residential deliveries
Type 3 residential deliveries
Type 4 residential deliveries
Type 5 business deliveries
Type 6 business deliveries
Type 7 business deliveries
Type 8 business deliveries

(b) For each of the delivery types in (a), please provide any systematic instructions provided to the observers with respect to the type of receptacles or other delivery conditions that might be expected.

RESPONSE:

(a) Type 1 residential deliveries are residential deliveries that fall into a category the USPS refers to as "other", that is the deliveries are not curb, central or NDCBU (Neighborhood Delivery Collection Box Unit). Typically, single delivery points served by walking and delivered from a satchel or as a dismount.

Type 2 residential deliveries are the residential curb type deliveries. Typically, one or more rural boxes that are served while remaining in the vehicle.

Type 3 residential deliveries are the neighborhood delivery collection box unit (NDCBU) type deliveries. These boxes are typically located outside, are owned by USPS, have larger openings than the older central boxes, can be accessed from the back or may swing to open.

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

Type 4 residential deliveries are the residential central type deliveries. The customer owns the boxes, typically inside serving multiple apartments, usually accessed from the front after opening with an arrow key.

Type 5 business deliveries are business deliveries that fall into a category the USPS refers to as "other", that is the deliveries are not curb, central or NDCBU (Neighborhood Delivery Collection Box Unit). Typically single delivery points served by walking and delivered from a satchel or as a dismount.

Type 6 business deliveries are the business curb type deliveries. Typically, one or more rural boxes that are served while remaining in the vehicle.

Type 7 business deliveries are the business neighborhood delivery collection box unit (NDCBU) type deliveries. These boxes are typically located outside, are owned by USPS, have larger openings than the older central boxes, can be accessed from the back or may swing to open. Some malls may have a group of NDCBU's located inside.

Type 8 business deliveries are the business central type deliveries. The customer owns the boxes, typically inside serving multiple businesses, usually accessed from the front after opening with an arrow key.

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

(b) It is important to note, at the outset, that the study was designed so that there would be no need for complicated instructions for observers. Once the observers were made familiar with the materials they would use, the observers were simply instructed to record what they saw. These observations were recorded by selecting from among a pre-defined hierarchy of alternatives relating to carrier activities that might take place at the particular points at which the observations were made. The data collection phase allowed for complete coverage of the carrier's workday. If any unusual situation occurred, the observer made a comment on the comments log, and/or video-taped the situation for review with the Subject Matter Expert, Quality Assurance personnel or the Data Coordinators. During on-the-job training, the observers viewed a number of videotapes that showed various types of receptacles. They were also provided with the materials in Library Reference LR-I-220, which contains pictures of receptacles.

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

ADVO/USPS-T13-83. Provide a cross-tabulation of the delivery type/delivery type status codes with the Form 3999 data you collected in the format shown below:

Delivery Status	Delivery type	Res Type 1	Res Type 2	Res Type 3	Res Type 4	Bus Type 5	Bus Type 6	Bus Type 7	Bus Type 8
Residential Outside	Central								
	Curb								
	Dismount								
	Foot								
Residential Inside	Park&Loop								
	Central								
	Curb								
	Dismount								
Business Outside	Foot								
	Park&Loop								
	Central								
	Curb								
Business Outside	Dismount								
	Foot								
	Park&Loop								
	Central								

RESPONSE:

I will attempt to respond as fully as possible to this question. First, however, it must be noted that the data were not collected in a fashion that would permit the requested cross-tabulation. The work sampling tallies that contain the Delivery Status and Delivery type were not designed to allow for entry of the USPS form 3999X delivery types one through eight. This data is available separately and is provided below.

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

It should also be noted that not all tallies contain the Delivery Status.

Approximately 4000 tallies are in the database as "N/A". The reasons for the "N/A" entries vary, depending on whether the carrier was on a break, taking personal time, loading or unloading the vehicle, traveling to the first delivery or returning to the unit and many many more activities that the carrier performs that are not associated with the Delivery Status.

Third, it must be noted that the delivery status was a minor piece of the total data collection. The delivery status was not used in any portion of the Engineered Standards or data analysis performed on the data collected.

With that said, I can provide the following information.

Delivery Status	Delivery Type	Tallies
Residential Outside	Central	4243
	Curb	12699
	Dismount	3997
	Foot	765
	Park & Loop	7226
Residential Inside	Central	1197
	Curb	3
	Dismount	38
	Foot	54
	Park & Loop	125
Business Outside	N/A	1
	Central	400
	Curb	21
	Dismount	1068
	Foot	53
Business Inside	Park & Loop	269
	Central	291

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

	Curb	8
	Dismount	1628
	Foot	169
	Park & Loop	525
N/A	Central	614
	Curb	1803
	Dismount	781
	Foot	130
	Park & Loop	727
	N/A	21

The data used by witness Baron contained:

Residential Type 1	88862
Residential Type 2	144876
Residential Type 3	59898
Residential Type 4	59101
Business Type 5	18369
Business Type 6	4126
Business Type 7	4088
Business Type 8	5509

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

ADVO/USPS-T13-84. With respect to LR I-220 (Engineered Standards Book of Forms/Pictures) and LR I-221 (Engineered Standards Book of Barcodes), please confirm:

(a) There are a number of photographs of mail equipment and mail receptacles in LR I-220, but, with the possible exception of "gang box," there are no photographs or other graphics that specifically identify a receptacle type as it relates to a receptacle type description or (Level 11.4.1, Delivery Details H) code, as described in the barcode book.

(b) There are no photographs in LR I-220 that explicitly identify with or relate to any Level 10 Location or Level 11.4 Outside Activity codes, as described in the barcode book.

RESPONSE:

(a) Confirmed. The observers were instructed on the job by the USPS Subject Matter Expert, participants that were performing data collection, and the Quality Control (QC) staff. During on-the-job training (OJT), observers would have viewed USPS training videos and or other videos with the USPS Subject Matter Expert, who would identify the various types of delivery receptacles, along all other pertinent work sampling selections. The NDCBU deliveries and central deliveries are clearly defined in the Library Reference LR I-220. The other receptacle types were defined in the OJT instruction.

(b) Confirmed. The observers were instructed on the job by the USPS Subject Matter Expert, participants that were performing data collection, and the QC staff. During the OJT observers would have viewed USPS training videos and/or other videos with the USPS Subject Matter Expert, who would identify the various Level 10 Locations or Level 11.4 Outside Activity codes, along all other pertinent work sampling selections. It should be noted that certain locations, such as the

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

loading dock, are so easy to identify that it was not necessary to include photos specifically of them. In such cases, these readily-identified locations were included in photos of other items. Even where obvious, and when no specific picture was included, observers still received instruction regarding these locations in conjunction with instruction regarding use of the bar code sheets and scanners.

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

ADVO/USPS-T13-85. Please refer to your Appendix A, "Delivery - Basic," which provides a flowchart of carrier activities and route characteristics that were used to develop the barcode method.

(a) By barcode method, do you mean the work/activities sampling process or did the barcode method extend to other projects your organization was also performing (i.e., the time studies, methods analyses)? Please explain.

(b) Were flowcharts such as these given to the data collectors/observers as part of their training process (e.g., something like this was included in LR I-220, the Engineering Standards Book of Forms/Pictures)? Please explain.

(c) Please confirm that the code numbers on the flowchart in Appendix A were not included in the barcode information in your Appendix C or anywhere else in your testimony, but were only provided later when you filed LR I-221. If this is incorrect, please explain.

RESPONSE:

(a) The barcode method referred to is used in a broad sense, that is, it applied to uses beyond just the work sampling. Levels 1 through 13 covered more than just the work sampling. Please refer to Library Reference LR-I-221 for all barcodes used in the study. The barcode method was also used in inputting other data items for analysis. An example would be time study data extracted from videotapes used for method analysis and validation of the MOST® predetermined time system.

(b) Yes, the observers were provided with a complete set of flow charts. The Library Reference LR I-221 material, as well as verbal instruction from the USPS Subject Matter Expert and participants in the data collection design phase also formed part of the instruction. USPS work methods videos were also used in

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

training observers to recognize various USPS methods to be captured by the bar code scanning method.

(c) Confirmed, the code numbers that are included in Appendix A are the codes used for time studying the activities listed in the flowchart. These were not included in Appendix C because they were not relevant to the work sampling which is the subject of my testimony.

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

ADVO/USPS-T13-86. Please refer to your Appendix A, "Delivery - Basic," which provides a flowchart of carrier activities and route characteristics that were used to develop the barcode method.

(a) Please confirm that for Central Inside, Central Outside, and Dismount deliveries there are no words or codes describing the carrier activities of walking to and from vehicle (at a park point) or between delivery points. If this is incorrect, please explain fully.

(b) Please confirm that for Park & Loop deliveries there are no words or codes describing the carrier activities of walking to and from vehicle (at a park point), along route, or between delivery points. If this is incorrect, please explain fully.

(c) Please confirm that for Foot deliveries there are no words or codes describing the carrier activity of walking to or from relay point, along route, or between delivery points. If this is incorrect, please explain fully.

(d) Please confirm that for any delivery type, there are no words or codes describing the carrier activity of walking from a routine delivery point to make a special delivery of an accountable or parcel. If this is incorrect, please explain fully.

If you cannot confirm any of the above, please explain why not.

RESPONSE:

(a-b) Confirmed, that on the Appendix A Delivery Basic that for Central Inside, Central Outside, Dismount deliveries, and Park and Loop there are no words or codes describing the carrier activities of walking to and from vehicle (at a park point) or between delivery points, the words or codes do not appear on the flowchart. It was not the intent of this flow process chart to identify the work sampling codes, but to define the boundaries of the time study groupings. The work sampling data collection method used the T05 code for walking when the carrier was traveling to or from the vehicle with no mail, satchel or parcel.

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

(c) The words "Foot deliveries" as stated in your question do not appear on the flow chart. Walking DT13 does appear on the sheet, and the first box in the flow process contains the words "Walk to Del point". There are no additional words or codes describing the carrier activity of walking to or from relay point, along route. It was not the intent of this flow process chart to identify the work sampling codes, but to define the boundaries of the time study groupings.

(d) Confirmed, that for any delivery type, there are no words or codes describing the carrier activity of walking from a routine delivery point to make a special delivery of an accountable or parcel.

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

ADVO/USPS-T13-87. With respect to the Videx TimeWand II scanner, please provide the following:

- (a) The program listing and all programming documentation for the scanner.
- (b) Identification of whether the individual who programmed the scanner was you, a regular employee of your firm, or some other individual.
- (c) Full information on whether the scanner was programmed so that certain codes could not be used with certain other (incompatible) codes.
- (d) Confirmation that once the Videx II scanner's data file was opened (for an observation), the scanner would permit codes only in hierarchical order (i.e., a higher level code could not precede a lower level code). If this is incorrect, please explain.
- (e) Confirmation that the Videx II scanner would not permit a level from being omitted during an observation. If this is incorrect, please explain.
- (f) Confirmation that the Videx II scanner would prompt the data collector (on the LCD) for each Level's scan, if this is incorrect, please explain. Information on precisely when the scanner's data file was opened and the clock reading was made (was it right after it beeped or when the data collector scanned the first barcode?).
- (g) The estimated time required by the data collector to scan one full observation.

RESPONSE:

(a) The programming of scanner is an interactive process that does not yield a listing such as with a Fortran program or the like. No programming documentation exists other than a TimeWand II Application Builder manual, that was used to build an Access module that was used to program the wands. This manual will be filed shortly as a library reference. This Access module was among the items made available for inspection at the technical conference held on April 6, 2000, pursuant to Presiding Officer's Ruling No. R2000-1/27.

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

(b) The original software/data collection hierarchy was programmed by a regular employee of my firm. The scanners were programmed automatically in the field when the observers did their "upload/download" of data. The software used for the study provided the communication to "upload" the program to the wands and "download" or retrieve the data collected from the wands.

(c) The scanner programming requires that the barcode hierarchy be followed. The scanner will not accept bar codes that are not listed in the level being scanned.

(d) Confirmed, the scanner requires the observer to use the data collection hierarchy.

(e) Confirmed, the scanner programming requires the observer to proceed from level 10 through level 11.4.1.

(f) Confirmed, the scanner LCD screen prompted the observer. The time recorded in the data record is the time the barcode is physically scanned.

(g) The observer could complete the level 10 through 11.4.1 scan sequence in approximately 5 to 20 seconds.

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

ADVO/USPS-T13-89. For the team of two individuals that collected data for a route-day, please explain:

(a) Were all "Study" and "Work Sample" data (indicated as requiring collection in LR I-221) input into the same Videx TimeWand II scanner or were both individuals on the team scanning different kinds of data on two separate scanners during the day?

(b) Were the Level 9 (Inside and Outside) event quantities (indicated as requiring collection in LR I-221) physically counted by the individual with the Videx TimeWand II scanner or by the other individual?

(c) Were any other data (not included as barcodes in LR I-221) also being scanned into the same Videx TimeWand II scanner that was being used to scan the work/activity sampling data? If so, please identify and explain.

(d) Did the individuals on the team sometimes switch assignments over the course of a day? If so, and there was some routine involved, please explain fully.

(e) Were the data collectors involved in timing any activities during the data collection? If so, please explain what activities were timed, how those activities were timed, and how the information was recorded.

RESPONSE:

(a) The intent was for only one observer to be responsible for all scanning with all of the data being entered into one wand. The other observer was obtaining quantity information, driving the car used in following the carrier, videotaping or performing other observations required. On rare occasions more than one wand was used in a day, when it became necessary to replace the initial wand, due to battery failure, for example. The observations scanned did not overlap.

(b) The level 9 event quantities were associated with the time study that was taking place. Some of the time studies required very little quantity data. In these

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

cases the quantity data was collected and entered by the observer scanning.

Other time studies required a greater amount of quantity data. In these cases, the other observer helped collect this information.

(c) Library Reference LR-I-221 contains all the barcodes used in this portion of the study.

(d) Observers did infrequently switch places. I do not believe this took place with any regular routine. Typically an observer did the scanning for the whole day. The observers that did switch assignments should have gone back to level 1 and changed the observer code to their own code.

(e) The scanner, by putting a time and date stamp on every barcode scanned, allows for the study software to calculate the event being time studied. The level 8 in Library Reference LR-I-221 shows the events that were time studied. Please refer to ADVO/USPS-T13-98 (b) for a complete list of events time studied.

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

ADVO/USPS-T13-90. With respect to LR USPS I-221 (Engineered Standards Book of Barcodes), please provide the following:

- (a) A confirmation that these are all the barcodes used in the activity sampling project. If they are not, please provide all the barcodes.
- (b) A confirmation that the barcodes on the second page of codes are the Level 7 codes. If this is not correct, please explain and provide the Level 7 codes.
- (c) A full explanation of and definitions for the barcodes on the second page of the barcode book.
- (d) For each barcode, identify and explain:
 - (i) whether it was used to develop work/activity-sampling data (regardless of whether the data are included in LR I-163) data for some other purpose, or data for multiple purposes.
 - (ii) whether it would be scanned by the individual with the Videx II scanner and collecting the work/activity sampling data, or by another individual handling another scanner (collecting something other than activity sampling data).

RESPONSE:

(a) Confirmed, the barcodes in Library Reference LR-I-221 were all the barcodes used in the activity sampling portion of the study, including both work sampling and time studies and quantitative data collection.

(b-c) Level 7 is the entry of the odometer reading numbers. This quantitative data is unrelated to the work sampling that is the subject of my testimony. The page of number barcodes is for the level 8 time study. The number is used to uniquely identify the time study event. The unique number is used by the study software to calculate the time duration of the time study. The software uses the

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

**"STT" code time stamp and the "FIN" time stamp to calculate the amount of time
between.**

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

(d)(1)

Data Description Bar Code Description Bar Code Comments

1 thru General					
7	Observer	OBS01	Multiple purposes		
2	State	CA	California	Multiple purposes	
3	Unit	CY01 CY02 CY03 CY04	Multiple purposes Multiple purposes Multiple purposes Multiple purposes		
3.1	Route Number	Entry	Multiple purposes	Keyed entry of 4 digits	
4	Subject Job	JC01 JC02 JC03 JC04 JC05	Regular Carrier Utility Carrier PTF Part Time Temporary Employee Casual	Multiple purposes Multiple purposes Multiple purposes Multiple purposes Multiple purposes	
5	Subject Present	SP01 SP02	Subject is Present End of Subject Study	Multiple purposes Multiple purposes	Scan when subject is first sighted, ontime or late
6	Mileage	M01 M02	Mileage - N/A Enter Odometer Numbers	Multiple purposes Multiple purposes	Total mileage traveled at end of the day
8	Time Study	0000 0001	Not Applicable Events	Used for time study Used for time study	Events 0001 to 9999
8.1	Event Number	0000 0001	Not Applicable Events	Used for time study Used for time study	Events 0001 to 9999
8.2	Event Status	STT FIN INT RES NAA	Start Finish Interrupted Resumed Not Applicable	Used for time study Used for time study Used for time study Used for time study Not Applicable	Starts task timing function Finish task timing Interrupted task timing Resume task timing
8.3	Task Type	TT00 PT01 PT02 PT03 PT04	N/A AM Letters AM Flats AM Accountable AM Parcels	Used for time study Used for time study Used for time study Used for time study Used for time study	Not Applicable Inside letters handled in the AM Inside flat mail handled in the AM Inside accountables handled in the AM Inside parcels handled in the AM

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

	PT05	AM Mix	Used for time study	Inside Mixed Mail handled in th AM
	PT06	AM Admin	Used for time study	AM Administrative functions an Inside and Outside Clock
	PT07	PM Letters	Used for time study	Inside letters handled in the PM
	PT08	PM Flats	Used for time study	Inside flat mail handled in the P
	PT09	PM Accountable	Used for time study	Inside accountables handled in the PM
	PT10	PM Mix	Used for time study	Inside Mixed Mail handled in th PM
	PT11	PM Admin	Used for time study	PM Administrative functions an Inside Clock at end of day
Delivery Type Reference counts to Business and Residential Deliveries	DT12	Curb	Used for time study	Curbside delivery
	DT13	Foot/Walking	Used for time study	Walking route delivery
	DT14	Dismount	Used for time study	Dismount delivery
	DT15	Central / Inside	Used for time study	Apartment type delivery inside
	DT16	Park and Loop	Used for time study	Park and Loop delivery
	DT17	Central / Outside	Used for time study	Condominium delivery outside
	DT18	VIM Room	Used for time study	Vertical Improved Mail delivery
	Transportation Type	TT19	Jeep	Used for time study
TT20		LLV	Used for time study	
TT21		1 or 2 Ton Truck	Used for time study	
TT22		Pickup Truck	Used for time study	
TT23		Walking - Push Cart	Used for time study	
TT24		Bike	Used for time study	
TT25		Bus - Public	Used for time study	
TT26		Automobile	Used for time study	
TT27		Elevator - Passenger	Used for time study	
TT28		Walking	Used for time study	
TT29		Train - Public	Used for time study	
8.4 Tasks Inside Tasks Yxx	Y00	Not Applicable		
	Y01	Clock (inside)	Used for time study	Start at clock in - fin at clock out
	Y02	Withdrawal / Return	Used for time study	Walk - pull case, drop off missorts and return
	Y03	Sort or Case	Used for time study	Sort letters or flats into case
	Y04	AM/PM Admin	Used for time study	Deposit 3849, Return Parcel, DPS error report
	Y05	Hot Case	Used for time study	Travel, pull, p/u hamper and return
	Y06	COA	Used for time study	All functions w/ Change of Address
	Y07	Pull Down	Used for time study	Pull down letter or flat case, banc and load, setup relay
	Y08	Hot Case and Exit	Used for time study	Trvl to hot case, pull, seq., p/u DPS & clock out
Outside Tasks Pxx	P00	Clock (outside)	Used for time study	Start at clock out - fin at clock in

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

	P01	Basic	Used for time study	Delivery of mail during route
	P02	Accountable	Used for time study	Delivery of accountable w/i loop
	P03	Dismount Accountable	Used for time study	Delivery of accountable on curb / dismount route
	P04	LVR Accountable	Used for time study	Delivery of LVR w/i loop or dismount
	P05	Parcel	Used for time study	delivery of Parcel w/i loop
	P06	Dismount Parcel	Used for time study	Delivery of Parcel on curb route
	P07	Relay Restock	Used for time study	Reloading satchel on walking or park & loop
	P08	Unload - Setup Central	Used for time study	Unloading Vehicle during delivery route
	P09	Setup - vehicle	Used for time study	Re-arrange vehicle
	P10	Collection	Used for time study	Unloading collection box at street or apt.
Transportation Tasks Vxx	V01	Vehicle Inspection	Used for time study	Travel, inspect, Report and return
	V02	Load Vehicle	Used for time study	Travel, load and return hamper
	V03	Travel to 1st delivery	Used for time study	Vehicle moving to vehicle stop at 1st park point
	V04	Refueling	Used for time study	Vehicle stop at station to moving to route
	V05	Travel Between Points	Used for time study	Vehicle moving to vehicle stop at park point
	V06	Return to Unit	Used for time study	After last delivery and return to unit
	V07	Unload Vehicle	Used for time study	Unload raw mail and undelivere parcels

9	Event Quantities			New level - Loop as often as needed
Counts for Mail Type	PC00	Not Applicable	Used for time study	Use this code to bypass to Work sampling
	PC01	Accountables	Used for time study	Number of accountables received
	PC02	Parcels	Used for time study	Number of parcels received
	PC03	Letters	Used for time study	Number of letters cased or withdrawn
	PC04	Flats	Used for time study	Number of flats cased or withdrawn
	PC05	Withdrawals	Used for time study	Number of passes made at withdrawal case
	PC06	Forms	Used for time study	Number of forms filled out in timing block
	PC07	Folded Flats	Used for time study	Number of Flats folded and sorted
	PC08	Delivery Points	Used for time study	Number of slots in case operation
	PC09	COA's	Used for time study	Number of Change of Address made
	PC10	Bends at Case	Used for time study	Number of Bends made by carrier in timing block
	PC11	Feet of mail	Used for time study	Number of trays placed in hamper after pulldown

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

	PC12	DPS	Used for time study	Number of trays of DPS Mail
	PC13	UBBM Quantity	Used for time study	Number of pcs of mail to UBBM throw to Tub
	PC14	Pulldown Bundles	Used for time study	Number of bundles generated at pulldown
	PC15	Paces Vehicle Inspection	Used for time study	Number of Paces used in inspecting Vehicle
	PC16	Missorts/CMUs	Used for time study	Number of pieces of mail the carrier places on the ledge while sorting - to be handled later
	PC17	Sequenced Flats	Used for time study	Number of Flats in delivery sequence
Counts for Delivery Type				
	DC01	Paces Inside	Used for time study	Number of paces in basic delivery timing block inside a building
	DC02	Paces Outside	Used for time study	Number of paces in basic delivery timing block outside on flat ground
	DC03	Paces Outside Obstructed	Used for time study	Number of paces in basic delivery timing block outside with obstructions or stairs
	DC04	Bends - Weighted	Used for time study	Number of bends made in delivery timing block w/ Loaded Satchel
	DC05	Bends - Unweighted	Used for time study	Number of bends made in delivery timing block w/o Satchel
	DC06	Doors / Gates	Used for time study	Number of doors opened in delivery timing block
	DC07	Forms	Used for time study	Number of forms filled out in delivery timing block
	DC08	Residential delivery points	Used for time study	Number of residential delivery points in delivery timing block
	DC09	Bundles	Used for time study	Number of bundles carrier method used
	DC10	Customer Interaction	Used for time study	Number of customer interactions in delivery timing block
	DC11	Pickups	Used for time study	Number of collections made in delivery timing block
	DC12	Dismounts	Used for time study	Number of dismounts required in delivery timing block
	DC13	Illegal Boxes	Used for time study	Number of illegal boxes in delivery timing block
	DC14	Business delivery points	Used for time study	Number of business delivery points in delivery timing block
	DC15	Missed delivery points	Used for time study	Number of delivery points skipped in delivery timing block
	DC16	Screen / Storm Doors	Used for time study	Number of Screen or Storm doors opened in delivery timing block
	DC17	Trays/Tubs unloaded	Used for time study	Number of trays and tubs unloaded at the end of day

Counts for Transportation Type

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

	TC01	Miles	Used for time study	Number of miles between park points
	TC02	Park Points	Used for time study	Number of park points in Park & Loop route
9.1	Quantity		Used for time study	Numeric entry of quantity for selected event

10	Work Sampling			
10	Location - Inside	L00	Not Applicable	Used for work sampling
		L01	Distribution Case	Used for work sampling
		L02	Hot Case	Used for work sampling
		L03	Work Station	Used for work sampling
		L04	Accountable Cage	Used for work sampling
		L05	Parcel Area	Used for work sampling
		L06	DPS Area	Used for work sampling
		L16	Other Work Station	Used for work sampling
		L18	In unit on route to	Used for work sampling
		L22	Time Clock	Used for work sampling
		L23	Throwback Case	Used for work sampling
		L24	In unit walking	Used for work sampling
	Location - Outside			
		L07	Dock	Used for work sampling
		L08	Vehicle	Used for work sampling
		L09	Park Point	Used for work sampling
		L10	Collection Box	Used for work sampling
		L11	Relay Box	Used for work sampling
		L12	Point of delivery	Used for work sampling
		L13	On Route	Used for work sampling
		L14	PBL	Used for work sampling
		L15	Misc	Used for work sampling
		L17	Gas Station	Used for work sampling
		L19	In vehicle at Stop/Light	Used for work sampling
		L20	In vehicle in traffic	Used for work sampling
		L21	Waiting while walking	Used for work sampling
		L22	Time Clock	Used for work sampling
11.1	Personal	A00	Not Applicable	
		A01	Subject Personal	Used for work sampling
		A02	Subject Break	Used for work sampling
		A03	Subject Lunch	Used for work sampling
		A04	Observer Personal	Used for work sampling
	Non-Job Admin	B01	Safety Meeting	Used for work sampling
		B02	Service Meeting	Used for work sampling
		B03	Awards Meeting	Used for work sampling

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

Job Admin	B04	Union	Used for work sampling
	B05	Training	Used for work sampling
	C01	Survey	Used for work sampling
	C02	Forms	Used for work sampling
	C03	Supervisor Instructions	Used for work sampling
	C04	Carrier Markup & Recond.	Used for work sampling
	C05	Other - specify	Used for work sampling
	C06	Vehicle Inspection	Used for work sampling
11.2 Delivery Type (new)	WT00	Not Applicable	
	WT07	Inside	Used for work sampling
	WT01	Foot	Used for work sampling
	WT02	Curb	Used for work sampling
	WT03	Park & Loop	Used for work sampling
	WT04	Dismount	Used for work sampling
	WT05	Central	Used for work sampling
	WT06	Vim Room	Used for work sampling
11.3 Delivery Type Status	S00	Not Applicable	
	S01	Business Inside	Used for work sampling
	S02	Business Outside	Used for work sampling
	S03	Residential Inside	Used for work sampling
	S04	Residential Outside	Used for work sampling
11.4 Activities	T00	Not Applicable	
	T01	Travel to 1st Delivery	Used for work sampling
	T02	Travel b/t Delivery	Used for work sampling
	T03	Travel b/t with Sort	Used for work sampling
	T04	Return to Unit	Used for work sampling
	T05	Walking	Used for work sampling
	F01	Accountable	Used for work sampling
	F02	Parcel	Used for work sampling
	F03	Hardship	Used for work sampling
	D08	Delay - Provide details	Used for work sampling
	J01	Letters	Used for work sampling
	J02	Flats	Used for work sampling
	J03	Accountables	Used for work sampling
	J04	Parcels	Used for work sampling
	J05	DPS	Used for work sampling
	J06	Mix	Used for work sampling
	J07	Folded Flats	Used for work sampling
	J08	Delivery / Collect	Used for work sampling Provide details for Box type next level 11.4.1
	J09	Loading	Used for work sampling Vehicle or Satchel in the AM

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

	J10	Unloading	Used for work sampling	Vehicle at the end of the day
	J11	Setup	Used for work sampling	Rearranging vehicle or satchel during the day
	D01	No Access to Box	Used for work sampling	
	D02	Vehicle Breakdown	Used for work sampling	
	D03	Mail Processing	Used for work sampling	
	D04	Weather	Used for work sampling	
	D05	Traffic/Detour	Used for work sampling	
	D06	No Work	Used for work sampling	
	D07	Other	Used for work sampling	
11.4.1 Activity Detail (new)	H00	Not Applicable		
	K00	Jeep	Used for work sampling	
	K01	LLV	Used for work sampling	
	K02	1 or 2 ton truck	Used for work sampling	
	K03	Pickup / Van	Used for work sampling	
	K04	Walking - Push Cart	Used for work sampling	
	K05	Bike	Used for work sampling	
	K06	Bus - Public	Used for work sampling	
	K07	Automobile	Used for work sampling	
	K08	Elevator - Passenger	Used for work sampling	
	K09	Walking inside unit	Used for work sampling	
	K10	Walking Outside on flat	Used for work sampling	
	K11	Walking Outside Obstructed	Used for work sampling	
	K12	Train - Public	Used for work sampling	
	E01	Sort	Used for work sampling	
	E02	PullDown	Used for work sampling	
	E03	Mat'l Handling	Used for work sampling	
	E04	Loop and Fan	Used for work sampling	
	E05	Letter sort empty	Used for work sampling	Sorting letters into an empty case slot
	E06	Letter sort partial	Used for work sampling	Sorting letters into a case slot with 1 or 2 letters
	E07	Letter sort medium	Used for work sampling	Sorting letters into a case slot with 3 or more letters
	E08	Letter sort full	Used for work sampling	Requires 2 hands to insert a letter into a slot
	E09	Flat sort vertical	Used for work sampling	
	E10	Flat sort horizontal	Used for work sampling	
	E11	Flat sort sequenced	Used for work sampling	
	H01	Illegal Mail Box	Used for work sampling	
	H02	1 Handed Slot	Used for work sampling	
	H03	2 Handed Slot	Used for work sampling	
	H04	Slot below knees	Used for work sampling	
	H05	Flat Receptacle	Used for work sampling	
	H06	#1 Box	Used for work sampling	
	H07	# 1-1/2 Box	Used for work sampling	

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

	H08	#2 Box	Used for work sampling	
	H09	1 Handed Slam	Used for work sampling	
	H10	Drop	Used for work sampling	
	H11	Gang Box	Used for work sampling	
	H12	Central Inside	Used for work sampling	
	H13	Central Outside	Used for work sampling	
	H14	VIM Room	Used for work sampling	
	G01	Public Relations	Used for work sampling	Number of words limited
	G02	Service Rates	Used for work sampling	
	G03	Directions	Used for work sampling	
	G04	Excessive words Customer	Used for work sampling	Customer delays carrier to chat
	G05	Excessive words Carrier	Used for work sampling	
	I01	Parking Unavailable	Used for work sampling	
	I02	Dogs	Used for work sampling	
	I03	Railroad Crossing	Used for work sampling	
	I04	Drawbridge	Used for work sampling	
	I05	Union	Used for work sampling	
	I06	Construction	Used for work sampling	
	I07	Weather	Used for work sampling	
	I08	Stuck in traffic	Used for work sampling	
12	Beeper Occurances	Carrier has a pager	Multiple purposes	Numeric entry of pager occurrences during the day

13	Study Quantities			
13	Item	R01	Temperature	Multiple purposes Scan to input temperature at prescribed time
		R02	Humidity	Multiple purposes Scan to input humidity at prescribed time
		R03	Wind	Multiple purposes Scan to input wind speed at prescribed time
		R04	Rain	Multiple purposes Scan to input rain at prescribed time
		R05	Snow	Multiple purposes Scan to input snow at prescribed time
		R06	Bundle method	Multiple purposes Scan to input carrier delivery method of bundles handled
		R07	Park Points per 1621	Multiple purposes Scan to input number of park points allowed on route
		R08	Hail	Multiple purposes Scan to input if hailing
		R09	Qty of DPS	Multiple purposes
		R10	Am Qty of letters	Multiple purposes
		R11	Am Qty of flats	Multiple purposes
		R12	Carrier height in inches	Multiple purposes
		R13	Carrier Age	Multiple purposes
		R14	Carrier Outseam	Multiple purposes
		R15	Smoker	Multiple purposes
		R16	Right or Left handed	Multiple purposes Scan code and enter 1 in qty Scan code and enter 1 for right, 2 for left

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

R17	Gender	Multiple purposes	Scan code and enter 1 for male, 2 for female
R18	Qty of Parcels	Multiple purposes	
R19	Qty of accountables	Multiple purposes	
R20	Carrier weight in pounds	Multiple purposes	
R21	Carrier forward reach in inches	Multiple purposes	
R23	Distance to clock	Multiple purposes	Paces to clock from carrier case
R24	Distance to Accountable Cage	Multiple purposes	Paces to Accountable cage from case
R25	Distance to hotcase	Multiple purposes	Paces to hotcase from carriers case
R26	Distance to Parcel hamper	Multiple purposes	
R27	Distance to Throwback case	Multiple purposes	
R28	Distance to Vehicle	Multiple purposes	
R29	Vehicle relocation to dock	Multiple purposes	
R30	Distance to dist. case 1	Multiple purposes	
R31	Distance to dist. case 2	Multiple purposes	
R32	Distance to dist. case 3	Multiple purposes	
R33	Distance to dist. case 4	Multiple purposes	
R34	Distance to dist. case 5	Multiple purposes	
R35	Distance to VIM hamper	Multiple purposes	
R36	Distance to Breakroom	Multiple purposes	
R37	Distance to Restroom	Multiple purposes	
R38	Distance to Supervisors Desk	Multiple purposes	
R39	Distance to 1st swinging exit door	Multiple purposes	
R40	Quantity of SPR's	Multiple purposes	
R41	Quantity of DAL cards	Multiple purposes	
R42	Quantity of pre sequenced mail	Multiple purposes	
R43	Method 3+1 used	Multiple purposes	
R44	Quantity UBBM	Multiple purposes	
R45	Quantity of Missorts	Multiple purposes	
R48	3999 Type 1	Multiple purposes	
R49	3999 Type 2	Multiple purposes	
R50	3999 Type 3	Multiple purposes	
R51	3999 Type 4	Multiple purposes	
R52	3999 Type 5	Multiple purposes	
R53	3999 Type 6	Multiple purposes	
R54	3999 Type 7	Multiple purposes	
R55	3999 Type 8	Multiple purposes	
R56	Weight of empty satchel	Multiple purposes	
R57	Weight of loaded satchel	Multiple purposes	
R58	DPS out of sequence	Multiple purposes	
R59	DPS missorted to route	Multiple purposes	
R60	Quantity of delivery points given away	Multiple purposes	

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

	R61	Number of trays used	Multiple purposes	
	R62	Number of tubs used	Multiple purposes	
13.1	Quantity		Multiple purposes	Numeric entry relating to scan at 13

(d)(ii) Only one scanner is used at a time. The observers had several barcode scanners with them through the day. The additional scanners are carried as backups should a scanner be damaged or the battery run low.

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

ADVO/USPS-T13-91. In LR USPS I-221 (Engineered Standards Book of Barcodes), Level 6 is a scan for the starting odometer reading on the delivery vehicle.

(a) Was this intended to be entered at the start of each route-day? Please explain.

(b) Was there also a scan for the odometer reading at the end of the day? Please identify.

RESPONSE:

Note that the quantity data at issue in this question is unrelated to the work sampling that is the subject of my testimony.

(a) The observers had the option to enter this data at the start of the day, or to write the odometer reading on the comment sheet and then at the end of the day enter both the starting and ending odometer readings.

(b) By scanning the Level 6 code at anytime allowed for entry of the odometer reading. Later, during the analysis portion of the project, the mileage was calculated.

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

ADVO/USPS-T13-92: With respect to the codes in LR USPS I-221 (Engineered Standards Book of Barcodes),

(a) There are two page 3s one is for the "Inside Study" and the other is for the "Outside Study." Please confirm that the data relating to these barcodes were used to develop the Work Standards. If this is incorrect, please explain what these data were used for.

(b) There are two page 4s one is for the "Inside Work Sample" and the other is for the "Outside Work Sample." Please confirm that the data relating to these barcodes were used to develop the work/activities sampling data. If this is incorrect, please explain what these data were used for.

(c) Please confirm that the data for the "Inside Study" and the "Inside Work Sample" were both collected on the route-days included in your Engineered Standards Database (LR I-163). If this is incorrect, please explain when each of these types of data were collected.

(d) Please confirm that the data for the "Outside Study" and the "Outside Work Sample" were both collected on the route-days included in your Engineered Standards Database (LR I-163). If this is incorrect, please explain when each of these types of data were collected.

RESPONSE:

(a) Not confirmed. Time study data were not used to develop the time standards ultimately developed for the Postal Service. Note also that "Inside Study" and "Outside Study" relate to time studies that are not related to the work sampling that is the subject of my testimony.

The two page 3's refer to inside and outside data collection. To maintain the data collection hierarchy levels 8 through 13 for both inside and outside time study and work sampling the pages were numbered in this method. The work standards that were established were based on a predetermined work measurement system called MOST®. The work sampling data collected allowed

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

for the application to include a percent delay factor into the predetermined system.

(b) The two page 4s refer to inside and outside data collection. To maintain the data collection hierarchy levels 8 through 13 for both inside and outside time study and work sampling, the pages were numbered in this method. The work standards that were established were based on a predetermined work measurement system called MOST®. The work sampling data collected allowed for the application to include a percent delay factor into the predetermined system.

(c) Confirmed, the routes were observed for the entire day.

(d) Confirmed.

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

ADVO/USPS-T13-93. In LR USPS I-221 (Engineered Standards Book of Barcodes), code levels 8.2 through 11.4.1 are divided between "Inside" and "Outside."

- (a) Please confirm that the only codes given in your testimony (other than the codes associated with unit/route/job classification) are the code levels 10 through 11.4.1 of the "Outside Study" set. If this is incorrect, please indicate where in your testimony these other codes can be found.
- (b) Please refer to your responses to MPA/USPS-T13-22 and 23, where you explain the points at which the outside activities of letter carriers began and ended. Are these points the breakpoints for "Inside Study" and "Outside Study?" If not, please explain fully the relationship between the outside activities and the "Outside Study" codes (i.e., are there "Outside Study" coded tallies that were not included in the LR I-163 database? Should some "Inside Study" coded tallies be included in the LR I-163 database?)
- (c) Please confirm that there were "Inside Study" codes for "inside clock" and "outside clock," were any of these codes recorded and, if so, why weren't these used for those particular route days?

RESPONSE:

- (a) Confirmed.
- (b) No. The terms "Inside Study" and "Outside Study" refer strictly to barcodes used for time studies, whereas my answer to questions 22 and 23 was in the context of work sampling. Since the time studies have nothing to do with the work sampling that is the subject of my testimony, they were not, and should not, be included in LR-I-163.
- (c) Confirmed that there are codes under "Inside Study" that are used for time studies (not the work sampling that is the subject of my testimony) of the time the carrier is clocked in the office portion of his workday (inside clock) and clocked in to the outside portion of the workday (outside clock). The term "Inside Clock" is used when the carrier is clocking into work in the postal unit. The term "Outside Clock" is used when the carrier is clocking onto the street

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

delivery portion of the day. The barcode sheet was formatted in this fashion to allow for easier recording of the observation of clocking onto the street. The time study requirements made on the observers were to capture as many time studies in a day as possible. In turn there may be several days in the overall database that do not contain time studies for the "Inside Clock" and "Outside Clock".

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

ADVOIUSPS-T13-94. Please explain the Level 8.2 Status codes (i.e., Start, Finish, Interrupt, Resume, N/A) displayed in LR I-221 (the Engineering Standards Book of Barcodes).

(a) What was their purpose?

(b) When were they used?

(c) When there was an interruption, did the Videx II continue to beep and the data collector continue to record tallies as indicated in the 8.2 codes, or did the scanner have to be restarted?

(d) Why weren't those codes included in the LR I-163 database?

RESPONSE:

(a-b) Start is scanned when the observer wants to start a time study. Finish is scanned when the observer completes a time study. Interrupt and resume are used during certain types of time studies to allow the observer to break and then continue the time study later. The N/A barcode allows the observer to bypass the time study portion of data collection and proceed to the work sampling portion of the data collection. Note that time studies have nothing to do with the work sampling that is the subject of my testimony.

(c) The interruption is related to time study. The six minute beep is not associated in any way with this barcode. The scanner continued to beep every six minutes through out the entire day, regardless. Once the scanner is removed from the docking station it is active though out the entire day. Note that time studies have nothing to do with the work sampling that is the subject of my testimony.

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

(d) The time study data collected using the start, stop, interrupt and resume functions is not used by witness Baron. The time study data is a separate function from the work sampling data used by witness Baron.

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

ADVO/USPS-T13-95. For LR I-221 (Engineering Standards Book of Barcodes), please explain why there are "Inside Study" codes for the following:

- (a) Bus - Public (TT25)
- (b) Train/Subway (TT29)
- (c) Load Vehicle, Return Hamper (V02)
- (d) Travel to 1st Delivery (V03)
- (e) Refueling (V04)
- (f) Travel b/t Park Points (V05)
- (g) Return to Unit (V06)
- (h) Unload Vehicle at End (V07)

RESPONSE:

(a-h) Note that these codes are used for time studies that are not the subject of my testimony. The arrangement of the barcodes on the data collection sheets is to allow the ease of time studying of events that cause the carrier to move from inside events to outside events. The carrier performs a vehicle inspection in the morning while on the "Inside Clock". Loading the vehicle occurs with the carrier moving from inside the postal unit to the loading dock. A similar situation occurs at the end of the day for unload the vehicle and return to unit time studies.

Arrangement of the time study codes on the barcode scanning sheets was for the ease of use by the observers and are not reflected in the Library Reference LR-I-163 because they are not related to the work sampling that is the subject of my testimony.

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

ADVO/USPS-T13-96. For LR I-221 (Engineering Standards Book of Barcodes), please confirm the following and explain why it occurs:

(a) Both the "Inside Study" and "Outside Study" sets of codes have the same codes for Vehicle Types (Level 8.3 TT codes) and Task Types (Level 8.4 V codes).

(b) Both the "Inside Study" and "Outside Study" sets of codes have many of the same Level 10 Location codes (i.e., dock, vehicle, misc, PBL).

RESPONSE:

Again, note that the "Inside Study" and "Outside Study" codes have nothing to do with the work sampling that is the subject of my testimony, and relate to separate time studies.

(a) Confirmed. The arrangement of the barcodes on the data collection sheets is to allow the ease of time studying of events that cause the carrier to move from inside events to outside events. The carrier performs a vehicle inspection in the morning while on the "Inside Clock". Loading the vehicle occurs with the carrier moving from inside the postal unit to the loading dock. Arrangement of the codes on the was for the ease of use by the observers and are not reflected in the Library Reference LR-I-163 because they are not related to the subject of my testimony.

(b) Not confirmed. I do not understand your question. "Inside Study" and "Outside Study" codes relate to time studies, while Level 10 location codes relate to work sampling. They have nothing to do with each other.

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

ADVO/USPS-T13-98. In the Outside Study and Work Sample codes listed in LR I-221 (Engineering Standards Book of Barcodes), please explain:

(a) The definitional difference between the Level 8.4 "Outside Task" codes P codes for items such as various types of deliveries, unloading vehicle, re-arranging vehicle, restocking satchel) and the Level 11.4.1 "Outside Activities" codes (e.g., J codes for delivery/collection and setup; T code for travel between deliveries).

(b) The circumstances when the data collectors entered each Level 8.4 code.

(c) How each of the Level 8.4 P codes relate to each of the Level 11.4 Work Activity codes.

RESPONSE:

(a) I don't understand your question. I cannot discern any matches between Level 8.4 "Outside Task" codes and the Level 11.4.1 "Outside Activities" codes.

Note that the 8.4 level codes are used to time study events, whereas the 11.4.1 codes are used for work sampling activities. Time study records a quantity of events that occur over time. Work sampling records a frequency of occurrence.

Note that the time studies have nothing to do with the work sampling that is the subject of my testimony.

(b) The 8.4 level codes are related to the 8.3 level codes for time studying events. The 8.4 level codes define the task that is occurring from the code chosen in the 8.3 level. The following list describes the use of these codes:

TaskType Code	Task Type	Tasks Code	Tasks	Time study timed:
DT12	Curb	P01	Basic	Basic delivery to a group of curb type deliveries
DT12	Curb	P02	Accountable	Delivery of an accountable(s) to curb type deliveries

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

DT12	Curb	P03	Dismount Acct'	Dismount delivery of accountable(s) to curb type deliveries
DT12	Curb	P05	Parcel	Parcel(s) delivery to curb type deliveries
DT12	Curb	P06	Dismount Parcel	Dismount parcel(s) delivery to curb type deliveries
DT12	Curb	P09	Setup Vehicle	Vehicle setup on a curb route
DT12	Curb	P10	Collection	Servicing a collection box on a curb type route
DT12	Curb	V05	Travel b/t Pnts	Travel between points on a curb type route
DT12	Curb	V06	Return to Unit	Returning to postal unit on a curb type route
DT12	Curb	V07	Unload Vehicle	Unloading the vehicle on a curb type route
DT12	Curb	Y00	N/A	
DT13	Foot/Walking	P01	Basic	Basic delivery to a group of deliveries on a walk out route
DT13	Foot/Walking	P02	Accountable	Delivery of an accountable(s) on a walk out route
DT13	Foot/Walking	P07	Relay Restock	Restocking the satchel on a walk out route
DT13	Foot/Walking	V06	Return to Unit	Returning to postal unit on a walk out route
DT14	Dismount	P01	Basic	Basic dismount delivery
DT14	Dismount	P02	Accountable	Delivery of an accountable(s) by dismounting the vehicle
DT14	Dismount	P04	LVR Accountable	Dismount delivery of accountable(s) to a Large Volume Receiver
DT14	Dismount	P05	Parcel	Dismount delivery of parcel(s)
DT14	Dismount	P09	Setup Vehicle	Setup of the vehicle during a dismount portion of a route
DT14	Dismount	P10	Collection	Servicing a collection box on a dismount portion of a route
DT15	Central/Inside	P01	Basic	Basic delivery to a inside central group of deliveries
DT15	Central/Inside	P02	Accountable	Delivery of an accountable(s) on the inside central portion of a route
DT15	Central/Inside	P05	Parcel	Delivery of a parcel(s) on the inside central portion of a route
DT15	Central/Inside	P07	Relay Restock	Restocking the satchel on the inside central portion of a route
DT15	Central/Inside	P10	Collection	Service the collection box at the inside central location
DT15	Central/Inside	Y00	N/A	
DT16	Park and Loop	P01	Basic	Basic delivery of a group of deliveries on a Park and Loop portion of a route
DT16	Park and Loop	P02	Accountable	Delivery of an accountable(s) while on the Park and Loop portion of a route
DT16	Park and Loop	P03	Dismount Acct'	Dismount delivery of an accountable(s) while on the Park and Loop portion of a route
DT16	Park and Loop	P05	Parcel	Delivery of a parcel(s) while on the Park and Loop portion of a route
DT16	Park and Loop	P06	Dismount Parcel	Dismount delivery of a parcel(s) while on the Park and Loop portion of a route
DT16	Park and Loop	P07	Relay - Restock	Restocking the satchel while on the Park and Loop portion of a route

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

DT16	Park and Loop	P09	Setup Vehicle	Setup of the vehicle while on the Park and Loop portion of a route
DT16	Park and Loop	P10	Collection	Servicing a collection box while on the Park and Loop portion of a route
DT16	Park and Loop	Y00	N/A	
DT17	Central/Outside	P01	Basic	Basic delivery to a inside central group of deliveries
DT17	Central/Outside	P02	Accountable	Delivery of an accountable(s) on the inside central portion of a route
DT17	Central/Outside	P05	Parcel	Delivery of a parcel(s) on the inside central portion of a route
DT17	Central/Outside	P06	Dismount Parcel	Dismount delivery of a parcel(s) while on the outside central portion of a route
DT17	Central/Outside	P07	Relay - Restock	Restocking the satchel on the inside central portion of a route
DT17	Central/Outside	Y00	N/A	
PT01	AM Letters	Y00	N/A	
PT01	AM Letters	Y02	Withdrawal/Retrn	Withdrawing from the ledge and returning letter missorts to the case with paces
PT01	AM Letters	Y02	Withdrawal	Withdrawal of bulk letter mail from the distribution case with paces to and from
PT01	AM Letters	Y03	Sort Or Case	Sorting and casing letters in the am at the carrier workstation
PT01	AM Letters	Y05	Hot Case	Obtaining mail from the hotcase with paces to and from
PT01	AM Letters	Y07	Pulldown	Pulling down cased letter mail from the carriers workstation
PT02	AM Flats	Y00	N/A	
PT02	AM Flats	Y02	Withdrawal/Retrn	Withdrawing from the ledge and returning flat missorts to the case with paces
PT02	AM Flats	Y02	Withdrawal	Withdrawal of bulk flat mail from the distribution case with paces to and from
PT02	AM Flats	Y03	Sort Or Case	Sorting and casing flats in the am at the carrier workstation
PT02	AM Flats	Y07	Pulldown	Pulling down cased flat mail from the carriers workstation
PT03	AM Accountable	Y00	N/A	
PT03	AM Accountable	Y02	Withdrawal/Retrn	Withdrawing from the ledge and returning accountables to the cage
PT03	AM Accountable	Y02	Withdrawal	Obtaining accountable from the cage or rolling accountable cage
PT03	AM Accountable	Y03	Sort Or Case	Sorting or casing accountable mail to the carriers workstation
PT03	AM Accountable	Y04	AM/PM Admin	Completing forms required for accountables
PT04	AM Parcels	V02	Load Vehicle	Loading parcel(s) to the vehicle in the am
PT04	AM Parcels	Y00	N/A	
PT04	AM Parcels	Y02	Withdrawal/Retrn	Returning parcel(s) missorted to the route to the clerk

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

PT04	AM Parcels	Y02	Withdrawl	Obtaining the parcel hamper in the postal unit
PT04	AM Parcels	Y03	Sort Or Case	Sorting or arranging parcels in delivery order
PT04	AM Parcels	Y07	Pulldown	Pulling down parcel(s) from the carriers workstation
PT05	AM Mix	Y00	N/A	
PT05	AM Mix	Y02	Withdrawal/Retrn	Withdrawl and return of mixed (letters and flats) missorted to the route
PT05	AM Mix	Y02	Withdrawl	Withdrawl of mixed mail from the distribution case
PT05	AM Mix	Y03	Sort Or Case	Sorting or casing mixed mail to the carriers workstation
PT05	AM Mix	Y05	Hot Case	Obtaining mixed mail from the hotcase paces to and from
PT05	AM Mix	Y07	Pulldown	Pulling down mix mail from the carriers workstation
PT06	AM Admin	P00	Clock(outside)	Total time of the street portion of the carriers day
PT06	AM Admin	Y00	N/A	
PT06	AM Admin	Y01	Clock (inside)	Total time of the office portion of the carriers day
PT06	AM Admin	Y04	AM/PM Admin	Administration time in the office
PT06	AM Admin	Y06	COA 's	Time to complete the change of address forms
PT07	PM Letters	Y03	Sort Or Case	Sorting or casing letters at the end of the day
PT07	PM Letters	Y07	Pulldown	Pulling down letters at the end of the day
PT08	PM Flats	Y03	Sort Or Case	Sorting or casing flats at the end of the day
PT08	PM Flats	Y07	Pulldown	Pulling down flats at the end of the day
PT09	PM Accountable	Y00	N/A	
PT09	PM Accountable	Y04	AM/PM Admin	Returning "arrow" key and undelivered accountables at the end on the day
PT10	PM Mix	Y00	N/A	
PT10	PM Mix	Y03	Sort Or Case	Sorting or casing mixed mail at the end of the day
PT10	PM Mix	Y07	Pulldown	Pulling down mixed mail at the end of the day
PT11	PM Admin	P00	Clock(outside)	Total time of the street portion of the carriers day
PT11	PM Admin	Y00	N/A	
PT11	PM Admin	Y01	Clock (inside)	Total time in the office after completing the street delivery
PT11	PM Admin	Y04	AM/PM Admin	Administration time in the office at the end of the day
TT00	N/A	Y00	N/A	
TT19	Jeep	P09	Setup Vehicle	Moving tubs and trays in the jeep during the delivery cycle
TT19	Jeep	V01	Vehicle Inspect	Inspection of a jeep including paces to and from
TT19	Jeep	V02	Load Vehicle	Loading of a jeep with mail and parcels
TT19	Jeep	V03	Trav to 1st Delv	Travel to the first delivery point in a jeep
TT19	Jeep	V04	Refueling	Refueling of a jeep
TT19	Jeep	V05	Travel b/t Pnts	Travel between points in a jeep
TT19	Jeep	V06	Return to Unit	Returning to unit in a jeep
TT19	Jeep	V07	Unload Vehicle	Unloading empty trays and tubs from a jeep at the end of the day
TT19	Jeep	Y00	N/A	

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

TT20	LLV	P09	Setup Vehicle	Moving tubs and trays in the Long Life Vehicle (LLV) during the delivery cycle
TT20	LLV	V01	Vehicle Inspect	Inspection of a LLV including paces to and from
TT20	LLV	V02	Load Vehicle	Loading of a LLV with mail and parcels
TT20	LLV	V03	Trav to 1st Delv	Travel to the first delivery point in a LLV
TT20	LLV	V04	Refueling	Refueling of a LLV
TT20	LLV	V06	Return to Unit	Returning to unit in a LLV
TT20	LLV	V07	Unload Vehicle	Unloading empty trays and tubs from a LLV at the end of the day
TT20	LLV	Y00	N/A	
TT21	1 or 2 Ton	V01	Vehicle Inspect	Inspection of a 1 or 2 ton truck including paces to and from
TT21	1 or 2 Ton	V02	Load Vehicle	Loading of a 1 or 2 ton truck with mail and parcels
TT21	1 or 2 Ton	V03	Trav to 1st Delv	Travel to the first delivery point in a 1 or 2 ton truck
TT21	1 or 2 Ton	V05	Travel b/t Pnts	Travel between points in a 1 or 2 ton truck
TT21	1 or 2 Ton	V06	Return to Unit	Returning to unit in a 1 or 2 ton truck
TT22	Pickup / Van	V02	Load Vehicle	Loading of a pickup truck or van with mail and parcels
TT22	Pickup / Van	V03	Trav to 1st Delv	Travel to the first delivery point in a pickup truck or van
TT22	Pickup / Van	V05	Travel b/t Pnts	Travel between points in a pickup truck or van
TT22	Pickup / Van	V06	Return to Unit	Returning to unit in a pickup truck or van
TT23	Walk - Push Cart	V03	Trav to 1st Delv	Traveling to first delivery point by walking with a push cart
TT23	Walk - Push Cart	V06	Return to Unit	Returning to the postal unit by walking with a push cart
TT25	Bus - Public	V03	Trav to 1st Delv	Traveling to the first delivery point on a bus
TT25	Bus - Public	V06	Return to Unit	Returning to the postal unit on a bus
TT26	Automobile	V06	Return to Unit	Returning to the postal unit in a car
TT27	Elevator - Passn	Y00	N/A	Riding in a elevator
TT28	Walking	V03	Trav to 1st Delv	Traveling to the first delivery on a walk out route with satchel
TT28	Walking	V06	Return to Unit	Returning to the postal unit on a walk out route

(c) There is no intended relationship between these codes. One is used for time studies, the other for work sampling.

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

ADVO/USPS-T13-99. Consider the barcodes listed in LR I-221 (Engineering Studies Book of Barcodes).

(a) When you assigned tallies among the STS classifications, did you use any coded or written information other than the Outside Study Codes 10 through 11.4.1 included in LR I-163? If so, please explain fully.

(b) If you did not use the Level 8.2 through Level 9.1 Outside Study information for purposes of assigning tallies among the STS classifications, please explain why you ignored that information.

(c) Why did you exclude the Level 8.2 through Level 9.1 Outside Study information from the LR I-163 database? Please explain.

RESPONSE:

(a) Other information such as observer comments were used to determine individual tallies that could not be easily classified. Approximately 90 percent of the tallies recorded fell nicely into the STS categories.

(b) This information pertained to time studies unrelated to the work sampling at issue in my testimony.

(c) Please see response to ADVO/USPS-T13-97 above. Time study and work sampling provide two different but similar pieces of information. Witness Baron only required the work sampling tallies to complete his STS model.

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

ADVO/USPS-T13-100. Please refer to the Level 13 barcodes listed in LR I-221 (Engineering Studies Book of Barcodes).

(a) For each route-day, how often were each of these items identified and counted? Please specify by each code.

(b) Provide a complete definition for each item.

(c) Are these the manual entries which you describe in response to MPA/USPS-T13-43? Please explain.

RESPONSE:

Note that the Level 13 codes are unrelated to the work sampling that is the subject of my testimony.

(a-b) R01 Temperature – once per hour – the temperature in degrees farenheight.

R02 Humidity – once per hour – humidity in percent.

R03 Wind – when wind occurred, once per hour

R04 Rain – when rain occurred, once per hour

R05 Snow – when snow occurred, once per hour

R06 Hail – when hail occurred, once per hour

Count Items:

R09 Qty of DPS mail – once per day – quantity of Delivery Point

Sequenced mail for the day.

R10 Am qty of letters – once per day – quantity of letters cased in the morning.

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

R11 AM qty of flats – once per day – quantity of flats cased in the morning.

R18 Qty of parcels – once per day – quantity of parcels for the day.

R19 Qty of Accountables – once per day – quantity of accountables for the day.

R40 Qty of SPR's – once per day – quantity of small parcels or rolls for the day.

R41 Qty of ADVO's – once per day – quantity of detached address labels cased in the morning.

R59 DPSMsort2Rout – once per day – quantity of delivery point sequenced mail that was missorted to the route for the day.

R58 DPS/out/of/Seq – once per day quantity of delivery point sequenced mail that was out of sequence on the route for the day.

R42 Qty Pre-Seq'd – once per day – quantity of pre-sequenced mail on the route for the day.

R44 Qty UBBM – once per day – quantity of undeliverable bulk business mail on the route for the day.

R45 Qty Missorts – once per day – quantity of mail missorted by the clerks to the route for the day.

R56 Empty Satchel – once per day – the weight of an empty satchel

R57 Wgt'd Satchel – As often as possible through the day – the weight of the satchel loaded with mail prior to delivering a loop.

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

R06 Bundle Method – once per day – the bundle method used by the carrier, typically a one, two or three bundle method was used.

R12 Carrier Hgt In. – once per day if possible – the carriers height in inches.

R13 Carrier Age – once per day if possible – the carriers age in years.

R14 Carrier Outseam – once per day if possible – the length of the carriers outseam in inches.

R15 Smoker = 1 – once per day - the observers entered a 1 in the scanner if the carrier was a smoker.

R16 1=RH 2=LH – once per day – the observers entered a 1 if the carrier was right handed and a 2 if the carrier was left handed.

R17 1=M 2=F – once per day – the observers entered a 1 if the carrier was a male or a 2 if the carrier was a female.

R62 # of tubs – once per day if possible – the number of tubs used on the route for the day.

R61 # of trays – once per day if possible – the number of trays used on the route for the day.

R20 Subj Wgt. Lbs – once per day if possible – the carriers weight in pounds.

R21 Subj. Reach – once per day if possible – the carrier reach in inches.

R43 Method 3+1 used – once per day if possible – a 1 was entered in the scanner if the carrier used the 3+1 bundle method.

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

Distances from work station to:

R23 Clock – once per day – number of paces to the time clock.

R24 Acc'table cage – once per day – number of paces to the accountable cage.

R25 Hot Case – once per day - number of paces to the to the hot case.

R26 Parcel Hamper – once per day- number of paces to the parcel hamper.

R27 Throwback case – once per day- number of paces to the throwback case.

R28 Vehicle – once per day – number of paces to where the vehicle was parked.

R29 Reloc Veh 2 Doc – once per day if occurred – number of paces the vehicle to relocate the vehicle for loading

R30 Distr Case1 – once per day – the number of paces to the first distribution case.

R31 Distr Case2 – once per day if it exists – the number of paces to the second distribution case.

R32 Distr Case3 – once per day if it exists – the number of paces to the third distribution case.

R33 Distr Case4 – once per day if it exists – the number of paces to the fourth distribution case.

R34 Distr Case5 – once per day if it exists – the number of paces to the fifth distribution case.

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

R35 Vim Hamper – once per day if it exists – the number of paces to the vertical improved mail hamper.

R36 Breakroom – once per day – the number of paces to the breakroom.

R37 Restroom – once per day – the number of paces to the restroom.

R38 Supervisor Desk – once per day – the number of paces to the supervisor's desk.

R39 1st Swing Door – once per day – the number of paces to the first swinging exit door.

3999X items:

R48 3999 type 1 – once per day – the number of residential other deliveries on the USPS form 3999X.

R49 3999 type 2 – once per day – the number of residential curb deliveries on the USPS form 3999X.

R50 3999 type 3 – once per day – the number of residential neighborhood delivery and collection box units (NDCBU's) on the USPS form 3999X.

R51 3999 type 4 – once per day – the number of residential central deliveries on the USPS form 3999X

R52 3999 type 5 – once per day - the number of business other deliveries on the USPS form 3999X.

R53 3999 type 6 – once per day - the number of business curb deliveries on the USPS form 3999X.

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

R54 3999 type 7 – once per day – the number of business neighborhood delivery and collection box units (NDCBU's) on the USPS form 3999X.

R55 3999 type 8 – once per day - the number of business central deliveries on the USPS form 3999X.

R60 DelPtGvnAway – once per day if it occurred – the number of delivery point given away from the route on the day observed.

R07 Park Pts – once per day – the number of park points used on the route on the day observed.

(c) Yes, the Videx barcode scanner has a numeric key pad that once an R code listed above is scanned the scanner prompts the observer to enter a number.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-1. Please identify the date on which you were made aware that the USPS might use the ES data in its calculation of postal rates. Identify what knowledge you had on that date of the Street-Time Survey, the Foot Access Test, the Curbline Access Test, and the Load Time Variability Test.

RESPONSE:

Some time in the August – September 1999 time frame I became aware of Postal Service interest in the ES data for possible use in a rate case. I had no knowledge of the Street-Time Survey prior to meeting with members of Foster Associates, Incorporated and with witness Stevens.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPAIUSPS-T13-2. Did the fact that the USPS might use the ES data for rate making affect in any way the design of the ES data collection? If so, how?

RESPONSE:

No.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-3. Are you aware of the recommendations of the Data Quality Study with regard to the use of the route measurement data from the Delivery Redesign project? If so, state your understanding of these recommendations.

RESPONSE:

No, I am not aware of the recommendations of the Data Quality Study.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-4. Please indicate the number of times that you met with USPS Witness Baron with regard to preparation of R2000-1, and state the purpose of each such meeting. Provide any and all records of these meetings, including, but not limited to, notes, correspondence and memoranda.

RESPONSE:

I do not remember how many times I met with witness Baron. I did not make any notes or develop any records of the meetings with Witness Baron.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-5. Please refer to page 4, lines 34-35 of your testimony, at which you describe Appendix E, Form 3999x, as being "used to prepare the database for Foster Associates Inc." Please describe how this form was used.

RESPONSE:

The route totals at the bottom of the final page of a 3999x data set were used in the early steps with Foster Associates Inc. to classify routes as Park & Loop, Curbline, Mixed Business. This classification was not necessary and we dropped the route classification data from the information given to Foster Associates Inc.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-8. Please identify the primary focus of the Engineered Standards study. Please state whether that focus was to observe all the different activities that letter carriers are required to perform. Please state how your program of observations was organized to achieve this.

RESPONSE:

There were three major areas of focus and they were progressive. The first area of focus was to collect data on the actual activities being performed by carriers along with criteria that might be effecting their activities. The second area of focus was the development of the methods, time standards, and the time standards application technique/workload managing system. The third area of focus was the implementation of the methods, time standards, route adjustment process, workload managing system, and analysis of the results of implementation at four test sites.

Yes, we were interested in observing all the work activities performed by carriers.

Our observations of the route began before the carrier arrived and finished upon completion of the route. Work sampling began upon carrier clocking in and finished upon the carrier clocking out. In addition to the work sampling, time studies, videotape, and other quantitative data were collected throughout the day.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-9. Please refer to your Testimony, at page 5, lines 14-15, at which you state: "The data collection needed to be comprehensive in order to support in-depth analysis and validation of work methods." Please describe the ways in which your study was "comprehensive," what analysis was performed, and how work methods were validated.

RESPONSE:

Work sampling, time studies, videotape, and other quantitative data were collected throughout the day. A predetermined time system was applied to the activities performed and used information from the data collected. This approach provided written methods descriptions and generated the standard time for each activity. These activity/methods descriptions and times were reviewed by the Postal Subject Matter Expert, and other team members during the development of the application system. The videotape served as a platform for review of the methods being used, as a way to validate methods, and as a time study technique. Frame- by-frame data were extracted and these actual times were compared to the time projected by the application of the methods developed and predetermined time measurement systems.

Analysis 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.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-11. Please refer to your Testimony at page 6, lines 17-18. Please describe how and why six minutes was chosen as the observation interval.

RESPONSE:

An observation made every six minutes would give 10 observations per hour which would make it easy for anyone to relate to a percentage of time spent performing a task or time spent at a location during the work hours of a day.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-13. Please refer to your Testimony at page 7, footnote 3, in which you describe the technique used to ensure random selection of routes. Please describe the purpose of randomly selecting routes within a station?

RESPONSE:

We wanted to minimize the potential impact Postal Service management, the carrier and/or the Union might have on the routes being studied. We had also been advised the data may be used to support negotiations and/or possible arbitration and we wanted to reduce any bias that could be introduced by teams picking specific types of routes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-TI3-15. Please refer to your Testimony at page 7, lines 12-14, at which you describe the two phases of data collection performed. As to this data collection, please explain how data collectors were selected and trained. Please provide copies of all training materials and manuals. Please indicate any and all differences between the training process used for Phase 1 and that used for Phase 2.

RESPONSE:

Phase 1 data collectors were either assigned by their respective companies or independent contractors that I was aware of from previous consulting jobs.

Phase 2 data collectors were contractors from Phase 1, contractors hired through A. T. Kearney, and contractors brought on board by Resource & Process Metrics, Inc.

The data collectors in Phase 1 participated in the inventory of the carrier tasks, assisted with development of the data collection approach, and participated in the pilot study to perfect the data collection approach. During Phase 2 new data collectors were placed with Phase 1 data collectors to receive on the job instruction as to the data requirements and techniques used. They also received on the job instruction from Postal Subject Matter Experts. In Phase 2, there were three Phase 1 collectors teamed with six new collectors for 3 weeks for on the job instruction, then these nine were teamed with 18 additional collectors for 2 weeks for on the job instruction. Then the three collectors from Phase 1 formed the Quality Control – rovers, and twelve 2-person teams formed the collection group.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

Team members reviewed a book of Postal Forms carriers may fill out, pictures of Postal equipment and mailboxes/drops, and a book of bar codes. The experienced contractors and Postal Subject Matter experts worked with the contractors.

Any additional Phase 2 contractors were placed with the two person teams and received on the job instruction and instruction from a Postal Service Subject Matter Expert.

ES materials used in support of on the job instruction: a book of forms/pictures developed and used by the Postal Subject Matter Expert, and the bar code book developed in Phase 1. Engineered Standards Book of Forms/Pictures Library Reference USPS-LR-I-220 and Engineered Standards Book of Bar Codes Library Reference USPS-LR-I-221. These library references will be filed shortly.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-16. Please identify individuals who served as data collectors for Phase 1 and Phase 2, described in your Testimony at pages 7-8. (In lieu of names, you may use codes to differentiate these individuals). As to each such individual, please identify the routes worked during Phase 1 and Phase 2.

RESPONSE:

Code	Phase 1	Phase 2
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
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
OBS42		X
OBS43		X

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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

Phase 1 Observer and Routes

ObserverCode	RoutNumberCode
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

OBS04	4219
OBS04	4242
OBS04	4310
OBS04	4445
OBS04	8044
OBS04	8229
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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

OBS07	2385
OBS07	3104
OBS07	3125
OBS07	3141
OBS07	3703
OBS07	3703
OBS07	3704
OBS07	3705
OBS07	3705
OBS07	3707
OBS07	4708
OBS07	4712
OBS07	4719
OBS07	4725
OBS07	4726
OBS07	4731
OBS07	4732
OBS07	4732
OBS07	4811
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	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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

OBS12	0429
OBS12	0603
OBS12	0607
OBS12	1620
OBS12	2155
OBS12	2161
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	5566
OBS13	6229
OBS13	6288
OBS13	8404
OBS13	8408

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

Phase 2 Observer and Routes

ObserverCode	RoutNumberCode
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
OBS14	0825
OBS14	0828
OBS14	0830
OBS14	0832
OBS14	1579
OBS14	1581
OBS14	4234

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
OBS17	0831
OBS17	4272
OBS17	8701
OBS17	8717
OBS17	8735
OBS17	8759
OBS18	0803
OBS18	0807
OBS18	0808
OBS18	0811

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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
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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

OBS61	4224
OBS61	4236
OBS61	4265
OBS61	4917

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-18. On page 14 of your Testimony, you state that during Phase 2, 234 routes were observed at 22 locations. However, on page 8 of your Testimony, you state that ten "sites" were selected as potential implementation test sites and Delivery Redesign reduced the number of implementation test sites to five. Please explain the difference between "locations" and "sites."

RESPONSE:

Site and location mean the same.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-20. Please describe all USPS documentation on the site, routes, carriers, etc., that was reviewed by your organization in connection with the selection of sites. Please describe the types of routine and/or typical discussions with postmasters, supervisors, and carriers that were undertaken by your organization in connection with the selection of sites. If these differed between Phase 1 and Phase 2, please explain the differences.

RESPONSE:

We used Excel® to generate a random number list for the Postal Service to use in the selection of the random sites. The Postal Service picked the sites in my presence from a listing of finance numbers.

Our organization had no types of routine and/or typical discussions with postmasters, supervisors, and carriers in connection with the selection of sites.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-21. Please describe any and all instances in which the methods used in, and/or results achieved by Phase 1, caused any revisions in sampling, testing, or data processing in Phase 2. Include in this description an explanation of the extent to which the Phase 1 results were discussed with the USPS, any of its contractors, or any labor organizations, and how these discussions affected any identified revisions.

RESPONSE:

The work sampling, time study, and videotaping were not changed between the Phases. Additional bar codes were added for inputting quantitative data for electronic uploading of data that in Phase 1 was manually added to a database.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-22. Please refer to your Testimony at page 35, numbered paragraph 1, at section 11.3. During Phase 1 and Phase 2, how did you determine the specific point at which the outside activities of letter carriers began and ended? If more than one option was provided, please indicate how observers were instructed to choose between the options.

RESPONSE:

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. 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.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-23. During Phase 1 and Phase 2, how was downtime at the end of a shift – for example, after all deliveries had been completed but before the letter carrier clocked-out – recorded?

RESPONSE:

When the carrier clocked back in at the end of the day the remaining time was inside time.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-24. Please identify all sites that were used in both
Phase 1 and Phase 2, and explain why each was used for both phases.**

RESPONSE:

**CY02, CY04 were observed in Phase 1. They were also observed during
Phase 2 because they had been selected as a potential implementation
test sites.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-25. As to sites selected for Phase 1, please state why some sites were selected by the regions and others were selected randomly.

RESPONSE:

We wanted to create a data set based on random selection to compare to the sites selected by the Postal Service to determine if bias had been introduced by their selection of the sites. This approach would reduce the potential effect of Postal Service management making the selections, and the possible effect of carrier and/or the Union might have on the routes being studied. We had also been advised the data may be used to support negotiations and/or possible arbitration and we wanted to reduce any bias that could be introduced. In my opinion, we achieved this goal.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-26. Please refer to your Testimony, at page 14, lines 4-5, at which you state that, during phase 1, 106 routes were observed at 32 locations. Please provide for each CY code: the region and whether the site was chosen by the region or randomly selected.

RESPONSE:

A location contained one or more ZIP Codes.

CY02	Allegheny	Region
CY03	Allegheny	Region
CY04	Allegheny	Region
CY05	Southwest	Region
CY06	Southwest	Region
CY07	Southwest	Region
CY08	Southeast	Region
CY09	Southeast	Region
CY10	Southeast	Region
CY11	Pacific	Region
CY14	Western	Region
CY15	Western	Region
CY16	Western	Region
CY17	NY Metro	Region
CY18	NY Metro	Region
CY19	NY Metro	Region
CY20	Mid Atlantic	Region
CY21	Mid Atlantic	Region
CY22	Mid Atlantic	Region
CY23	Northeast	Region
CY26	Mid West	Region
CY27	Mid West	Region
CY28	Mid West	Region
CY29	Great Lakes	Region
CY30	Great Lakes	Region
CY31	Great Lakes	Region
CY32	Northeast	Random
CY33	Northeast	Random
CY34	NY Metro	Random
CY35	Southwest	Random
CY36	Great Lakes	Random
CY37	Great Lakes	Random
CY38	Allegheny	Random
CY39	Midwest	Random
CY40	Great Lakes	Random

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

CY41	Great Lakes	Region
CY42	NY Metro	Region
CY43	NY Metro	Region
CY44	Southeast	Region
CY45	Southeast	Region

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-27. During Phase 1, was any location that was originally chosen either by the region or by random selection ultimately unobserved? If so, please identify the site and explain why it was not observed.

RESPONSE:

Yes, time constraints did not allow us to study all the sites selected.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-28. Was any Phase 1 site observed for more than one workday? If so, please identify the site and explain why it was observed for a greater length of time.

RESPONSE:

More than one route was observed at the Phase 1 sites; therefore the teams were at the site for more than a day. It was not practical to travel to a site and conduct just a one day study.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-29. Was any Phase 1 site observed for less than one
workday? If so, please identify the site and explain why it was observed for
a lesser length of time.**

RESPONSE:

No, all sites had more than one day of observation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-30. What was the ES study purpose behind the decision to employ single-day observations in Phase 1 and multiple-day observations in Phase 2?

RESPONSE:

We wanted maximum exposure in Phase 1 to many different geographic sites to obtain representative samples. The multiple day studies in Phase 2 were to provide data about volume patterns as well as observing different carriers carrying the same route.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-31. Please refer to your Testimony at page 8, line 14.
Please define the term "Engineered Standard Implementation test site."**

RESPONSE:

**A location/site used to test the engineered methods, standards and applications
that were developed. A test site may have one or more ZIP Codes.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-32. Please refer to your Testimony at page 8, line 12.
Please describe how and why you determined the number of days a
"multiple-day" study should take, and how many days comprised a
"multiple-day" study.**

RESPONSE:

The intent was to identify monthly volume cycles through 30 calendar day studies.

However, due to resource allocation requirements multiple day studies of
variable calendar time spans were conducted.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-33. With regard to Phase 2, please provide for each CY code: the region, and whether it was chosen by the region or randomly selected.

RESPONSE:

CY02 and CY04 were also studied in Phase 2.

CY46	Western	Region
CY47	Western	Region
CY48	Midwest	Region
CY49	Southeast	Region
CY50	Pacific	Region
CY51	Pacific	Region
CY52	Pacific	Region
CY53	Pacific	Region
CY54	Southeast	Random
CY55	Southeast	Region
CY56	Southeast	Region
CY57	Mid Atlantic	Region
CY58	Mid Atlantic	Region
CY59	DC Metro	Region
CY60	Southwest	Region
CY61	Southwest	Region
CY62	Southwest	Region
CY63	Mid Atlantic	Region
CY64	Midwest	Region
CY65	Southeast	Region
CY66	Pacific	Random

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-34. During Phase 2, was any location that was originally chosen either by the region or by random selection ultimately unobserved? If so, please identify the site and explain why it was not observed.

RESPONSE:

Yes, time constraints did not allow us to study all the sites selected. Records were not maintained on these sites.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-35. During Phase 2, was any location that was originally chosen either by the region or by random selection ultimately unobserved? If so, please identify the site and explain why it was not observed.

RESPONSE:

Yes, time constraints did not allow us to study all the sites. Two sites selected at random were not studied. We are not aware of any records being kept on sites selected by the Regions that we did not study.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-36. Please refer to your Testimony, at page 11, lines 21 - 22, and levels 11.4 and 11.4.1. Please define the terms "Finger @ Delivery" and "1-Handed Slam." Please state whether it is possible to conduct a 1-Handed Slam while fingering the mail. Please explain how a 1-Handed Slam and fingering the mail at delivery are associated with reaching into the satchel to retrieve mail.

RESPONSE:

Level 11.4 contains the activity of, Finger @ Delivery, which are the actions of the carrier obtaining the mail while at the delivery point from the hand, and/or arm, and/or satchel, verifying the mail, and depositing the mail.

Level 11.4.1 contains the 1-Hand Slam which is a description of a type of mailbox where the carrier can in a upward sweeping motion open the mailbox and deposit the mail in a single downward motion.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-37. Please state what proportion of the routes
observed were being delivered by the regular letter carrier?**

RESPONSE:

You can run ratios from database. USPS-LR-I-163. Job_classification.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-38. Please refer to your Testimony at Appendix C.
Were the barcodes presented to the data collectors working on the study
as they are presented in Appendix C? If not, in what way were the
presentations different? If numbers were not sequential, explain why they
were presented in this fashion,**

RESPONSE:

**Yes, the data collectors used the sheets as presented. Numbers were also used
for inside work sampling and time study.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-39. Please refer to your Testimony at Appendix C. As to each of the following bar codes, please provide a more detailed description and explanation as to what was being observed:

- (a) L12 Point of Delivery**
- (b) L13 On Route**
- (c) L15 Miscellaneous**

RESPONSE:

- (a) L12 Point of Delivery – carrier is at the location for depositing mail.**
- (b) L13 On Route – carrier is between the 1st delivery point and the last delivery and has not deviated from his route and is not at another listed location.**
- (c) L15 Miscellaneous – Any location not listed in the L10 level codes.**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-TI3-40. Please state the procedure used by data collectors when the wrong barcode was accidentally scanned. How was this corrected?

RESPONSE:

Observers maintained a comments log through the day for noting possible changes to the scans and typically made immediate notations of scans they knew needed to be edited. Upon completion of the data collection on the route the team would return to their hotel. They would print out reports, scan for abnormalities, view their Daily Comments Log for scan edits they noted during their workday, markup the reports in red with their recommended changes. After the review process they would make phone contact the central location, discuss any issues, make arrangements to upload the data collected to a central database, upload the data, and a discussion of previous edits may take place. Next they would make copies of the reports, and place original marked up reports and videotape along with any other documents in a priority mailer for mailing to the central location the next morning.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-41. Please provide an example of a printed daily report for a specific observation.

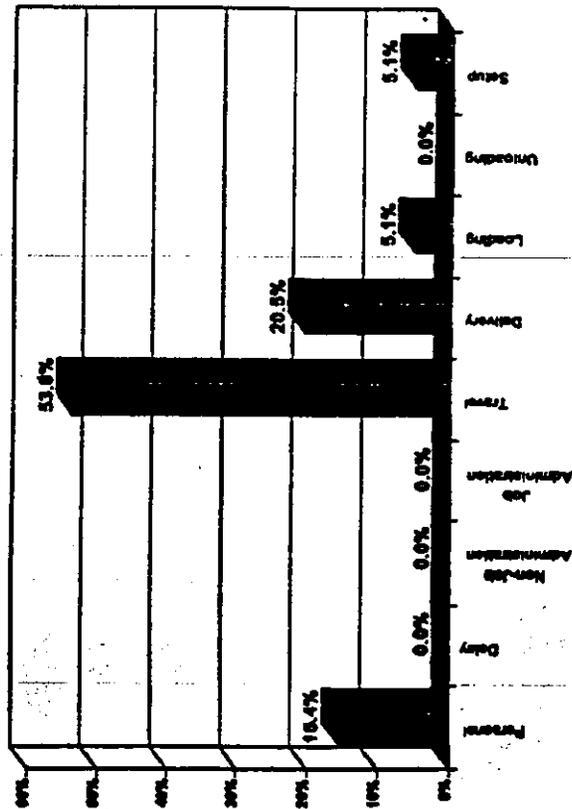
RESPONSE:

Outside Work by Delivery Type

11/1/88 8 15:33 PM

Criteria Selected: Best/AF Unit/Job Job Classification: J01 to J031 Observer/All Date Range: 1/1/88 to 11/1/88

Delivery Type: WTRB Curb



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

Data Collected - Work Sampling

187697	0830	12/18/97 5:48:20 PM	0706	0870
Job Class	Location	Personal	Delivery Type and Status	Arch Miles
Regular Carrier	Point of Deliver	N/A	Curb Resident Outside 2:40 PM	#1 Box 2:40 PM
Regular Carrier	Point of Deliver	N/A	Curb Resident Outside 2:46 PM	#1 Box 2:46 PM
Regular Carrier	Point of Deliver	N/A	Central Resident Outside 2:52 PM	Central Outside 2:52 PM
Regular Carrier	Point of Deliver	N/A	Central Resident Outside 2:58 PM	Central Outside 2:58 PM
Regular Carrier	Point of Deliver	N/A	Central Resident Outside 3:04 PM	Central Outside 3:04 PM
Regular Carrier	Point of Deliver	N/A	Central Resident Outside 3:10 PM	Central Outside 3:10 PM
Regular Carrier	Point of Deliver	N/A	Curb Resident Outside 3:16 PM	Parcel Drop to Curb 3:16 PM
Regular Carrier	Vehicle	N/A	Curb Resident Outside 3:22 PM	Travel BA D/Wr. LLV 3:22 PM
Regular Carrier	Point of Deliver	N/A	Central Resident Outside 3:28 PM	Del/Coll. Central Outside 3:28 PM
Regular Carrier	P.B.L.	Shj Break	Central 3:35 PM	N/A N/A 3:35 PM
Regular Carrier	P.B.L.	Shj Break	Central 3:40 PM	N/A N/A 3:41 PM
Regular Carrier	P.B.L.	Shj Break	Central 3:46 PM	N/A N/A 3:47 PM
Regular Carrier	Vehicle	N/A	Central 3:53 PM	Return to Unit LLV 3:53 PM
Regular Carrier	Vehicle	N/A	Central 3:59 PM	Return to Unit LLV 3:59 PM
Regular Carrier	Work Station	N/A	Inside Work 4:05 PM	Mix Mail Handling 4:05 PM

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-42. Please identify and provide all instructions and/or materials given to data collectors working on the study regarding how they were to review the accuracy of their scans.

RESPONSE:

No written instructions were provided. The data collectors knowledge of the task was provided through on the job instruction by experienced data collectors.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-43. Please refer to your Testimony at page 13, line 6, at which you refer to "manual entries." Please state what entries were made manually.

RESPONSE:

The data collectors manually entered qualitative data through the keypad on the scanner. Beginning/ending odometer readings, temperature, Humidity, quantity of DPS mail, quantity of AM letters, quantity of AM flats, quantity of parcels, quantity of accountables, quantity of SPRs, Quantity of DAL cards, quantity of DPS missorts to route, quantity of DPS out of sequence, quantity of UBBM, quantity of missorts, weight of empty satchel, weight of loaded satchel, bundle method, carrier height, carrier age, carrier outseam, smoker, right handed, left handed, male, female, quantity of tubs, quantity of trays, carrier weight, carrier reach, distance to clock, distance to accountable cage, distance to hotcase, distance to parcel hamper, distance to throwback case, distance to vehicle, distance to relocate vehicle to dock, distance to distribution case one, distance to distribution case two, distance to distribution case three, distance to breakroom, distance to restroom, distance to supervisors desk, distance to first swinging door, number of type 1 delivery points on the 3999X, number of type 2 delivery points on the 3999X, number of type 3 delivery points on the 3999X, number of type 4 delivery points on the 3999X, number of type 5 delivery points on the 3999X, number of type 6 delivery points on the

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**3999X, number of type 7 delivery points on the 3999X, number of type 8
delivery points on the 3999X, number of delivery points transferred to
another route, number of park points.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-44. Please state whether it is physically possible for a
data collector to change data before sending it to the central database
manager.**

RESPONSE:

Data collectors could not alter data in the field.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-48. Please state whether any records made during the course of the study were purged from the data set. Please state how many records were purged from the data set.

RESPONSE:

Records were purged from the database. Observers would mark on the reports records that were improperly scanned. They used their daily comments logs to assist in remembering scans for possible edits. A count of these records was not maintained. Data base administrators would identify other possible scans by reviewing reports and scans of other data collected. They would discuss possible edits with the teams before any changes were made. A count of these records was not maintained. We estimate purged records to consist of less than 0.1 percent.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T13-49. Please state whether instructions, manuals, training materials or the like were provided to central database managers concerning reviewing for accuracy, making corrections, and setting-up and/or maintaining databases. Please provide any such instructions, manuals, training materials, or the like, or describe how training in these areas was otherwise provided. Please provide examples of the daily reports reviewed by the database manager.

RESPONSE:

Database managers knew the collection strategy from either by being a data collector or from designing the data collection.

See attached examples.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

Data Collected - Work Sampling

12/18/97 5:40 PM

CYS

Route: 0370

Job Class	Location	Personal	Delivery Type and Status	Activities
Regular Carrier	Point of Delivery	2:40 PM	N/A	Curb Resident Outside 2:40 PM Del:Coll. # 1 Box
Regular Carrier	Point of Delivery	2:46 PM	N/A	Curb Resident Outside 2:46 PM Del:Coll. # 1 Box
Regular Carrier	Point of Delivery	2:52 PM	N/A	Central Resident Outside 2:52 PM Del:Coll. Central Outside
Regular Carrier	Point of Delivery	2:58 PM	N/A	Central Resident Outside 2:58 PM Del:Coll. Central Outside
Regular Carrier	Point of Delivery	3:04 PM	N/A	Central Resident Outside 3:04 PM Del:Coll. Central Outside
Regular Carrier	Point of Delivery	3:10 PM	N/A	Central Resident Outside 3:10 PM Del:Coll. Central Outside
Regular Carrier	Point of Delivery	3:16 PM	N/A	Curb Resident Outside 3:16 PM Parcel Drop to Curb
Regular Carrier	Vehicle	3:22 PM	N/A	Curb Resident Outside 3:22 PM Towel Bl Dmv. LTV
Regular Carrier	Point of Delivery	3:28 PM	N/A	Central Resident Outside 3:28 PM Del:Coll. Central Outside
Regular Carrier	P.D.L.	3:35 PM	Smj Break	Central N/A 3:35 PM N/A
Regular Carrier	P.D.L.	3:40 PM	Smj Break	Central N/A 3:40 PM N/A
Regular Carrier	P.D.L.	3:47 PM	Smj Break	Central N/A 3:47 PM N/A
Regular Carrier	Vehicle	3:53 PM	N/A	Central N/A 3:53 PM Return to Line
Regular Carrier	Vehicle	3:59 PM	N/A	Central N/A 3:59 PM Return to Line
Regular Carrier	Work Station	4:05 PM	N/A	Inside Work N/A 4:05 PM Mail Handling

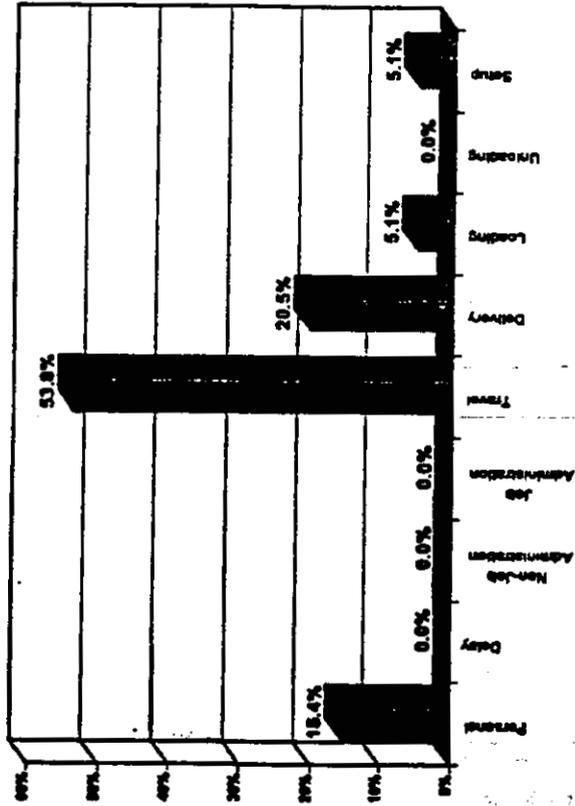
RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

Outside Work by Delivery Type

11/1/88 8:15:33 PM

Criteria Selected: Setup/All Units/All Job Classifications:JC01 to JC01 Observer:All Data Range:11/1/88 to 11/1/88

Delivery Type: WTRC Cars



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

**MPA/USPS-T13-51. Please refer to your Testimony at page 13, line 15.
Please provide a definition for the term "outlier."**

RESPONSE:

**A data record that was out of the expected norm. Examples: would be a lunch
break scan at the end of the day, or six vehicle inspection scans back to back.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-52. In allocating the ES data to the STS categories were any problems experienced? If so, please explain what these problems were and how they were resolved.

RESPONSE:

No problems were experienced.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-53. Identify any and all USPS employee(s), contractor(s) and/or representative(s) with whom you had any discussions regarding the allocation of the ES data to STS categories. As to each such individual, state the substance of any such discussion.

RESPONSE:

Donald Baron - contractor Foster Associates

Dennis Stephens - employee USPS

John Kelley - employee USPS

Robert Boldt – independent contractor with Resource & Process Metrics, Inc.

William Lloyd – Resource & Process Metrics, Inc.

We reviewed the definitions as stated in appendix F.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-54. Please refer to your Testimony at page 14, lines 9-10, at which you state that "carrier activity information collected during the ES study was classified according to the STS definitions for carrier activities. Please identify the source of the STS definitions, as well as copies of the definitions.

RESPONSE:

Dennis Stevens provided the STS definitions.

Definitions provided are exact to appendix F.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.**

MPA/USPS-T13-55.

As to each route code, please provide the following:

- (a) the delivery type;
- (b) the delivery type status;
- (c) the possible delivery points by type and type status; and
- (d) the actual deliveries made by type and type status.

RESPONSE:

- (a) Refer to column in Library Reference USPS-LR-I-163.
- (b) Refer to column in Library Reference USPS-LR-I-163.
- (c) Not available
- (d) Not available

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.

MPA/USPS-T13-57. Please refer to page 10 of your testimony, where you state: ...the TW2 was programmed with the data collection hierarchy and to emit an audible tone to notify collectors to collect work-sampling data. The collection of the work-sampling data began with this tone. At the beep, the LCD on the TW2 prompted data collectors with the word/phrase representing each level of the collection hierarchy. Information was required to be collected/scanned at each level of the hierarchy. In general, all sub-level information (detail level) was scanned before the data collector continued the scanning process at the next level.

Please provide all systematic written or oral instructions that were given the data collectors as to the exact instant or period of carrier time to be recorded.

(a) For what period of carrier activity was the observation intended to record (e.g., an instant snapshot of the activity just as the beep occurred, a snapshot 5 or more seconds after the beep occurred, a snapshot at the next convenient location after the beep, the next several seconds of the carrier's activity just as the beep occurred, several seconds at the next convenient location after the beep)?

(b) With respect to your response in (a), what systematic efforts did you make to ensure that all data collectors correctly recorded the same instant or period of time in the same manner? For example, do any video records exist that could be matched to data records to validate the actual observations?

RESPONSE:

(a) The observer took an instant snapshot of the carrier's activity when the beep occurred. The observer then scanned in the observation as soon as possible.

(b) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes. No records were maintained on the frequency of the checks.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.

MPA/USPS-T13-58. For the observed routes:

(a) Were all of them designed as 8-hour routes? If not, please identify the ones that were not and specify their designed length.

(b) Was all 8 hours of the carrier's day observed and recorded? If some routes or days were treated differently in this respect than others, please distinguish route/day, and please explain why this was done.

(c) For any route, for any observation day, did any of the carriers exceed their 8 hours or did any complete their work before their 8 hours were over? Please identify all such route/days and explain how the observations proceeded in those cases.

(d) Did all the routes have a full-time regular carrier? If some of the data were for someone other than a full-time regular carrier, please explain what type of personnel each route had.

(e) When a chosen route had router or auxiliary assistance, how did you treat it?

(f) Please identify each route-day that also had router or auxiliary assistance.

(g) Did you determine how long it had been since each route was evaluated by a supervisor? If so, please indicate those routes for which you have this period and the length of the period since last evaluated.

(h) Did all the routes receive Delivery Point Sequenced (DPS) volume? If not, please identify the ones that did.

RESPONSE:

(a) I do not have that information. The route designed start and stop times are recorded at the beginning of the 933 video tapes. The routes were picked at random, if the route was designed for more or less than eight hours the route was studied.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

(b) The complete route was observed. No, the observers did not treat routes or days differently.

(c) The observers studied the route for the entire work cycle.

(d) The job classification for the carrier observed on each route is in Library reference USPS-LR-I-163.

(e) The observers attempted to capture all work performed in the route-day.

(f) Records were not maintained on router or auxiliary assistance.

(g) No we did not determine how long since the last route evaluation.

(h) No, all routes did not receive DPS. Library Reference USPS-LR-I-238 lists the routes that did receive DPS volume.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-59. Please refer to your testimony at Appendix C.

(a) Throughout Phases 1 and 2 of the data collection, were the same sheets, with the barcodes in the same order, used for each route?

(b) At any time, was there any effort made to determine that the order or placement of the barcodes on those sheets did not bias the data collection in any way? Please describe it.

(c) Please describe or provide a photo of exactly how the data collector handled both the barcode sheets and the Videx TimeWandII.

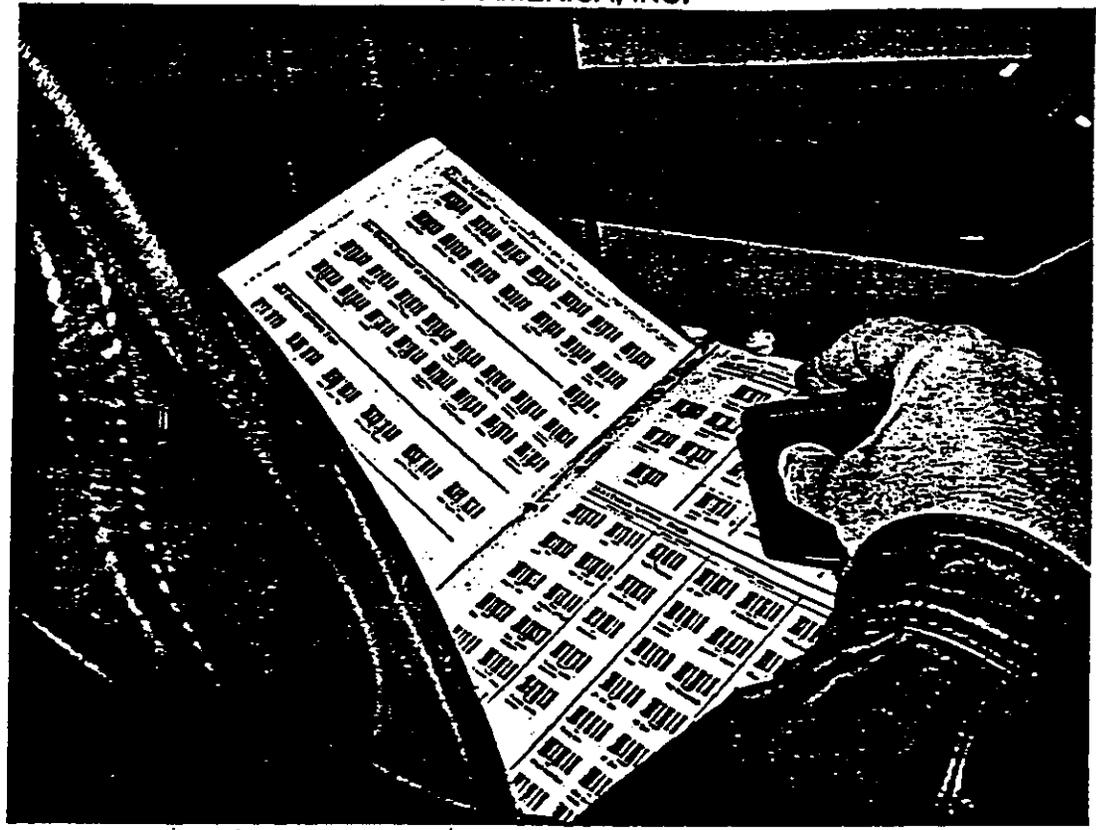
RESPONSE:

(a) Yes.

(b) No.

(c) The barcode sheets were inside plastic pockets in a ½ inch three ring binder. When the binder was open the page of Location through Outside Delivery Type, Levels 10 – 11.3 would be on the left side and the sheet of Outside Activities and Outside Activities – Details, Levels 11.4 – 11.4.1 would be on the right.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-60. Please identify, by code, each of the data collectors employed to collect this data, relate them to each route-day of data collected, and specify the ones which had previous experience (in projects other than one in which you collected this time-proportion data and the standards data) observing postal delivery carriers for purposes of identifying specific activities. If more than one collector collected this data on a particular day, please provide separate information for each.

RESPONSE:

The table that identifies the specific observers and codes is in my response to interrogatory MPA/USPS-T-13-16. OBS12 and OBS13 had collected data with the scanner on other, non-postal clients.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-61. Please refer to your testimony at Appendix D Level 10 Locations, and please provide the following:

(a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 10 Locations.

(b) All systematic efforts made to ensure that the LOO-L24 codes were consistently and correctly applied by all data collectors.

RESPONSE:

(a) Refer to Library Reference USPS-LR-I-220 that shows pictures of various postal items. The oral instructions provided to the observers are as shown Appendix D to my testimony.

(b) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes. No records were maintained on the frequency of the checks.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-62. Please provide all systematic written or oral guidance to the data collectors on how to identify and distinguish between the following location codes:

(a) LO8 Vehicle and LO7 Dock, LO9 Park Point, L13 On Route, L17 Gas Station, L19 In Vehicle at Stop, and L20 In Vehicle in Traffic.

(b) L13 On Route and LO9 Park Point, L10 Collection Box, LI 1 Relay Box, L12, Point of Delivery, L19 In Vehicle at Stop, L20 In Vehicle in Traffic, and L21 Wait when Walking.

(c) LO9 Park Point and L10 Collection Box, L12 Point of Delivery, L20 In Vehicle at Stop.

RESPONSE:

(a-c) Refer to Library Reference USPS-LR-I-220 that shows pictures of various postal items. The oral instructions provided to the observers are as shown in Appendix D to my testimony.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPAIUSPS-T13-63. Please identify what kinds of locations the data collectors would identify as Site Location L15 (Miscellaneous).

RESPONSE:

In checking the observer comments for the L15 location we have found:

Elevators, Phone Booths, Supervisors Desk, Customers lawn, Locked keys in

Vehicle, Carriers in vehicle parking lot due to no work.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-TI3-64. With respect to Level 11.2 Delivery Type, please provide:

(a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 11.2 Delivery Types.

(b) A description of all systematic efforts made to ensure that the WTOI-WT05 codes were consistently and correctly applied by all data collectors.

(c) The systematic written or oral guidance given to data collectors with respect to distinguishing between a WT04 Dismount Delivery and a WT05 Central Delivery, in terms of type of mail equipment and mail receptacles used.

RESPONSE:

(a) Oral instructions provided to observers are as shown in Appendix D to my testimony.

(b) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes.

(c) Oral instructions provided to observers are as in Appendix D. The equipment was then defined in the 11.4 and 11.4.1 levels of the barcode scanning sheets.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-65. Please explain how the data collectors assigned a Level 1 1.2 Delivery Type and Level 11.3 Delivery Type Status when the carrier was moving from one kind of delivery type or delivery type status to another.

RESPONSE:

Based on the delivery types on the USPS Form 3999X, the observers would change the delivery type when traveling to the next delivery.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS T13-66. Please state, with respect to delivery types:

(a) Whether motorized carriers ever dismount to make centralized deliveries. If so, please explain how the data collectors distinguished between the "dismount" and "centralized".

(b) Whether some carriers ever remain in their vehicles (at curblines) while delivering to NDCBU or other types of centralized outside boxes. If so, please explain how the data collectors distinguished between "curblines" and "centralized".

(c) Whether central deliveries are made by both motorized and foot carriers. Please explain.

RESPONSE:

(a) Pursuant to verbal instructions based on the instructions shown in Appendix

D to my testimony.

(b) Deliveries that were classified as Central required the carrier to exit the vehicle. If a central type box was serviced from in the vehicle and the 3999X classified the delivery point as curb the observers recorded curblines delivery.

(c) Central deliveries are serviced by both modes of travel.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.

MPA/USPS-T13-67. With respect to the Level 11.4 activities, please provide the following:

- (a) All systematic written or oral guidance that was given to the data collectors to identify and distinguish among each of the Level 11.4 Activity alternatives.
- (b) All systematic written or oral guidance that was given to the data collectors concerning the relationships between 11.4 Outside Activity and 11.4.1 Activity Detail codes.
- (c) The systematic written or oral guidance given to data collectors on how to distinguish among TO5 (walking) and TO1 Travel to First Delivery Point, TO2 Travel b/t Delivery, and TO3 Travel b/t w/Sort.
- (d) How were the data collectors systematically instructed to tell the difference between D08 Delay Specify and F04 Delay Specify? How were the data collectors systematically instructed to tell the difference between JO4 Parcels and F02 Parcels?
- (f) A description of all systematic efforts to ensure that the Level 11.4 codes were consistently and correctly applied by all data collectors.

RESPONSE:

- (a) Oral instructions provided to observers are as shown in Appendix D to my testimony.
- (b) Oral instructions provided to observers are as in Appendix D.
- (c) The T05 code was used when the carrier was walking other than the other defined codes. Oral instructions provided to observers are as in Appendix D.
- (d) The F04 Delay is related to customer delays and the D08 delays are associated with the 11.4.1 I code delays and the observers comment log.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

The J04 parcels were for in office work with parcels and F02 parcels are associated with delivery work for parcels. The records of street activity with the J04 code were associated with loading parcels into the vehicle.

(f) The USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-68. With respect to the relationship between Level 10 (Location) and Level 11.4 (Activity) codes, please provide all systematic written or oral guidance you gave your data collectors (and data processors) on Level 11.4 codes which are always or should never be associated with the following:

- (a) Dock Location.
- (b) Vehicle Location.
- (c) Park Point Location.
- (d) Collection Box Location.
- (e) Relay Box Location.
- (f) Point of Delivery Location.
- (g) On Route Location
- (h) Miscellaneous Location
- (i) Gas Station Location
- (j) In Unit Walking Location
- (k) In Vehicle at Stop Location
- (l) Wait When Walking Location
- (m) Other Route Location

RESPONSE:

(a-m) No such guidance was given regarding combinations which were not allowed. The observers were to record events as they occurred. The observers made written comments on their daily comments logs with respect to unusual situations. Without specific references to particular data records, I cannot comment further.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-69. With respect to the Level 11.2 (Delivery Type) and Level 11.3 (Delivery Type Status) codes, please:

(a) Confirm that all but 22 of your 39,046 tallies identifies a Delivery Type, even those for Dock, Collection Box, Miscellaneous, Gas Station, In Unit Walking, In Vehicle in Traffic, and Wait While Walking.

(b) Confirm that all but 4,076 of your 39,046 tallies identifies a Delivery Type Status.

(c) Provide the systematic guidance that you gave your data collectors (and data processors) on how to correctly identify delivery type for tallies not at the point of delivery.

(d) Provide all systematic guidance that you gave your data collectors (and data processors) on how to correctly identify delivery type status for tallies when the Level 10 code was not Point of Delivery.

(e) Explain why the data collectors assigned delivery type and delivery type status codes to locations that were not at the point of delivery.

RESPONSE:

(a) Confirmed.

(b) Confirmed.

(c-e) Based on the USPS Form 3999X delivery type the observer choose the code for either the delivery the carrier was servicing or the next delivery the carrier was traveling to.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-70. With respect to the relationship between Level 11.4 (Activity) and Level 1 1.4.1 (Activity Detail) codes, please provide all systematic written or oral guidance that you gave your data collectors (and data processors) on the following:

- (a) The circumstances when Activity T codes are associated with something other than Activity Detail K codes.**
- (b) Which activity detail codes should always or never be associated with Activity T codes.**
- (c) When D codes should be associated with anything other than Activity Detail I codes.**
- (d) Which activity detail codes should always or never be associated with Activity D codes.**
- (f) When Activity J codes should be associated with anything other than Activity Detail H codes.**
- (g) Which activity detail codes should always or never be associated with Activity J codes.**
- (h) When F codes should be associated with anything other than Activity Detail G codes.**
- (i) Which activity detail codes should always or never be associated with Activity F codes.**

RESPONSE:

(a-i) No specific written or oral instructions other than those shown in Appendix D to my testimony were given to the observers and data processors. Without specific references to particular data records, I cannot comment further.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-71. With respect to the relationship between Level 11.3 (Delivery Type Status) and Level 11.4.1 (Activity Detail), please provide all systematic written or oral guidance that you gave your data collectors (and data processors) on which Level 1 1.4.1 H codes (delivery receptacle type) should go with which delivery type status codes.

RESPONSE:

Observers were to record the specific type of receptacle regardless of the Delivery type status.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-72. Please consider Level 11.4 Activity Code DO1 (No Access to Box).

(a) What specific physical action was the data collector observing. Please explain how that could be determined from the data.

(b) For DO1, do the data indicate whether and how the mail was actually delivered to that particular customer? Please explain.

RESPONSE:

(a) The mail box was blocked by a parked car on a curblin delivery. A locked door on a business or central inside deliveries. A missing or damaged mail box on a Park and loop type delivery. The data records a general category, not a specific cause.

(b) I do not know. This is beyond the scope of the work sampling, which records general categories.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-73. With respect to Level 11.4 Activity Code F03 (Hardship), what specific physical action was the data collector observing? Please explain how that could be determined from the data.

RESPONSE:

Hardship is a service provided by the carrier when the customer or the customer's family has asked the carrier or the post office to make personal contact with an elderly or disabled customer with every delivery. The observer would have observed this personal contact or attempted personal contact. The F03 code is selected at the 11.4 level.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.

MPA/USPS-T13-74. For Level 11.4 Activity code FO1 (accountable), please provide the following information:

(a) At point of delivery, when an accountable (FO1) is indicated, does that mean that only an accountable was delivered to that point at that time? Please explain how that can be determined from the data.

(b) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail? Please explain.

(c) What specific physical action was the data collector observing? Please explain how that can be determined from the data.

(d) If at point of delivery, does FO1 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data..

(e) At any other Level 10 location code, other than point of delivery, when an accountable is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data.

(f) When Activity Detail Codes GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) were indicated with FO1 (Accountable), did that mean that those activities were required to physically deliver the mail to the customer? Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a) No, an accountable was the main focus of the carrier. The observer selects the F01 code at the 11.4 level.

(b) No, the work sampling data do not permit this type of information.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

(c) The carrier handling, delivering or processing an accountable type of mail.

The observer selects the F01 code at the 11.4 level.

(d-e) The level 10 location code would indicate where the carrier was, and the level 11.4.1 code would indicate the mail receptacle. Please provide the specific records for further analysis.

(f) Those activities were required to physically deliver the mail to the customer.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-75. For Level 11.4 Activity code F02 (parcel), please provide the following information:

(a) At point of delivery, when a parcel (F02) is indicated, does that mean that only a parcel was delivered to that point at that time? Please explain how that can be determined from the data.

(b) Can the data be used to determine whether that point of delivery was served a second time that day with all other mail?

(c) What specific physical action was the data collector observing? Please explain how that can be determined from the data.

(d) If at point of delivery, does F02 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data.

(e) At any other Level 10 location code, other than point of delivery, when a parcel is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data. Please explain.

(f) When Activity Detail Code GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) was indicated with F02, did that mean that those activities were required to physically deliver the mail to the customer. Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a) No, a parcel was the main focus of the carrier. The observer selects the F02 code at the 11.4 level.

(b) No, the work sampling data do not permit this type of information.

(c) The carrier handling, delivering or processing an parcel type of mail. The observer selects the F02 code at the 11.4 level.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

(d) The level 10 location code would indicate where the carrier was, and the level 11.4.1 code would indicate the mail receptacle. Please provide the specific records for further analysis.

(f) Those activities were required to physically deliver the mail to the customer.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.

MPA/USPS-TI3-76. For Level 1 1.4 Activity code JO4 (parcels), please provide the following information:

(a) At point of delivery, when parcels (JO4) are indicated, does that mean that only parcels were delivered to that point at that time? Please explain how that can be determined from the data.

(b) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail?

(c) What specific physical action was the data collector observing? Please explain how that could be determined from the data.

(d) If at point of delivery, does JO4 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that could be determined from the data.

(e) At any other Level 10 location code, other than point of delivery, when parcels are indicated, what specific physical action was the data collector observing? Please explain how that could be determined from the data.

(f) When Activity Detail Codes GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) are indicated with JO4, does that mean that those activities were required to physically deliver the mail to the customer? Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a) No, a parcel was the main focus of the carrier. The observer selects the FJO4 code at the 11.4 level.

(b) No, the work sampling data do not permit this type of information.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

(c) The carrier handling, delivering or processing an parcel type of mail. The observer selects the J04 code at the 11.4 level.

(d-e) The level 10 location code would indicate where the carrier was, and the level 11.4.1 code would indicate the mail receptacle. Please provide the specific records for further analysis.

(f) Those activities were required to physically deliver the mail to the customer.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.

MPA/USPS-T13-77. For Level 11.4 Activity code JO6 (mix), please provide the following information:

(a) At point of delivery, when mix (JO6) is indicated, does that mean a mix of mail was delivered to that point at that time? If so, does it indicate any particular products? Please explain how that can be determined from the data.

(b) Does JO6 indicate any particular type of mail container or a particular method of mail delivery, as opposed to a typical delivery of multiple postal products? Please explain.

(c) Is there information available from the data to determine whether that point of delivery was served a second time that day with all other mail?

(d) What specific physical action was the data collector observing? Please explain how that can be determined from the data.

(e) If at the point of delivery location, does JO6 indicate whether the delivery occurred at the typical delivery point (mail receptacle) or at some other, non-typical location? Please explain how that can be determined from the data.

(f) At any other Level 10 location code, other than point of delivery, when JO6 is indicated, what specific physical action was the data collector observing? Please explain how that can be determined from the data.

(g) When Activity Detail Code GO1 (public relations), GO2 (service rates), GO3 (directions), GO4 (excess words), or GO5 (excess words) were indicated with JO6, does that mean that those activities were required to physically deliver the mail to the customer. Or were they activities that did not necessarily have to be associated with the delivery? Please explain.

RESPONSE:

(a-c) No records exist of this combination.

(d) The carrier handling tubs of trays of mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

(e) No records exist of this combination.

(f) The carrier at the vehicle or on the dock handling trays or tubs of mail.

(g) No records exist of this combination.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-78. For Level 11.4 Activity Code F03 (Hardship):

**(a) What specific physical activity was the data collector observing?
Please explain how that can be determined from the data.**

**(b) Do the data indicate whether and how mail was delivered to that
particular customer? Please explain.**

RESPONSE:

(a) See my response to interrogatory MPA/USPS-T13-73.

(b) No, the work sampling data do not provide that information.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-79. Please provide all systematic written and oral guidance you gave your data collectors (and data processors) on which Level 11.4.1 Activity Detail codes are always or should never be associated with the following Activity codes:

- (a) No Access to Box
- (b) Vehicle Breakdown
- (c) Weather
- (d) Traffic/Detour
- (e) No Work
- (f) Delay-Specify (D08)
- (g) Accountable
- (h) Parcel
- (i) Hardship
- (j) Delay-Specify (F04)
- (k) Parcels
- (l) Mix
- (m) Delivery/Collection
- (n) Loading
- (o) Unloading
- (p) Setup
- (q) Finger @ Delivery
- (r) N/A
- (s) Travel to 1 Delivery
- (t) Travel b/t Delivery
- (u) Travel b/t w/sort
- (v) Return to Unit
- (w) Walking.

RESPONSE:

No specific written or oral instructions other than those in Appendix D were given to the observers and data processors. The Library Reference LR-I-220 was provided to the observers.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-80. Please explain why activity detail H codes (codes for mail collection and receptacle boxes) were used with the following outside activities:

- (a) Finger@Delivery
- (b) N/A
- (c) Delay
- (d) No Access to Box
- (e) Setup
- (f) Travel B/T Deliveries
- (g) Walking
- (h) Hardship.

RESPONSE:

(a-h) The H codes further describe the receptacle or collection box near the carrier. Without specific references to particular records for the code combinations in question, I cannot answer further.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO THE SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS
OF AMERICA, INC.**

MPA/USPS-T13-81. Please explain why a mail receptacle code (activity detail H code), other than drop to customer, was used with the Accountable outside activity.

RESPONSE:

The carrier's main function was with the accountable and other activity details other than drop to customer would indicate the activity taking place with the accountable. Without specific references to particular records for the code combinations in question, I cannot answer further.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-82. For STS Type, Collection Box, please confirm that there are no tallies identifying the carrier either walking or driving to or from a collection box. Please explain why.

RESPONSE:

Confirmed. The Engineered Standards approach only required the observer to record the mode of travel.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-83. There are several tallies at "Collection Box" location which indicate unloading activities. Per Appendix D, "Unloading" (code JO9) applies to vehicles while del/col (code JO8) applies to unloading collection boxes. Please explain what the data collectors were observing when these tallies were taken and explain how you know that.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

**MPA/USPS-T13-84. When a Relay Box is also a Collection Box, how did the
daia collectors indicate location?**

RESPONSE:

**The observers would have recorded the green boxes as a relay box and the blue
boxes as a collection box.**

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

**MPA/USPS-T13-85. When the Relay Box location is associated with "Wait 4
Collectn" activity or "Coll't Box" detail, how did you determine whether it should
be allocated to Collection or Street Support?**

RESPONSE:

I cannot respond without references to the specific records in question, including
CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data
fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-86. For the following tally types, please explain what STS activity the data collectors were observing, how you know that, and why you assigned the specified STS category. Please note that in some cases two or more STS categories are assigned to the same combination of Location-Activity-Activity Detail. In those cases, please explain why you have made distinctions. (If same tally type is included in more than one STS category, in the list below, it is asterisked.)

	STS Category	Location(s)	Activity(ies)	Activity Detail(s)
a.	Drive	In Vehicle at Stop, *Park Point, Vehicle*	Delay Code (D Codes)	N/A
b.	Drive	In Vehicle at Stop, *Misc, On Route, *Vehicle, *Wait When Walking	Delay Codes (D Codes)	Delay Codes (I Codes)
c.	Drive	In Vehicle at Stop*	DelaySpcfyDetail	Delay Codes (G Codes)
d.	Drive	In Vehicle at Stop, Park Point, Vehicle*	N/A	Vehicle Codes (K Codes)
e.	Drive	Vehicle, * Misc, Wait when walking	Delay Codes (D Codes)	Vehicle Codes (K Codes)
f.	Drive	Misc	N/A	Central Inside
g.	Drive	Misc, * Park Point, Vehicle*	N/A	N/A
h.	Drive	On Route	Travel B/t Dlvr.	Walking Push Cart
i.	Drive	On Route, Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
j.	Drive	On Route	Travel to 1 st Dlvr	Vehicle Codes (K Codes)
k.	Drive	Vehicle	Del/Coll	Vehicle Codes (K Codes)
l.	Drive	Vehicle*	Parcel or Accountable	Drop to Customer
m.	Drive	Vehicle*	Parcel or Accountable	N/A
n.	Drive	Vehicle	No Access to Box	Vehicle Codes (K Codes)
o.	CAT	In Vehicle at Stop, * Misc, On Route.	Delay Codes (D Codes)	N/A

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

		Vehicle*		
p.	CAT	In Vehicle at Stop, * In Vehicle Traffic, On Route, * Vehicle*	Delay Codes (D Codes)	Delay Codes (I Codes)
q.	CAT	In Vehicle at Stop, Vehicle*	Delay Codes (D Codes)	Vehicle Codes (K Codes)
r.	CAT	Misc	DelaySpckyDetail	N/A
s.	CAT	Misc, Vehicle*	N/A	Vehicle Codes (K Codes)
t.	CAT	Misc, * On Route, Vehicle*	N/A	N/A
u.	CAT	On Route, Vehicle*	Parcel or Accountable	N/A
v.	CAT	On Route	Travel B/t Divr.	Walking Codes (K Codes)
w.	CAT	Point of Delivery	Travel B/t Divr.	Vehicle Codes (K Codes)
x.	CAT	Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
y.	FAT	Misc, On Route	Delay Codes (D Codes)	N/A
z.	FAT	On Route*	Delay Codes (D Codes)	Delay Codes (I Codes)
aa.	FAT	Vehicle*	Delay Codes (D Codes)	Vehicle Codes (K Codes)
bb.	FAT	Vehicle*	Parcel or Accountable	N/A
cc.	FAT	Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
dd.	FAT	Misc	Walking	Walking Codes (K Codes)
ee.	FAT	Misc	No Work	N/A
ff.	FAT	On Route*	N/A	N/A
gg.	FAT	On Route	No Access to box	N/A
hh.	FAT	On Route, * Vehicle*	Parcel or Accountable	Vehicle Codes (K Codes)
ii.	FAT	On Route, * Vehicle*	Parcel or Accountable	N/A
jj.	FAT	On Route	Travel B/t Divr.	Receptacle Codes (H Codes)
kk.	FAT	On Route	Travel to 1 st Divr.	Walking Codes (K Codes)
ll.	FAT	Vehicle	N/A	Mat'l Handling
mm.	Street Support	Misc	DelaySpckyDetail	Delay Codes (G Codes)
nn.	Street	Misc*	N/A	N/A

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

	Support			
oo.	Street Support	On Route, Vehicle	DelaySpcfyDetail	N/A
pp.	Street Support	On Route	No Work	N/A
qq.	Street Support	Point of Delivery	Return to unit	Vehicle Codes (K Codes)
rr.	Street Support	Vehicle*	N/A	N/A
ss.	Street Support	Vehicle	Mix	Material Handling
tt.	Street Support	Vehicle	Parcels	Material Handling
uu.	Street Support	Vehicle	Delay Codes (D Codes)	N/A
vv.	Street Support	Vehicle	Delay Codes (D Codes)	Union
ww.	Street Support	Wait When Walking	No Work	N/A

RESPONSE:

(a-ww) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-87. For the "Vehicle" location, for foot deliveries, there are some "Travel B/t Divr." activity tallies with either N/A or Walk detail. In some cases, you assign those tallies to Drive Time and in some cases you assign them to the FAT Run or Street Support Time categories.

(a) With the use of a vehicle, what is the distinction between foot, park and loop, central, and dismount deliveries?

(b) What were the data collectors observing at that time and how do you know it?

(c) How did you decide to assign those tallies to the STS categories?

RESPONSE:

(a-c) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-88. For the "On Route" location, for curblin deliveries, there are some "Travel B/t Divr." activity tallies with Walk (Code K) detail. These are assigned to the CAT Run Time category.

(a) What were the data collectors observing at that time and how do you know it?

(b) How did you decide to assign those tallies to the CAT Run Time category?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

.. REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-89. For the "On Route" location, there are some "Travel B/t Divr." activity tallies with Walking Push Cart detail. Some of these are assigned to the Drive Time category and some are assigned to the FAT Run Time category. Separately, there are some "Walking" and "Travel B/t Divr. w/Sort" activity tallies with "Walking Push Cart" detail assigned to the FAT Run Time category. For each of these tally types, please explain:

(a) What were the data collectors observing at those times and how do you know it?

(b) How did you decide to assign those tallies to STS categories?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-90. For the "On Route" location, with curblin deliveries, there are some "Accountable" and "Parcel" activity tallies with "LLV" detail. These are assigned to the FAT Run Time category. Please explain:

(a) What were the data collectors observing at those times and how do you know it?

(b) How did you decide to assign those tallies to the FAT Run Time category?

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

**MPA/USPS-T13-91. Please confirm that you allocate no tallies indicating Curbline
Delivery type to Drive Time.**

RESPONSE:

Confirmed that there are no tallies indicating Curbline Delivery type to Drive time.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

**MPA/USPS-T13-92. Can you tell when the "Travel B/t Divr." tally occurred
between a curblīne and another type of deliver? If so, please explain.**

RESPONSE:

**Yes, the observers had the USPS Form 3999x that lists the entire route with
delivery types by delivery point.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-93. Assume a carrier has just stopped his vehicle at a parking point for either a set of Central or Dismount deliveries within a single building:

- (a) If he has not yet left the vehicle, what location would a data collector record: In Vehicle at Stop, On Route, or Vehicle?**
- (b) If he is working at his vehicle (e.g., unloading a tray of mail), what location would a data collector record?**
- (c) If he has left the vehicle and is proceeding to make his deliveries but has not yet gotten to the first delivery, what location would a data collector record?**
- (d) If he has reached the first delivery and is moving towards the next, what location would a data collector record?**
- (e) If he is returning to his vehicle from the last delivery on that stop, what location would a data collector record?**

RESPONSE:

(a-e) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-94. With some minor exceptions, virtually all tallies, regardless of Location Code, which have "Delay Specify Detail" or N/A activity with a Code G activity detail (e.g., public relations, service rates, directions, excess words), have been allocated to Load.

(a) Please explain why you have done this.

(b) Please explain why a few of these types of tallies were also allocated to Street Support and Drive Time.

RESPONSE:

(a-b) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-95. Please confirm that all the "Hardship" activity tallies have been allocated to Load. Please explain why you have done this.

RESPONSE:

This appears to be the case. Generally, because the "Hardship" activity requires customer contact, it falls within Load Time. See Appendix F to my testimony. I cannot respond further without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35

MPA/USPS-T13-96. Please confirm that, with only minor exceptions, virtually all tallies for the "Point of Delivery" location were allocated to the Load or Street Support category. Please explain why you have done this.

RESPONSE:

Not exactly. Based on time-consuming review of all of the 16,052 tallies containing "Point of Delivery" as a location, I confirm that, with a few extremely rare exceptions, that virtually all of tallies with "Point of Delivery" were allocated to Load time. Only 4 out of 16,052 were tallies allocated to Street Support. Only 2 tallies out of 16,052 tallies with Point of Delivery were allocated to some other STS category, which, in this case, was Route Access CAT time.

The reason why virtually all were categorized as Load Time is fairly straightforward. The following is the definition of Load Time used in the preparation of USPS LR-163 used by witness Baron: "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and the providing of special services." In accord with this definition, the location of the activities being performed are "at residential and business delivery points", and, coincidentally, the ES work sampling had a location "Point of Delivery". The carrier had finished accessing/traveling to and was located at the point of delivery.

Additional fields are necessary to define what the carrier is doing at the "Point of Delivery," but the expected action is for the carrier to be delivering and or collecting the mail, which would generally place the tallies into Load Time.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35

Following this response are pages showing the result of an Access query that identifies the combinations of tallies with "Point of Delivery". There are 338 groups of tallies that represent 16,046 tallies of Load Time out of the total of 16052 tallies with Point of Delivery. In general, the location of Point of Delivery combined with the Activity, Del/Coll or Finger @ Deliver, and Parcel or Accountable with the Activities Detail of Drop to Customer place the carrier actions within the definition of Load Time. To assign the STS category, the Location was reviewed with Activities, then the Activities Details, followed by the Delivery Type and the Delivery Type Status. Additional resources, such as the comments logs, USPS form 3999x, and the field produced work sampling reports with observer notes, were, on rare occasions, accessed to support the assignment of the tallies into the STS categories. For additional information, please see my response to Presiding Officer's Information Request No. 8.

As noted, a very few tallies were placed in Street Support. (There were only three permutations of scans with a total of 4 tallies that were assigned to Street Support time.) This is the definition used for Street Support time: "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The first permutation, totalling two tallies, had the carrier at a Resident Outside, Central (NDCBU), doing Setup, with the Activity Detail LLV. The Setup and LLV combination places these tallies into Street Support time. The second permutation had only one tally, with the carrier

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35**

at a Resident Outside, Curb, Return to Unit, with the Activity Detail of LLV. The combination of Return to Unit and LLV along with Curb placed this tally into Street Support time. The third permutation also had only one tally, for a Business Inside which was to be a Dismount, and the carrier was doing a Setup. N/A is in the Activity Detail. The presence of the Setup field ultimately placed this tally into Street Support time.

The only other exception to the assignment of Point of Delivery to the STS categories of Load Time is one permutation with two tallies that were placed into Route Access CAT time. Route/Access CAT time was defined as: "Vehicle driving time on the curblane portions of routes. Also includes the time spent driving up to curblane stops to load mail into and to collect mail from customer boxes." These two tallies out of the total of 16,052 with Point of Delivery were placed in CAT because the carrier was on a Resident Outside, Curb, Travel B/t Dlv, in an LLV. which fits the CAT definition.

STS Type	SiteLocationCode	Site_Location	PersonalCode	Personal or Admin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activity Detail	Count
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H08	# 1 Box Central	3635	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H13	Outside	2474	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H11	Gang Box	899	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Slam	788	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J08	Del/Col.	H12	Central Inside	780	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H07	# 1-1/2 Box	654	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H06	# 1 Box	654	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	549	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	337	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H08	# 2 Box	312	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H11	Gang Box	256	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	247	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H11	Gang Box	217	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	215	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J08	Del/Col.	H13	Central Outside	203	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H07	# 1-1/2 Box	196	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	180	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J12	Finger @ Deliver	H13	Central Outside	173	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Slam	167	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F02	Parcel	H10	Drop to Cust	142	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J08	Del/Col.	H10	Drop to Cust	141	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	133	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	J08	Del/Col.	H12	Central Inside	129	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H10	Drop to Cust	124	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H08	Flat Receptacle	123	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H10	Drop to Cust	121	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F01	Accountable	H10	Drop to Cust	117	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F02	Parcel	H10	Drop to Cust	112	
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H10	Drop to Cust	85	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H03	2 Handed Slot	84	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H06	# 2 Box	63	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	62	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J08	Del/Col.	H12	Central Inside	62	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F01	Accountable	H10	Drop to Cust	56	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	55	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J12	Finger @ Deliver	H12	Central Inside	51	

Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H06	# 1 Box	48
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J08	Del/Col.	H12	Central Inside	44
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	44
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	43
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Stam	42
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H06	# 1 Box Central	40
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J11	Setup	H13	Central Outside	36
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F01	Accountable	H10	Drop to Cust	36
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F02	Parcel	H10	Drop to Cust	32
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F01	Accountable	H10	Drop to Cust	32
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H11	Gang Box	31
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H09	1 Hand Stam	30
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	F01	Accountable	H10	Drop to Cust	27
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H01	LLV	25
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F02	Parcel	H13	Central Outside	25
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H05	Receipts	24
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H10	Drop to Cust	23
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F02	Parcel	H10	Drop to Cust	22
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H12	Central Inside	22
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H01	Illegal Mail Box	21
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H10	Drop to Cust	19
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H06	# 1 Box	19
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H08	# 2 Box	17
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H03	2 Handed Slot	16
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H01	Illegal Mail Box	16
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H11	Gang Box	15
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F04	Delay/SpecyDetail	G04	Excess Wrts Cust	15
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J12	Finger @ Deliver	H02	1 Handed Slot	13
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	J06	Del/Col.	H10	Drop to Cust	13
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H07	# 1-1/2 Box	13
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H07	# 1-1/2 Box	13
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H01	LLV	13
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S00	N/A	J08	Del/Col.	H13	Central Outside	13
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J12	Finger @ Deliver	H13	Central Outside	12
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	F02	Parcel	H10	Drop to Cust	12
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H03	2 Handed Slot	12
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F01	Accountable	H00	N/A	10
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H04	Slot below knees	10

Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H09	1 Hand Slam	9
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F02	Parcel	H10	Drop to Cust	9
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Business	T02	Travel B/ Dvr.	K01	LLV	9
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Resident Outside	J06	Del/Col.	H09	1 Hand Slam	9
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J06	Del/Col.	H07	# 1-1/2 Box	9
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J06	Del/Col.	H10	Drop to Cust	8
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Resident Business	F01	Accountab le	H10	Drop to Cust	8
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F02	Parcel	H00	N/A	8
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J06	Del/Col.	H13	Central Outside	7
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J06	Del/Col.	H10	Drop to Cust	7
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Business	J06	Del/Col.	H06	# 2 Box Central	7
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Resident Outside	J06	Del/Col.	H12	Inside	7
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H02	1 Handed Slot	6
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Business	T02	Travel B/ Dvr.	K01	LLV	6
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Resident Inside	F01	Accountab le	H10	Drop to Cust	6
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Resident Business	J12	Finger @ Deliver	H12	Central Inside	6
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J06	Del/Col.	H09	1 Hand Slam	6
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Resident Business	J06	Del/Col.	H10	Drop to Cust	6
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F01	Accountab le	H10	Drop to Cust	6
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Resident Business	J06	Del/Col.	H10	Drop to Cust	5
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Resident Business	J06	Del/Col.	H06	N/A	5
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	J06	Del/Col.	H10	Drop to Cust	5
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H11	Gang Box	5
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J06	Del/Col.	H01	Illegal Mail Box	5
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S00	N/A	J06	Del/Col.	H06	# 1 Box	5
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Resident Business	J06	Del/Col.	H10	Drop to Cust	5
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J06	Del/Col.	H06	# 1 Box	5
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Resident Business	J06	Del/Col.	H06	# 2 Box	4
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J06	Del/Col.	H01	Illegal Mail Box	4
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H03	2 Handed Slot	4
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Resident Business	J06	Del/Col.	H06	# 1 Box	4
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F04	DelaySpd yDetail	G04	Excess Wrds Cust	4
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J06	Del/Col.	H12	Central Inside	4
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J06	Del/Col.	H09	N/A	4
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J12	Finger @ Deliver	H12	Central Inside	4
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Resident Business	F04	DelaySpd yDetail	G04	Excess Wrds Cust	4
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Resident Business	J06	Del/Col.	H03	2 Handed Slot	4

Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J12	Finger @ Deliver	H12	Central Inside	4
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F01	Accountable	G04	Excess Wrds Cust	4
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H13	Central Outside	4
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F04	DelaySpcl yDetail	G04	Excess Wrds Cust	4
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	F02	Parcel	H10	Drop to Cust	3
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J08	Del/Col.	H07	# 1-1/2 Box	3
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	F04	DelaySpcl yDetail	G05	Excess Wrds Carr	3
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	3
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H02	1 Handed Slot	3
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H08	1 Hand Star	3
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J11	Setup	H06	# 1 Box	3
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H04	Slot below Inrees	3
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J11	Setup	K01	LLV Central	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H12	Central Inside	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	F01	Accountable	H10	Drop to Cust	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H02	1 Handed Slot Flat	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H05	Receipt # 1 Hand Star	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H09	1 Hand Star	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	F01	Accountable	H10	Drop to Cust	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F01	Accountable	H00	N/A	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F02	Parcel	H00	N/A	3
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H12	Central Inside	3
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	F04	DelaySpcl yDetail	G01	Public Relations	3
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	F01	Accountable	H10	Drop to Cust	3
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J11	Setup	K01	LLV	3
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H05	Flat Receipt #	3
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S00	N/A	J08	Del/Col.	H12	Central Inside	3
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F01	Accountable	G04	Excess Wrds Cust	3
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F02	Parcel	H00	N/A	3
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F04	DelaySpcl yDetail	G04	Excess Wrds Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H04	Slot below Inrees	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F02	Parcel	K10	Walk Flat	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J12	Finger @ Deliver	H08	# 2 Box	2

Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J06	Del/Col.	H02	1 Handed Slot	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F02	Parcel Finger @	K10	Walk Flat	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J12	Deliver	H06	# 1 Box	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J06	Del/Col.	H11	Gang Box	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T02	Travel Bt Divr.	K10	Walk Flat	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T03	Travel Bt Divr.	K10	Walk Flat	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S00	N/A	D06	Delay - Specify	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S00	N/A	J06	Del/Col.	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J06	Del/Col.	H11	Gang Box	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	D06	Delay - Specify	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	F02	Parcel	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J11	Setup Finger @	K01	LLV Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J12	Deliver	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	T02	Travel Bt Divr.	K10	Walk Flat	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	F01	Accountab le	K09	Walking Public	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	F04	DelaySpf yDetail	G01	Relations	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F04	DelaySpf yDetail	G04	Excess Wrtis Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	T02	Travel Bt Divr.	H06	# 1 Box	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F04	DelaySpf yDetail	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	T00	N/A	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J06	Del/Col.	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	D06	Delay - Specify	H06	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J06	Del/Col.	K01	LLV	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	F02	Parcel	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	D06	Delay - Specify	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	T02	Travel Bt Divr.	K10	Walk Flat	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J11	Setup Finger @	K01	LLV	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Deliver	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	T05	Walking	H12	Central Inside	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J06	Del/Col.	H13	Central Outside	2
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J06	Del/Col.	H06	1 Hand Stam	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F01	Accountab le	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J06	Del/Col.	H12	Central Inside	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	F02	Parcel	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F01	Accountab le	H06	# 1 Box	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J06	Del/Col.	H06	Flat Receptacl e	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	J06	Del/Col.	H00	N/A	2

Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J06	Del/Col.	H03	2 Handed Slot	2
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J11	Setup	H12	Central Inside	2
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	F01	Accountable	H10	Drop to Cust	2
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J06	Del/Col.	H00	N/A	2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J06	Del/Col.	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J06	Del/Col.	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J06	Del/Col.	H06	Walking	1
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H01	Illegal Mail Box	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J06	Del/Col.	H03	2 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	T00	N/A	H02	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J06	Del/Col.	H05	Flat Receptacle	1
Load Time L12	Point of Deliver	C05	Other - Specify	WT05	Central	S01	Business Inside	F01	Accountable	H12	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	T00	N/A	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	T05	Walking	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S00	N/A	D06	Delay - Specify	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	F04	DelaySpcl yDetail	G04	Excess Wrds Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	F04	DelaySpcl yDetail	G04	Excess Wrds Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	D06	Delay - Specify	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F02	Parcel	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S00	N/A	T00	N/A	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S00	N/A	J12	Finger @ Deliver	H06	1 Hand Slam	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	J06	Del/Col.	H05	Flat Receptacle	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	F01	Accountable	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S00	N/A	J06	Del/Col.	H02	1 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J06	Del/Col.	H11	Gang Box	1
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	T02	Travel B/T Dvr.	K10	Walk Flat	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F03	Hardship	G01	Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	F04	DelaySpcl yDetail	G01	Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J06	Del/Col.	H03	2 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J12	Finger @ Deliver	H00	Jeep	1
Load Time L12	Point of Deliver	C02	Forms	WT05	Central	S04	Resident Outside	T00	N/A	H00	N/A	1
Load Time L12	Point of Deliver	C05	Other - Specify	WT05	Central	S02	Business Outside	J06	Del/Col.	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	T05	Walking	K10	Walk Flat	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	J06	Del/Col.	H12	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J12	Finger @ Deliver	H03	2 Handed Slot	1

Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	T05	Waiting	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F04	DelaySpcl yDetail	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	D01	No access to Box	H01	Parking Unavail
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	D01	No access to Box	H06	# 1 Box
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S03	Resident Inside	J06	Del/Col.	H06	# 1 Box
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J12	Finger @ Deliver	H07	# 1-1/2 Box
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F01	Accountab le	H00	N/A
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	T02	Travel BA Dvr.	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F01	Accountab le	K10	Walk Flat
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J12	Finger @ Deliver	K01	LLV
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J06	Del/Col.	H02	1 Handed Slot # 1-1/2
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S00	N/A	J06	Del/Col.	H07	Box Flat
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J06	Del/Col.	H05	Receipt
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S00	N/A	J12	Finger @ Deliver	H06	# 1 Box
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J12	Finger @ Deliver	H11	Gang Box
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J11	Setup	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F03	Hardship	G01	Public Relations
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F01	Accountab le	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J12	Finger @ Deliver	H06	# 1 Box
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F02	Parcel	H06	# 1 Box
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F04	DelaySpcl yDetail	G05	Excess Wrds Carr
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F03	Hardship	G01	Public Relations
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F03	Hardship	H06	# 1 Box
Load Time L12	Point of Deliver	C02	Forms	WT01	Foot	S04	Resident Outside	J06	Del/Col.	H13	Central Outside
Load Time L12	Point of Deliver	C02	Forms	WT05	Central	S02	Business Outside	J06	Del/Col.	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J06	Del/Col.	H01	Illegal Mail Box
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	F04	DelaySpcl yDetail	G01	Public Relations
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F02	Parcel	H06	# 1 Box
Load Time L12	Point of Deliver	C02	Forms	WT05	Central	S00	N/A	T00	N/A	H00	N/A
Load Time L12	Point of Deliver	C02	Forms	WT05	Central	S00	N/A	F01	Accountab le	H00	N/A
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	F02	Parcel	G04	Excess Wrds Cust
Load Time L12	Point of Deliver	C02	Forms	WT03	Park & Loop	S04	Resident Outside	J06	Del/Col.	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	F01	Accountab le	H00	N/A
Load Time L12	Point of Deliver	C02	Forms	WT05	Central	S04	Resident Outside	F01	Accountab le	H13	Central Outside
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S00	N/A	J12	Finger @ Deliver	K01	LLV
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J06	Del/Col.	H09	1 Hand Stam

Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J06	Del/Col	H06	# 2 Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J06	Del/Col	H02	1 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F01	Accountable	H09	1 Hand Stam	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F01	Accountable	K10	Walk Flat	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F02	Parcel	H09	1 Hand Stam	1
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	F01	Accountable	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F02	Parcel	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J06	Del/Col	G01	Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	D01	No access to Box	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J12	Finger @ Deliver	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S00	N/A	F01	Accountable	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T02	Travel B/ Dvr.	H09	1 Hand Stam	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T00	N/A	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F03	Hardship	K01	LLV	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J06	Del/Col	H00	N/A Flat Receptacle	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H05		1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	D01	No access to Box	H12	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F02	Parcel	K09	Walking	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	F02	Parcel	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	F01	Accountable	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	F01	Accountable	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	F01	Accountable	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	T02	Travel B/ Dvr.	K11	Walk Obst	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J12	Finger @ Deliver	K01	LLV	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J12	Finger @ Deliver	H09	1 Hand Stam	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J12	Finger @ Deliver	H06	# 2 Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J12	Finger @ Deliver	H06	# 1 Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J11	Setup	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	F02	Parcel	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J11	Setup	K01	LLV	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S03	Resident Inside	J06	Del/Col	H09	1 Hand Stam	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	D06	Delay - Specify	H11	Gang Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J06	Del/Col	H02	1 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J06	Del/Col	H01	Illegal Mail Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	F04	Delay/Specfy Detail	G04	Excess Wrds Cust	1

Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	F04	Delay/Spec yDetail	G01	Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	T02	Travel B/T Dvr.	H10	Walk Flat Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	T02	Travel B/T Dvr.	H10	Slot below Inves	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver	H04	Jeep	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J11	Setup	K00	Flat Receptac e	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H05	Directions	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F01	Accountab le	G03	Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	F04	Delay/Spec yDetail	G01	Multiple Box Typ Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	D01	No access to Box	H16	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	T00	N/A	G01	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Business	J11	Setup	H12	LLV	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	T02	Travel B/T Dvr.	K01	LLV	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J11	Setup	K01	LLV	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J11	Setup	K00	Jeep	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Business	J08	Del/Col.	G04	Excess Wrds Cust Central Outside Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	F02	Parcel	H13	Service Rates	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	J11	Setup	H12	1 Handed Slot Illegal Mail Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	F04	Delay/Spec yDetail	G02	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H02	1 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H01	1 Handed Slot # 1-1/2 Box	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J04	Parcels	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J12	Finger @ Deliver	H02	Central Inside	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J08	Del/Col.	H07	1 Hand Stem 2 Handed Slot	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J11	Setup	H12	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H09	Excess Wrds Carr	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H03	ILLV	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H13	# 2 Box Multiple Box Typ	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H16	ILLV	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	K01	Illegal Mail Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H01	# 1-1/2 Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H07	# 2 Box	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver	H08	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	D08	Delay - Specify	H00	N/A	1

Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Coil	G04	Excess Wrds Cust Flat	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	F01	Accountable	H05	Receipt e	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S00	N/A	J08	Del/Coil	H11	Gang Box	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F03	Hardship	H10	Drop to Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F03	Hardship	H00	N/A	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F03	Hardship	G01	Public Relations	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F02	Parcel	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F02	Parcel	H09	Hand Stamp	1
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S00	N/A	J12	Finger @ Deliver	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F02	Parcel	G04	Excess Wrds Cust	1
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F01	Accountable	H13	Central Outside	1
Load Time L12	Point of Deliver	A00	N/A	WT04	Diamond	S04	Resident Outside	J12	Finger @ Deliver	H10	Drop to Cust	1
Route/Access (CAT) L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	T02	Travel B/t Dvr.	K01	LLV	2
Street Support Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J11	Setup	K01	LLV	2
Street Support Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	T04	Return to Unit	K01	LLV	1
Street Support Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J11	Setup	H00	N/A	1
											Total Tallies	16052

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35

MPA/USPS-7 13-97. Please confirm that, with the exception of Collection and Relay Box Locations, virtually all Del/Coll tallies were allocated to the Load or Street Support category. Please explain why you have done this.

RESPONSE:

Not confirmed. In response to this interrogatory, I have undertaken a time-consuming review of all 13,969 tallies containing the Activity of Del/Coll. 13,857 of these tallies were allocated to Load time. Only 43 of the tallies were allocated to Street Support time. Only 64 were allocated to Collection time. 5 tallies were allocated to Drive time. Let me also note that your question contains a logical flaw. The Relay box - Del/Coll. permutations were assigned to Street Support, and thus, cannot fall within the exception posited in your question.

Although I did not confirm, let me provide additional explanation of what actually occurred. The following is the definition of Load Time used in the preparation of USPS LR-163 used by witness Baron: "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and the providing of special services." Note that, in accord with this definition, the location of the activities being performed are "at residential and business delivery points", and, coincidentally, the ES work sampling had a location "Point of Delivery". The carrier had finished accessing/traveling to and was located at the point of delivery. Additional fields are necessary to define what the carrier is doing at the "Point of Delivery," but the expected action is for the carrier to be delivering and or collecting the mail, which would generally place the tallies into Load Time.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35

Attached to this response are pages showing the result of an Access query that identifies the combinations of scans with "Point of Delivery." There are 228 groups of tallies that represent 13,969 total tallies and, of these, Load Time has 13,857 tallies with Del/Coll. In general, the location of Point of Delivery combined with the Activity, Del/Coll, places the carrier actions within the definition of Load Time. To assign the STS category, the Location was reviewed with Activities, then the Activities Details, followed by the Delivery Type and the Delivery Type Status. Additional resources such as the comments logs, USPS form 3999x, and the field produced work sampling reports with observer notes were on rare occasions accessed to support the assignment of the tallies into the STS categories. For additional information, please see my response to Presiding Officer's Information Request No. 8.

There are six permutations, with a total of 43 tallies, containing the combination of Del/Coll. with Relay Box, and all of these combinations were assigned to Street Support time. The following is the definition of Street Support time used: "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The Del/Coll. is the handling process of the carrier delivering and/or collecting mail. This Activity, when used with the Relay box location, describes a carrier restocking, which, by definition, is Street Support.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35**

There are 21 permutations with a total of 64 tallies that had Collection Box as the location and the Activity of Del/Coll.. 17 of the 21 permutations with a total of 60 tallies had the addition of the Activity Detail as Coll't Box. The definition Collection time used was "The time spent walking up to and sweeping Express mail and non-Express mail collection boxes. The time spent driving vehicles up to the collection stops is included in Driving Time, as discussed above." Because the Location was Collection Box, the Activity was Del/Coll, and the Activity Detail was Coll't Box, it was fairly straightforward to place these tallies into Collection Time. The four remaining permutations, each with 1 tally, were also placed into Collection time, after review of the Delivery Type and Delivery Type Status. There are three additional permutations, with a total of 5 tallies with the Activity of Del/Coll., that were not assigned to Load or Street Support time, but were placed in Driving time.

STS Type	Site Location Code	Site Location	Personal Code	Personal Admin	Delivery Type Code	Delivery Type	Delivery Status Code	Delivery Status	Activities Code	Activities	Activities Detail Code	Activity Detail	Count	
Collection Box	L10	Collection Box	A00	N/A	WT04	Dismount	S02	Business Outside	J08	Del/Col.	H15	Coft Box	6	
Collection Box	L10	Collection Box	A00	N/A	WT05	Central	S00	N/A	J08	Del/Col.	H15	Coft Box	7	
Collection Box	L10	Collection Box	A00	N/A	WT04	Dismount	S01	Business Inside	J08	Del/Col.	H15	Coft Box	7	
Collection Box	L10	Collection Box	A00	N/A	WT05	Central	S03	Resident Inside	J08	Del/Col.	H15	Coft Box	8	
Collection Box	L10	Collection Box	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H15	Coft Box	8	
Collection Box	L10	Collection Box	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H15	Coft Box	4	
Collection Box	L10	Collection Box	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H15	Coft Box	5	
Collection Box	L10	Collection Box	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H15	Coft Box	3	
Collection Box	L10	Collection Box	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H15	Coft Box	3	
Collection Box	L10	Collection Box	A00	N/A	WT04	Dismount	S00	N/A	J08	Del/Col.	H15	Coft Box	3	
Collection Box	L10	Collection Box	A00	N/A	WT05	Central	S02	Business Outside	J08	Del/Col.	H15	Coft Box	2	
Collection Box	L10	Collection Box	A00	N/A	WT05	Central	S01	Business Inside	J08	Del/Col.	H15	Coft Box	2	
Collection Box	L10	Collection Box	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H15	Coft Box	2	
Collection Box	L10	Collection Box	A00	N/A	WT03	Park & Loop	S00	N/A	J08	Del/Col.	H15	Coft Box	2	
Collection Box	L10	Collection Box	A00	N/A	WT02	Curb	S00	N/A	J08	Del/Col.	H15	Coft Box	2	
Collection Box	L10	Collection Box	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H00	N/A	1	
Collection Box	L10	Collection Box	A00	N/A	WT00	N/A	S00	N/A	J08	Del/Col.	H13	Central Outside	1	
Collection Box	L10	Collection Box	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H15	Coft Box	1	
Collection Box	L10	Collection Box	A00	N/A	WT01	Foot	S01	Business Inside	J08	Del/Col.	H15	Coft Box	1	
Collection Box	L10	Collection Box	A00	N/A	WT03	Loop	S00	N/A	J08	Del/Col.	H00	N/A	1	
Collection Box	L10	Collection Box	A00	N/A	WT02	Curb	S00	N/A	J08	Del/Col.	H00	N/A	1	541 Collection
Driving Time	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	K01	LLV	3	
Driving Time	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business Inside	J08	Del/Col.	K01	LLV	1	
Driving Time	L08	Vehicle	A00	N/A	WT05	Central	S01	Business Inside	J08	Del/Col.	K01	LLV	1	51 Drive Time
Load Time L12		Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	3835	
Load Time L12		Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	2474	
Load Time L12		Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H11	Gang Box	889	
Load Time L12		Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Stam	786	
Load Time L12		Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J08	Del/Col.	H12	Central Inside	780	
Load Time L12		Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H07	# 1-12 Box	654	
Load Time L12		Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	649	
Load Time L12		Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	337	
Load Time L12		Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H08	# 2 Box	312	
Load Time L12		Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H11	Gang Box	256	
Load Time L12		Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H08	# 1 Box	247	
Load Time L12		Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	215	
Load Time L12		Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J08	Del/Col.	H13	Central Outside	203	
Load Time L12		Point of Deliver	A00	N/A	WT03	Park & Loop	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	180	
Load Time L12		Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H06	1 Hand Stam	167	
Load Time L08		Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H08	# 1 Box	166	
Load Time L12		Point of Deliver	A00	N/A	WT04	Dismount	S02	Business Outside	J08	Del/Col.	H10	Drop to Cust	141	
Load Time L12		Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	133	
Load Time L12		Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	J08	Del/Col.	H12	Central Inside	129	

Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H10	Drop to Curb	124	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H05	Flat Receptacle	123	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H10	Drop to Curb	121	
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H10	Drop to Curb	86	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H03	2 Handed Slot	84	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	82	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J08	Del/Col.	H12	Central Inside	82	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	86	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Resident Outside	J08	Del/Col.	H06	# 1 Box	48	
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	44	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J08	Del/Col.	H12	Central Inside	44	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	J08	Del/Col.	H10	Drop to Curb	43	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Stair	42	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H05	Flat Receptacle	24	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S02	Business Outside	J08	Del/Col.	H10	Drop to Curb	23	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H12	Central Inside	22	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H01	Regal Mail Box	21	
Load Time L08	Vehicle Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	21	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H10	Drop to Curb	18	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Resident Outside	J08	Del/Col.	H08	# 2 Box	17	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H01	Regal Mail Box	16	
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H03	2 Handed Slot	16	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H11	Gang Box	15	
Load Time L08	Vehicle Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H06	# 2 Box	13	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H07	# 1-1/2 Box	13	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S00	N/A	J08	Del/Col.	H13	Central Outside	13	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside	J08	Del/Col.	H10	Drop to Curb	13	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H07	# 1-1/2 Box	13	
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H03	2 Handed Slot	12	
Load Time L13	On Route	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Stair	10	
Load Time L13	On Route	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	10	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Business Outside	J08	Del/Col.	H04	Slot below	10	
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S02	Resident Outside	J08	Del/Col.	H06	1 Hand Stair	9	
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H07	# 1-1/2 Box	9	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J08	Del/Col.	H10	Drop to Curb	8	
Load Time L13	On Route	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	8	
Load Time L13	On Route	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H13	Central Outside	8	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H10	Drop to Curb	7	
Load Time L13	On Route	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	7	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	J08	Del/Col.	H13	Central Outside	7	
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J08	Del/Col.	H12	Central Inside	7	
Load Time L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H08	# 2 Box	7	
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Stair	6	

Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H10	Drop to Cust	8		
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S00	N/A	J08	Del/Col.	H06	# 1 Box	5		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S01	Business Inside	J08	Del/Col.	H00	N/A	5		
Load Time L08	Vehicle	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H10	Drop to Cust	5		
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H10	Drop to Cust	5		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H01	Illegal Mail Box	5		
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	5		
Load Time L08	Vehicle	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	5		
Load Time L08	Vehicle	A00	N/A	WT02	Curb	S04	Outside	J08	Del/Col.	H01	LLV	5		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S03	Resident Inside	J08	Del/Col.	H10	Drop to Cust	5		
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S02	Business Outside	J08	Del/Col.	H10	Drop to Cust	5		
Load Time L13	On Route	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H09	1 Hand Slam	4		
Load Time L13	On Route	A00	N/A	WT04	Demount	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	4		
Load Time L08	Vehicle	A00	N/A	WT04	Demount	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	4		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S02	Business Outside	J08	Del/Col.	H03	2 Handed Slot	4		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H01	Illegal Mail Box	4		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S04	Resident Outside	J08	Del/Col.	H00	N/A	4		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H13	Central Outside	4		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S02	Business Outside	J08	Del/Col.	H06	# 1 Box	4		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S02	Business Outside	J08	Del/Col.	H08	# 2 Box	4		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H12	Central Inside Flat	4		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H05	Receptacle	3		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S01	Business Inside	J08	Del/Col.	H12	Central Inside	3		
Load Time L13	On Route	A00	N/A	WT03	Loop	S04	Resident Outside	J08	Del/Col.	K10	Walk Flat	3		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H02	1 Handed Slot	3		
Load Time L12	Point of Deliver	A00	N/A	WT04	Demount	S02	Business Outside	J08	Del/Col.	H07	# 1-1/2 Box	3		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S01	Business Inside	J08	Del/Col.	H05	Flat Receptacle	3		
Load Time L13	On Route	A00	N/A	WT03	Loop	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	3		
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	3		
Load Time L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H10	Drop to Cust	3		
Load Time L12	Point of Deliver	A00	N/A	WT04	Central	S00	N/A	J08	Del/Col.	H12	Central Inside	3		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S01	Business Inside	J08	Del/Col.	H02	1 Handed Slot	3		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S02	Business Outside	J08	Del/Col.	H09	1 Hand Slam	3		
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S02	Business Outside	J08	Del/Col.	H09	1 Hand Slam	3		
Load Time L08	Vehicle	A00	N/A	WT04	Demount	S04	Resident Outside	J08	Del/Col.	H06	1 Hand Slam	3		
Load Time L12	Point of Deliver	A00	N/A	WT03	Loop	S04	Resident Outside	J08	Del/Col.	H12	Central Inside	3		
Load Time L13	On Route	A00	N/A	WT01	Foot	S01	Business Inside	J08	Del/Col.	H10	Drop to Cust	3		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H04	Slot below Inset	3		
Load Time L13	On Route	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H02	1 Handed Slot	3		
Load Time L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H07	# 1-1/2 Box	3		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H09	1 Hand Slam	2		
Load Time L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Col.	H01	LLV	2		
Load Time L08	Vehicle	A00	N/A	WT03	Loop	S04	Resident Outside	J08	Del/Col.	H06	# 1 Box	2		

Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S03	Resident Inside	J08	Del/Col.	H11	Gang Box	1		
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H01	LLV	1		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H03	2 Handed Slot	1		
Load Time L12	Point of Deliver	A00	N/A	WT05	Central	S00	N/A	J08	Del/Col.	H11	Gang Box	1		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	J08	Del/Col.	H12	Central Inside	1		
Load Time L12	Point of Deliver	A00	N/A	WT06	Central	S02	Business Outside	J08	Del/Col.	H00	N/A Flat	1		
Load Time L12	Point of Deliver	A00	N/A	WT01	Foot	S01	Business Inside	J08	Del/Col.	H05	Receipts	1		
Load Time L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J08	Del/Col.	H08	# 2 Box	1	13857	Load Time
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H00	N/A	26	
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S00	N/A	J08	Del/Col.	H00	N/A	11	
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Col.	H15	Coft Box	2	
Street Support Time	L11	Relay Box	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Col.	H00	N/A	2	
Street Support Time	L11	Relay Box	A00	N/A	WT04	Dismount	S01	Business Inside	J08	Del/Col.	H15	Coft Box	1	
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Col.	H00	N/A	1	43 StreetSupport
												13869		

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-98. Please explain why tallies with the activity of "No Access to Box" were allocated among the Drive, Load, and FAT Run Time categories.

RESPONSE:

It appears, with respect to "No Access to Box", in allocating the tallies to Load, the carrier was at the point of delivery. In allocating a tally to driving time, the carrier was in his vehicle on a park and loop route. In allocating tallies to route access/Fat, the tallies show the carrier on route, and not associated with a vehicle. I cannot respond further without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-99. Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the "Load" category:

	Location	Delivery Type	Activity(ies)	Detail(s)
a.	N/A	Central	Del/Coll	Central Outside
b.	N/A	N/A	Del/Coll	Central Inside
d.	On Route	Central	N/A	Central Inside
e.	On Route or Park Point	Any Delivery Type (WT Codes)	Del/Coll or Finger @ Delivery	Any Receptacle Type (H Codes)
g.	On Route	Curb	Accountable	#1 Box
h.	On Route	Curb	Del/Coll	Drop to Customer
i.	On Route	Curb	Del/Coll	Walking
j.	On Route	Curb	Parcel	Drop to Customer
k.	On Route	Dismount	Accountable	Flat Receptacle
l.	On Route	Dismount	Finger @ Delivery	Walk Flat
m.	On Route	Dismount	Parcel or Accountable	Walk Flat
n.	On Route	Dismount	Walking	Walk Flat
o.	On Route	Park & Loop	Accountable	Walk Flat
p.	On Route	Park & Loop	Del/Coll	Walk Flat
q.	On Route	Park & Loop	Del/Coll	N/A
r.	On Route	Park & Loop	Finger @ Delivery	Walk Flat
t.	Point of Delivery	Central	Accountable	Flat Receptacle
u.	Point of Delivery	Any Delivery Type (WT Codes)	Parcels, Parcel or Accountable	N/A
v.	Point of Delivery	Central	Del/Coll	Drop to Customer
w.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll	N/A
x.	Point of Delivery	Central	N/A	Central Inside
y.	Point of Delivery	Any Delivery Type (WT Codes)	N/A	N/A
z.	Point of Delivery	Central, Dismount, Foot or Park & Loop	Setup	Vehicle Codes (K Codes)

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

aa.	Point of Delivery	Central	Travel B/t Divr.	Central Outside
bt.	Point of Delivery	Central	Walking	Central Inside or Outside
cc.	Point of Delivery	Central	Walking	Walk Flat
dd.	Point of Delivery	Curb	Del/Coll	1 Handed Slot
ee.	Point of Delivery	Curb	Del/Coll or Finger @ Delivery	Drop to Customer
ff.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
gg.	Point of Delivery	Any Delivery Type Codes (WT Codes)	Travel B/t Divr.	Walk of Vehicle Codes (K Codes)
hh.	Point of Delivery	Curb	Travel B/t Divr.	Walk Flat
ii.	Point of Delivery	Dismount	Parcel or Accountable	Walk Codes (K Codes)
jj.	Point of Delivery	Dismount	Delay (D Code)	Gang Box
kk.	Point of Delivery	Dismount	Travel B/t Divr.	Any Receptacle Type (H Codes)
ll.	Point of Delivery	Any Delivery Type Codes (WT Codes)	Del/Coll	Walk Code (K Codes)
mm.	Point of Delivery	Park & Loop	Travel B/t Divr.	1 Hand Slam
nn.	Vehicle	Curb	Del/Coll or Finger @ Delivery	Receptacle Codes (H Codes)
oo.	Vehicle	Central, Dismount, Park & Loop	Del/Coll or Finger @ Delivery	Receptacle Codes (H Codes)
pp.	Vehicle	Central, Dismount, Park & Loop	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
qq.	Vehicle	Curb	Del/Coll	Drop to Customer
rr.	Vehicle	Curb	Del/Coll Or Finger @ Delivery	Vehicle Codes (K Codes)
ss.	Vehicle	Dismount	Parcel	Drop to Customer
tt.	Vehicle	Dismount	Travel B/t	Drop to Customer

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

			Divr.	
--	--	--	-------	--

RESPONSE:

(a-tt) I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35

MPA/USPS-T13-100. Please confirm that you assigned the "Street Support" category to all tallies with:

- (a) Dock, Gas Station, In Unit Walking, PBL, or Relay Box locations.
- (b) Loading or Unloading activity, regardless of location.
- (c) Materials Handling activity detail.

RESPONSE:

In order to respond to this question Access queries were written and the data exported to Excel for evaluation. This data can be found on the attached pages.

- (a) Confirmed. After having engaged in a time-consuming review of tallies, I can state that there are 106 permutations, representing a total of 486 tallies, containing the Location - Dock. I confirm that all of these tallies were assigned to Street Support. There are 40 permutations, representing a total of 109 tallies, containing Location - Gas Station. I confirm that all of these tallies were assigned to Street Support. There were 2 permutations, representing a total of 2 tallies, with the Location entry of In Unit Walking. I confirm that all of these tallies were assigned to Street Support. There are 23 permutations, with 1717 total tallies, with Location entry PBL. I confirm that all of these tallies were assigned to Street Support. There are 20 permutations, with 117 total tallies, with Location - Relay Box. I confirm that all of these tallies were assigned to Street Support.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35**

(b) Not confirmed. There are 75 permutations, representing 1072 total tallies, containing the Activity of Loading. I confirm that all of these tallies were assigned to Street Support. There are 60 permutations, 427 total tallies, with the Activity Unloading. Two of these permutations, with one tally in each, have the Location as Collection Box, were assigned the STS category of Collection time. The remaining 73 permutations were assigned to Street Support. Due to the above-mentioned assignment of some tallies to Collection time, I can not confirm that all Loading or Unloading activity, regardless of location, was assigned to Street Support.

(c) Not confirmed. There are 5 permutations, with 8 total tallies, containing Activity Details – Mat'l Handling. Four of these permutations, with 7 total tallies, were assigned to Street Support. One permutation, with one tally, is assigned to Route Access FAT. Thus I cannot confirm that all Activity Details of Mat'l Handling were assigned Street Support.

STS Type	SiteLocationCode	Site Location	PersonalCode	Personal Admin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activity Detail	Count
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K01	LLV	70
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J09	Loading	K01	LLV	42
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K01	LLV	38
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	K01	LLV	30
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	K01	LLV	28
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	K01	LLV	19
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S02	Business Outside	J09	Loading	K01	LLV	17
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K01	LLV	16
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J09	Loading	K01	LLV	12
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J10	Unloading	K01	LLV	11
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S01	Business Inside	J09	Loading	K01	LLV	11
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K01	LLV	10
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K01	LLV	9
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	K01	LLV	8
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K01	LLV	7
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K01	LLV	6
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S01	Business Inside	J09	Loading	K01	LLV	6
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K01	LLV	6
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	T05	Walking	H00	N/A	5
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J10	Unloading	K01	LLV	5
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	T05	Walking	K10	Walk Flat	5
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	T00	N/A	H00	N/A	5
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K00	Jeep	3

Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	K01	LLV	3
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K00	Jeep	3
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J09	Loading	K00	Jeep	3
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J10	Unloading	K01	LLV	3
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	T05	Walking	K10	Walk Flat	3
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	H00	N/A	3
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	T00	N/A	H00	N/A	3
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	T05	Walking	K10	Walk Flat	2
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	T05	Walking	K10	Walk Flat	2
Street Support Time	L07	Dock	A00	N/A	WT01	Foot	S00	N/A	D08	Delay - Specify	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	T05	Walking	K10	Walk Flat	2
Street Support Time	L07	Dock	A00	N/A	WT00	N/A	S00	N/A	J09	Loading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S03	Resident Inside	J10	Unloading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J11	Setup	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	T05	Walking	K04	Walk Push Cart	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S02	Business Outside	J09	Loading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	T00	N/A	K09	Walking	2
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S02	Business Outside	T00	N/A	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J09	Loading	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J11	Setup	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K00	Jeep	2
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K00	Jeep	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K10	Walk Flat	2

Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	T00	N/A	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	T05	Walking	K04	Walk Push Cart	1
Street Support Time	L07	Dock	A00	N/A	WT01	Foot	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT01	Foot	S00	N/A	F04	DelaySpcl yDetail	G05	Excess Wrds Carr	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K09	Walking	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J11	Setup	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	T00	N/A	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K02	1 or 2 Ton Track	1
Street Support Time	L07	Dock	C02	Forms	WT04	Dismount	S00	N/A	T00	N/A	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J11	Setup	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT01	Foot	S00	N/A	T05	Walking	K10	Walk Flat	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J11	Setup	K01	LLV	1
Street Support Time	L07	Dock	C03	Superv. Instruct	WT02	Curb	S04	Resident Outside	T00	N/A	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	T05	Walking	K11	Walk Obet	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	D08	Delay - Specify	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S02	Business Outside	J10	Unloading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J06	Mix	E03	Matl Handling	1
Street Support Time	L07	Dock	A00	N/A	WT01	Foot	S04	Resident Outside	D08	Delay - Specify	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	T05	Walking	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	D08	Delay - Specify	K01	Parking Unavail	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J11	Setup	K01	LLV	1

MPA 100 A L07 Dock

Attachment to Response to USPS/MPA-T13-100

Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	T02	Travel B1 Dvr.	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	D06	No Work	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K03	Pickup / Van	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J10	Unloading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J11	Setup	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K10	Walk Flat	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	T05	Walking	K10	Walk Flat	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S01	Business Inside	T05	Walking	K10	Walk Flat	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	K10	Walk Flat	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J11	Setup	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	T05	Walking	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S01	Business Inside	T05	Walking	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S01	Business Inside	T05	Walking	K11	Walk Obst	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	T05	Walking	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J10	Unloading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J11	Setup	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S02	Business Outside	D08	Delay - Specify	K01	Parking Unavail	1

5

MPA 100 A L07 Dock

Attachment to Response to USPS/MPA-T13-100

Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	D08	Delay - Specify	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S02	Business Outside	T05	Walking	H00	N/A	1
Street Support Time	L07	Dock	C03	Superv. Instruct	WT05	Central	S00	N/A	T00	N/A	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J11	Setup	K09	Walking	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	T05	Walking	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S03	Resident Inside	J09	Loading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S01	Business Inside	J10	Unloading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S01	Business Inside	T00	N/A	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J09	Loading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T00	N/A	H00	N/A	1
													486

STS Type	Site Location Code	Site Location	Personal Code	Personal Admin	Delivery Type Code	Delivery Type	Delivery Status Code	Delivery Status	Activities Code	Activities	Activities Detail Code	Activity Detail	Count
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S00	N/A	T00	N/A	H00	N/A	35
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S00	N/A	T00	N/A	K01	LLV	9
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	T00	N/A	H00	N/A	5
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	T00	N/A	K01	LLV	4
Street Support Time	L17	Gas Station	C05	Other - Specify	WT02	Curb	S00	N/A	T00	N/A	H00	N/A	4
Street Support Time	L17	Gas Station	A00	N/A	WT05	Central	S00	N/A	T00	N/A	H00	N/A	4
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S00	N/A	T00	N/A	H00	N/A	4
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S00	N/A	T00	N/A	H00	N/A	3
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S04	Resident Outside	D08	Delay - Specify	H00	N/A	2
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	T01	Travel To 1 Dvr	K01	LLV	2
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	D08	Delay - Specify	H00	N/A	2
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S02	Business Outside	T00	N/A	H00	N/A	2
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S00	N/A	T00	N/A	K01	LLV	2
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S04	Resident Outside	T00	N/A	H00	N/A	2
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S04	Resident Outside	T00	N/A	K01	LLV	2
Street Support Time	L17	Gas Station	C05	Other - Specify	WT02	Curb	S04	Resident Outside	T00	N/A	H00	N/A	2
Street Support Time	L17	Gas Station	C05	Other - Specify	WT03	Park & Loop	S00	N/A	T00	N/A	H00	N/A	2
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	T02	Travel B/T Dvr.	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S02	Business Outside	T00	N/A	K00	Jeep	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S02	Business Outside	T00	N/A	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	D08	Delay - Specify	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S04	Resident Outside	F04	Delay Spcl yDetail	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S00	N/A	T01	Travel To 1 Dvr	K01	LLV	1

Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S00	N/A	D08	Delay - Specify	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S02	Business Outside	T00	N/A	H00	N/A	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S00	N/A	F04	DelaySpcl yDetail	H00	N/A	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S00	N/A	T00	N/A	K00	Jeep	1
Street Support Time	L17	Gas Station	A00	N/A	WT02	Curb	S00	N/A	D08	Delay - Specify	H00	N/A	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S04	Resident Outside	D08	Delay - Specify	K00	Jeep	1
Street Support Time	L17	Gas Station	C05	Other - Specify	WT03	Park & Loop	S04	Resident Outside	T00	N/A	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F04	DelaySpcl yDetail	H00	N/A	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T00	N/A	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S04	Resident Outside	T04	Return to Unit	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S00	N/A	T00	N/A	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT04	Dismount	S01	Business Inside	T00	N/A	H00	N/A	1
Street Support Time	L17	Gas Station	A00	N/A	WT05	Central	S00	N/A	T00	N/A	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT05	Central	S03	Resident Inside	T01	Travel To 1 Dhr	K01	LLV	1
Street Support Time	L17	Gas Station	A00	N/A	WT05	Central	S04	Resident Outside	T00	N/A	K01	LLV	1
Street Support Time	L17	Gas Station	C05	Other - Specify	WT03	Park & Loop	S04	Resident Outside	T00	N/A	H00	N/A	1
Street Support Time	L17	Gas Station	A00	N/A	WT03	Park & Loop	S04	Resident Outside	D08	Delay - Specify	H00	N/A	1

MPA 100 A L18 In Unit Walk

Attachment to Response to USPS/MPA-T13-100

STS Type	SiteLocationCode	Site_Location	PersonalCode	PersonalAdmin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activity Detail	Count
Street Support Time	L18	In Unit walking	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K01	L1V	1
Street Support Time	L18	In Unit walking	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	H00	N/A	1

STS Type	SiteLocation	Site_Location	PersonalCode	Personal_Admin	DeliveryTypeCode	Delivery_Type	DeliveryStatusCode	Delivery_Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activity_Detail	Count
Street Support Time	L14	PBL	A02	Sbj Break	WT02	Curb	S00	N/A	T00	N/A	H00	N/A	598
Street Support Time	L14	PBL	A02	Sbj Break	WT03	Park & Loop	S00	N/A	T00	N/A	H00	N/A	276
Street Support Time	L14	PBL	A02	Sbj Break	WT04	Dismount	S00	N/A	T00	N/A	H00	N/A	233
Street Support Time	L14	PBL	A02	Sbj Break	WT05	Central	S00	N/A	T00	N/A	H00	N/A	180
Street Support Time	L14	PBL	A01	Sbj Personal	WT02	Curb	S00	N/A	T00	N/A	H00	N/A	135
Street Support Time	L14	PBL	A01	Sbj Personal	WT04	Dismount	S00	N/A	T00	N/A	H00	N/A	88
Street Support Time	L14	PBL	A01	Sbj Personal	WT03	Park & Loop	S00	N/A	T00	N/A	H00	N/A	87
Street Support Time	L14	PBL	A01	Sbj Personal	WT05	Central	S00	N/A	T00	N/A	H00	N/A	59
Street Support Time	L14	PBL	A02	Sbj Break	WT01	Foot	S00	N/A	T00	N/A	H00	N/A	32
Street Support Time	L14	PBL	A01	Sbj Personal	WT01	Foot	S00	N/A	T00	N/A	H00	N/A	7
Street Support Time	L14	PBL	A02	Sbj Break	WT00	N/A	S00	N/A	T00	N/A	H00	N/A	6
Street Support Time	L14	PBL	A02	Sbj Break	WT02	Curb	S04	Resident Outside	T00	N/A	H00	N/A	3
Street Support Time	L14	PBL	A01	Sbj Personal	WT00	N/A	S00	N/A	T00	N/A	H00	N/A	2
Street Support Time	L14	PBL	A01	Sbj Personal	WT04	Dismount	S04	Resident Outside	T00	N/A	H00	N/A	2
Street Support Time	L14	PBL	A01	Sbj Personal	WT02	Curb	S00	N/A	D08	Delay - Specify	H00	N/A	1
Street Support Time	L14	PBL	A01	Sbj Personal	WT02	Curb	S02	Business Outside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A01	Sbj Personal	WT02	Curb	S04	Resident Outside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A01	Sbj Personal	WT03	Park & Loop	S01	Business Inside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A01	Sbj Personal	WT05	Central	S03	Resident Inside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A02	Sbj Break	WT03	Park & Loop	S04	Resident Outside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A02	Sbj Break	WT04	Dismount	S01	Business Inside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A02	Sbj Break	WT04	Dismount	S04	Resident Outside	T00	N/A	H00	N/A	1
Street Support Time	L14	PBL	A01	Sbj Personal	WT05	Central	S01	Business Inside	T00	N/A	H00	N/A	1

STS Type	SiteLocationCode	Site_Location	PersonalCode	Personal Admin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activity Detail	Count
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Coll.	H00	N/A	26
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J11	Setup	H00	N/A	20
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J09	Loading	H00	N/A	15
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S00	N/A	J08	Del/Coll.	H00	N/A	11
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	D08	Delay - Specify	H00	N/A	10
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S00	N/A	D08	Delay - Specify	H00	N/A	7
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S01	Business Inside	J11	Setup	H00	N/A	6
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S02	Business Outside	J09	Loading	H00	N/A	4
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J11	Setup	H15	Col'n Box	3
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J10	Unloading	H00	N/A	3
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J08	Del/Coll.	H15	Col'n Box	2
Street Support Time	L11	Relay Box	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J08	Del/Coll.	H00	N/A	2
Street Support Time	L11	Relay Box	A00	N/A	WT04	Dismount	S01	Business Inside	J08	Del/Coll.	H15	Col'n Box	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	T00	N/A	H00	N/A	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	T02	Travel B/T Dvr.	H00	N/A	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S02	Business Outside	J08	Del/Coll.	H00	N/A	1
Street Support Time	L11	Relay Box	A00	N/A	WT03	Park & Loop	S00	N/A	T01	Travel To 1 Dvr	K01	LLV	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S00	N/A	T00	N/A	H00	N/A	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	D10	Wait 4 Collectn	H00	N/A	1

1

MPA 100 B Loading

Attachment to Response to USPS/MPA-T13-100

STS Type	SiteLocationCode	Site_Location	PersonalCode	PersonalAdmin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activity Detail	Count
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K01	LLV	228
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	J09	Loading	K01	LLV	99
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	K01	LLV	80
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K01	LLV	70
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K01	LLV	62
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K01	LLV	55
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K01	LLV	51
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J09	Loading	K01	LLV	42
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	K01	LLV	32
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	K01	LLV	30
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business Inside	J09	Loading	K01	LLV	28
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	K01	LLV	23
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S02	Business Outside	J09	Loading	K01	LLV	22
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	K01	LLV	19
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S02	Business Outside	J09	Loading	K01	LLV	17
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K01	LLV	16
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S01	Business Inside	J09	Loading	K01	LLV	15
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J09	Loading	H00	N/A	15
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J09	Loading	K01	LLV	12
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K00	Jeep	11
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S01	Business Inside	J09	Loading	K01	LLV	11
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K01	LLV	10
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	K00	Jeep	8

Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	K03	Pickup / Van	8
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K01	LLV	7
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	J09	Loading	K00	Jeep	6
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S01	Business Inside	J09	Loading	K01	LLV	6
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K00	Jeep	5
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S02	Business Outside	J09	Loading	H00	N/A	4
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K00	Jeep	4
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S02	Business Outside	J09	Loading	K01	LLV	4
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	H00	N/A	4
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S03	Resident Inside	J09	Loading	K01	LLV	3
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S02	Business Outside	J09	Loading	K01	LLV	3
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J09	Loading	K00	Jeep	3
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	K01	LLV	3
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K00	Jeep	3
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	H00	N/A	3
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business Inside	J09	Loading	K00	Jeep	3
Street Support Time	L08	Vehicle	A00	N/A	WT01	Foot	S01	Business Inside	J09	Loading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J09	Loading	H00	N/A	2
Street Support Time	L15	Misc	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S02	Business Outside	J09	Loading	K01	LLV	2
Street Support Time	L08	Vehicle	A00	N/A	WT00	N/A	S00	N/A	J09	Loading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K00	Jeep	2
Street Support Time	L07	Dock	A00	N/A	WT00	N/A	S00	N/A	J09	Loading	K01	LLV	2
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S02	Business Outside	J09	Loading	K03	Pickup / Van	2

Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K02	1 or 2 Ton Track	2
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	K00	Jeep	2
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S02	Business Outside	J09	Loading	K00	Jeep	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K02	1 or 2 Ton Track	1
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L15	Misc	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K02	1 or 2 Ton Track	1
Street Support Time	L09	Park Point	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	K01	LLV	1
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S02	Business Outside	J09	Loading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J09	Loading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	H00	N/A	1
Street Support Time	L18	In Unit walking	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	H00	N/A	1
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S01	Business Inside	J09	Loading	K01	LLV	1
Street Support Time	L08	Vehicle	A00	N/A	WT01	Foot	S04	Resident Outside	J09	Loading	H00	N/A	1
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K03	Pickup / Van	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J09	Loading	K03	Pickup / Van	1
Street Support Time	L18	In Unit walking	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J09	Loading	K00	Jeep	1
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	K00	Jeep	1
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	J09	Loading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S03	Resident Inside	J09	Loading	K01	LLV	1

Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business Inside	J09	Loading	K03	Pickup / Van	1
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S00	N/A	J09	Loading	H00	N/A	1
Street Support Time	L09	Park Point	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J09	Loading	K01	LLV	1

STS Type	SiteLocationCode	Site_Location	PersonalCode	PersonalAdmin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	Activities Detail	Count
Collection Box	L10	Collection Box	A00	N/A	WT01	Foot	S04	Resident Outside	J10	Unloading	H15	Colt Box	1
Collection Box	L10	Collection Box	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	H15	Colt Box	1
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K01	LLV	71
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	K01	LLV	52
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K01	LLV	38
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	K01	LLV	28
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	J10	Unloading	K01	LLV	25
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	K01	LLV	22
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K01	LLV	22
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K01	LLV	21
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K01	LLV	16
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside	J10	Unloading	K01	LLV	13
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J10	Unloading	K01	LLV	11
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K01	LLV	9
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	K01	LLV	8
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J10	Unloading	K01	LLV	8
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K01	LLV	8
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K01	LLV	8
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K00	Jeep	6
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S03	Resident Inside	J10	Unloading	K01	LLV	4
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J10	Unloading	K01	LLV	3
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S04	Resident Outside	J10	Unloading	H00	N/A	3
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K03	Pickup / Van	3
Street Support Time	L08	Vehicle	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K00	Jeep	3

Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K00	Jeep	3
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K00	Jeep	3
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K10	Walk Flat	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K00	Jeep	2
Street Support Time	L15	Misc	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	H00	N/A	2
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K00	Jeep	2
Street Support Time	L15	Misc	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K01	LLV	2
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S03	Resident Inside	J10	Unloading	K01	LLV	2
Street Support Time	L15	Misc	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	H00	N/A	2
Street Support Time	L15	Misc	A00	N/A	WT02	Curb	S00	N/A	J10	Unloading	K01	LLV	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	H00	N/A	2
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S04	Resident Outside	J10	Unloading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S03	Resident Inside	J10	Unloading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K09	Walking	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT01	Foot	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S02	Business Outside	J10	Unloading	K01	LLV	1
Street Support Time	L00	N/A	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	K01	LLV	1
Street Support Time	L15	Misc	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K01	LLV	1
Street Support Time	L11	Relay Box	A00	N/A	WT01	Foot	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L09	Park Point	A00	N/A	WT03	Park & Loop	S00	N/A	J10	Unloading	K01	LLV	1
Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	J10	Unloading	K00	Jeep	1

Street Support Time	L08	Vehicle	A00	N/A	WT05	Central	S02	Business Outside	J10	Unloading	K01	LLV	1
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside	J10	Unloading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	K10	Walk Flat	1
Street Support Time	L08	Vehicle	A00	N/A	WT00	N/A	S00	N/A	J10	Unloading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J10	Unloading	K10	Walk Flat	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S04	Resident Outside	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT05	Central	S00	N/A	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S04	Resident Outside	J10	Unloading	K00	Jeep	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S02	Business Outside	J10	Unloading	H00	N/A	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S01	Business Inside	J10	Unloading	K01	LLV	1
Street Support Time	L07	Dock	A00	N/A	WT04	Dismount	S00	N/A	J10	Unloading	K00	Jeep	1
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business Inside	J10	Unloading	K01	LLV	1

STS Type	SiteLocationCode	Site_Location	PersonalCode	Personal Admin	DeliveryTypeCode	Delivery Type	DeliveryStatusCode	Delivery Status	ActivitiesCode	Activities	ActivitiesDetailCode	ActivityDetail	Count
Route/Access (FAT) Street	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	T00	N/A	E03	Mail Handling	1
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J04	Parcels	E03	Mail Handling	3
Street Support Time	L08	Vehicle	A00	N/A	WT04	Dismount	S00	N/A	J06	Mix	E03	Mail Handling	2
Street Support Time	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	J06	Mix	E03	Mail Handling	1
Street Support Time	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	J06	Mix	E03	Mail Handling	1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-101. Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the "Street Support" category.

Location	Activity	Activity Detail
Misc, Park Point or Vehicle	Loading	Vehicle Codes (K Codes)
Misc	Setup	Walking Push Cart
On Route	Setup	Walking
Park Point, Vehicle	Setup	N/A
Park Point, Vehicle	Unloading	Vehicle Codes (K Codes)
Vehicle	Loading	N/A
Vehicle	Travel B/t Divr.	Walk Flat
Vehicle	Travel B/t Divr.	Vehicle Codes (K Codes)

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-102. Should the out-of-office time for each route-day, particularly those for motorized carriers, begin with some sort of Street Support (i.e., "Loading/Setup" or Travel to First Delivery activity) and end with some sort of Street Support (i.e., "Return to Unit" or "Unloading" activity) time? Please explain. If a route-day does not begin or end in this manner, what does it indicate?

RESPONSE:

In the typical carrier's typical day, I agree that carriers perform loading and setting up, travel to first delivery, return to unit and unloading. The work sampling process, where the scan is taken every six minutes, may not capture, on a specific day, these particular activities.

**REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-103. Should the out-of-office time for each route-day contain some Personal or Administrative (PBL) time? Please explain. If a route-day does not include any PBL time, what does it indicate?

RESPONSE:

Not necessarily. The carrier may take PBL time in the office, before going to the street, or after returning from the street. PBL time may also be taken sporadically throughout the street time, but not have been identified at the moments the work samplings were taken. On occasion, there may be carriers that did not take any personal time or break time.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-104. For out-of-office time, if there is no lengthy break in the tally times (one every six minutes or so) for lunch breaks, what does that indicate? Please explain.

RESPONSE:

Lunch break tallies were deleted from the database provided to witness Baron, these tallies did not fall into the STS categories described in Appendix F.

**REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-105. For the "Dock" location, there are "set up" activities. Appendix D describes "setup" as "relocating mail form (sic) rear of vehicle to front, loading satchel."

(a) Please explain what the data collectors were observing when they indicated "setup" on the Dock.

(b) Please explain how "setup" differs from "loading" on the Dock.

RESPONSE:

(a) The carriers after loading the trays or tubs to the rear of the vehicle would then load the satchel while still at the dock.

(b) Setup is loading the satchel or moving trays to the front of the vehicle. Loading is moving trays from a hamper or nutting truck to the rear of the vehicle.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-106. There (sic) Park Point location tallies which indicate central, curblin, or dismount delivery types. Per Appendix D, you state that the "Park Point" location applies to park and loop "routes". Please clarify, what were the data collectors indicating when they assigned the "Park Point" location?

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

**REPOSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-107. There is a "Relay Box" location tally that has a "Wait 4 Collection" activity. Please explain what specific activity the data collectors were observing when they took this tally.

RESPONSE:

I have identified one such tally. This tally involves a foot route. It is possible that the carrier arrived at the relay box before the mail arrived for him to deliver his next loop.

**REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.**

MPA/USPS-T13-108. There are a lot of vehicle location tallies for dismount deliveries with "setup" activity. Per Appendix D, you state that setup is "relocating mail form [sic] rear of vehicle to front, loading satchel." But, Appendix D also states that Dismount is serving one or more customers by dismounting and without use of a satchel. Please explain what specific activity the data collectors were observing when they took these tallies.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

REPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
THE THIRD SET OF INTERROGRATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC.

MPA/USPS-T13-109. For the "In Unit Walking" locations, the activity is "loading" which is described in Appendix D as "putting mail into vehicle". Please explain what specific activity the data collectors were observing when they took these tallies.

RESPONSE:

I have identified two tallies involving "In Unit Walking" where the activity is "loading." The data collectors were probably observing a carrier inside the unit, either on his way out to load a vehicle, or on his way back in to get more mail to load the vehicle.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

NAA/USPS-T13-1: Please refer to page 28 of your testimony. Under Level 11.4 Activity, there appears the designation "JO6 Mix - Letters, Flats, ADVOs - packet". With respect to this designation, please state:

- a. Is there any other instance in your survey in which mail pieces are identified by the name of a particular mailer, such as Advo? If so, please identify those instances.
- b. Was the selection of "Advo" as a designation pursuant to a suggestion or directive from anyone in the Postal Service?
- c. What does the designation "Advo" mean in this context?

RESPONSE:

- a. Yes, ADVO was used in the data collection for level 13 code R41 Study Quantities and again in level 11.4 code J14 in the Inside Office work sampling. ADVO in these instances is used in a generic context to identify DALs (Detached Address Labels) that are cased, for which a corresponding flat will be delivered.
- b. The Postal Service did not direct the selection of ADVO.
- c. For all intents and purposes ADVO = DAL. There are other providers of DALs besides Advo, Inc., such as PennySaver.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

NAA/USPS-T13-2. Please describe how observations of carriers handling detached address labels were recorded.

RESPONSE:

In the Outside work sampling and time studies, there was no tracking of detached address labels. During Inside work sampling, if a carrier was working with DALs, the observer would have scanned J14 ADVO. Also, if DALs were carried on a study day, the observer was to record the quantity of DALs carried using the R41 code.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

NAA/USPS-T13-3. Did you consider alternative means of conducting the Engineered Standards/Delivery Redesign project? If so, please explain why you chose to conduct the project in the way that you did, rather in an alternative manner.

RESPONSE:

Yes, I considered alternative means of conducting the study. After reading an arbitration decision provided to me by the Postal Service, meeting various USPS personnel, visiting two post offices, and seeing the variability of the mail mix, considering the effect of work environment, and facing developing a system that could apply to approximately 243,000 carriers and affect over 30,000 potential locations, possibly replacing negotiated standards that had been in place since the 1920s, I believed that it would be beneficial to create extensive documentation and collect numerous data to support the difficult decisions to be faced by USPS Management, Unions and various others. Therefore, I designed a very comprehensive program, with more than one means of recording information relevant to city carrier operations.

Direct observation of the carriers was necessary in order to obtain information to support the development of engineered work methods, time standards, and to prepare for possible arbitration.

The work sampling data identified where the carriers were spending their time, so that we could prioritize the parts of the carrier's work day that might yield the biggest productivity gains if improvements were made to work methods.

Work sampling also provided measurements of the percentage of the

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAAUSPS-T-13-1-7**

carrier's workday in which delays were experienced. This percentage of delay is and important component in developing time standards.

The time study data identified the rates at which carriers were performing various tasks. This time study data was used to develop various components of the engineered standards.

We also used videotapes to create a visual history of what was being observed, to assist in the methods work, serve as a frame by frame time study tool for validating the predetermined time measurement system. The videos were also used to create the time standards and evaluate various methods. The videos provided a method to obtain actual work rate data for comparison to the predetermined time measurement system.

We also recorded quantitative data such as temperature, humidity, age, gender, weight, smoking or non-smoker, etc. These data were used to help us to determine if these factors had an effect on the work being performed, and control for them.

We had specific reasons for proceeding as we did with collecting the data. We determined that the best means to collect data would be one that was easy for the data collector to learn. In this way, the data collectors could stay focused on the activities they were observing, rather than on how to record them. The pool of data collectors was selected from a non-Postal environment so as to minimize the potential role of preconceptions. It was our goal for the observers to simply record what was happening, not what "should" happen. We wanted to

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAAUSPS-T-13-1-7**

avoid any preconceived notions as to what is slow or fast, we wanted the observers to not assume but to ask why. We wanted to present every opportunity for possible methods improvements, and not to accept any practice as "that is the way it has always been done." The bar code approach that we used allowed the observers to stay focused on their subjects. The technique allows for ease, speed, consistency, and accuracy in collecting data.

The use of the bar code approach had additional advantages. It eliminated the need for data collectors to be skilled in the use of a stopwatch to be able to take time studies. The data collected does not require manual calculations for determining the length of a time study, because the calculations were performed by the software. The bar code approach allowed time-of-day analysis to determine if the rate of work was slowing down or speeding up as the day progressed. The use of bar coding greatly reduces manual entries and keying-in data that is associated with other possible data collection approaches. Scanning for the most part eliminated writing down information during the collection process. The wands were programmed to admit a beep to signal when the work sampling was to take place. The wands were programmed in a defined hierarchy that prompted the user in what to do next. The scanned data turned into information almost instantaneously via the software application. This ability allowed edits to take place while the day's events were still fresh in the observer's mind. Nightly, the data was rolled into a composite database so analysis could be ongoing and information made available throughout the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7

collection process which enabled multiple phases/tasks of the project to be taking place concurrently.

Other methods were looked at to determine if they would be appropriate for collecting data. An electronic board that was developed for collecting data on oil rigs at sea was reviewed. This device could perform both time study and work sampling. It was heavy, required special software, and you had to know the codes for input. We considered the use of another Data Collection Device (DCD), but this unit required two hands to operate. You could input codes directly, but this meant you needed to remember all the codes. This unit also required the sequencing/scanning via a LCD screen through codes to get to the function you needed to perform, and the software is proprietary. Small notebook computers with touch screens were looked at, but they were heavy, required two hands, were slow, and were difficult to see in the field. The TimeWand II is light and easy to slip into a pocket while performing other tasks, teams could carry more than one scanner with them in case of a scanner problem, they are very fast and speed up data collection, they are both visual and audible, have a high level of reliability, are easy to learn how to use for either right or left handed people, and are flexible in terms of modifying the applications software.

I also considered having carriers self-report: via use of paging, through the use of cell telephones, by giving them a TimeWand II scanner, and by having them fill out forms. All these approaches were considered to increase the volume

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

of data. None of these techniques were used because they would not supply the total set of data/documentation of a carrier's day that we wished to collect.

The technology used, the TimeWand II along with Sony High 8mm video, combined with the process used, should be considered state-of-the-art. The use of bar code technology allowed multiple time studies to be made at the same time, and at the same time collect work sampling and quantitative data, and still allow the data collection team time to make the videotape records. The use of the technology allowed for studies/processes that are normally performed independently to be performed concurrently and with a great deal of ease and simplicity. The bar code approach also produced data that identified the time-of-day of the data collection, which also greatly increased our knowledge of carriers' work patterns. The collection of the quantitative data, such as temperature, humidity, gender, age, height, weight, smoker, non-smoker, rain, snow, wind, distances in paces to various locations, satchel weight, doors, gates, bends, was also important. This quantitative data regarding factors that may be affecting the other data being collected is usually not collected due to the difficulties in recording the information, entering it into a database, and linking it to the other data. This quantitative data has allowed for a view of the effects of age, gender, smoking, etc. that will assist in defending the fairness and equity of the engineered standards with respect to different demographic groups. The videos' frame by frame analysis has provided invaluable data to support the validation of

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

the predetermined time system, assisting with method recommendations, and in some cases answering work sampling questions.

I felt that it was necessary to have the video, work sampling, time study, and quantitative data all being collected simultaneously, or overlapping and/or at different times during a carrier's day to make sure I had a comprehensive set of data. By using multiple approaches, I could use each approach's data to assist in supporting the other approach. By conducting the data gathering the way I did, I documented a day in the life of a city carrier thoroughly enough to support engineered methods and engineered standards development, an application system, and a possible future arbitration.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

NAA/USPS-T13-4. Please refer to your testimony at page 1, lines 6-8 where you state that you have "extensive experience applying work-measurement systems, developing time-based planning and scheduling systems, providing data for project/product costing, and making recommendations for methods improvements."

- a. Please provide further description of this experience that is not related to the United States Postal Service.**
- b. Please provide further description of this experience that is related to the United States Postal Service.**
- c. Please identify similarities between the experiences described in (a) and (b) and the ES study.**

RESPONSE:

a. As an apprentice to become a Machinist at Fellows Gear Shaper in Springfield, Vermont, I not only had to learn the right way of operating the various machines and designing tooling, fixtures, and machines, but I was constantly under pressure from superiors and peers to find improved methods and improve quality with lower cost. During my college years, I had the good fortune of working my college breaks at Fellows where I had completed my apprenticeship and the pressure was even greater to apply my college education to improving methods, quality, and reducing cost.

My first career opportunity after college placed me at Fafnir Bearing Inc. New Britain, Connecticut and in a position to rejuvenate a failed Maintenance Work Force Management program and Office Management program. The engineered standards supporting these programs had not been accepted by the union. This opportunity required me to learn a predetermined time system, and various forms of standard data developed by H.B. Maynard and Company, Inc.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

These standards had to be updated to reflect method changes. The objectives of these programs were to estimate workload based on engineered methods and standards. The workload was then used for scheduling, costing projects, determining staffing levels, and allocating costs to various manufacturing centers, and equipment justification analysis. I developed a computerized approach for the Maintenance Work Force Management before such approaches were common, and managed to have the union buy into the programs as tools to assist managing over previously used arbitrary processes. I became supervisor of the Industrial Engineering section called Indirect Labor and Methods, and, as time went on, the Plant Layout group and Office Services department. Office Services included the typing and filing pool, the Mailroom, and communications. As the supervisor, I did all capital equipment and facilities justifications, administered the company suggestion program and methods improvement program, and supervised industrial engineers in the development of methods and engineered standards for multiple plants with over 3000 employees. I also was the caretaker of the job classification system. Data from the standards programs was an integral part of the company's standard costing system.

My second career opportunity placed me as the Chief Industrial Engineer of Chase Brass and Copper located in Euclid, Ohio where I was responsible for the incentive system, maintenance bonus system, job classification program, and methods improvements. Circumstances led to federal meditation to modify the job classifications and adjust the incentive program.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7

My third career move was to join H.B. Maynard and Company, Inc.

(HBMCo) an industrial engineering based management consulting firm based in Pittsburgh, Pennsylvania. HBMCo is a world renowned firm that is credited with developing a number of predetermined work measurement techniques, editing editions of the Industrial Engineering Handbooks, training clients in method improvements, work measurement, and in the application of an expert system for standards applications. As a Senior Consultant, Consultant Manager, Manager, and Principal in the firm, my role was to train, provide on-site guidance, and develop application systems for clients. In my early days, I trained clients in MTM (Methods Time Measurement), Universal Standards Data, Maintenance Standard Data, the development of benchmarks, the technique of using benchmarks to estimate work orders, planning and scheduling, and cost estimating. As time went on, MOST® (Maynard Operation Sequence Technique) in various forms replaced MTM. The use of computers allowed for developing better-balanced benchmarks and for taking into account multiple resources. This approach allowed me to move clients towards better methods analysis, resource costing, scheduling, and planning. Most of my career with HBMCo was spent working with clients applying various techniques to very difficult work measurement environments in Electric and Gas Utility companies, a few manufacturing companies, and various special assignments not related to work measurement.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAAUSPS-T-13-1-7**

These assignments typically had from 6 to 30 client personnel, on occasion another HBMCo consultant would be assigned to assist. The areas covered included electric and gas construction and maintenance of distribution including right of way clearing, electric transmission construction and maintenance including right of way, various shops such as: breaker, switch, and transformer maintenance, vehicle modification and maintenance, meter repair and calibration. Tree trimming, trouble shooting systems, and communications installation and maintenance were also areas covered. Estimating, planning, scheduling systems, and computerized management information systems were either developed or integrated with existing systems.

In addition to my normal consulting duties, I also developed an interactive seminar process to get all organizational levels to participate in improving methods, understanding the difference between Planning and Scheduling, Estimating, Quality, and Effecting the Change Process. This interactive seminar process was applied to both utilities and manufacturing organizations.

b. A large telecommunications company, BellSouth, wanted to baseline different crafts involved in installation and maintenance activities. They wanted a sound sample that would represent their operation across nine states and a craft work force in excess of twenty thousand people. The baseline process needed to identify areas for method improvements and determine the length of time for various tasks. Combinations of work sampling and time studies were used along

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

with Access® to accomplish the project. Around 26 non- BellSouth observers were trained and used to collect the sample. A manual/digital timer was used along with manual forms, keying in the data, and a process for quality checking both the raw data and the keyed data was put in place. Twelve people were used to key-in the data. The resulting picture of the day in the life of a field technician was very well received.

The next step was to study their operating centers and supply time study data to assist them in pursuit of the Demming award and as operational information for organizational changes. The operations being studied were documented on process flow charts and data collection needed to follow these diagrams. Part of the studies needed to take place in very low light conditions where reading a stopwatch and filling out manual forms would be difficult. I introduced the use of the TimeWand II to collect the data. The approach was so successful the client had their personnel trained in using the bar code methodology for additional studies.

Next was a call back to baseline a subset of a craft we had studied on the first project. The objective was the collection of data for evaluation of a possible investment of millions in new technology as a methods improvement business case. They needed new data, and the new data needed to be compared to our first data set along with the data collected during the use of a prototype. Bar code scanning was expanded to replicate the initial study's manual approach. The data was collected and information supplied for the business case.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

c. My next assignment was to develop the Engineered Methods and Standards for the United States Postal Service city letter carriers. After my initial exposure to the USPS, my experiences identified this as a formidable task.

- 1. There was room for methods improvements. All through my career, I have been placed in environments that felt they had evolved to the best level and yet there always has been room for improvement. The study needed to document what was in place and provide the opportunity for creative thinking to identify improvements. The processes used would have to allow for evaluating various methods without field trials.**
- 2. Based on the prior arbitration case I felt the USPS had four choices for establishing standards:**
 - A. Develop standards based on only work sampling data,**
 - B. Develop standards based on time studies,**
 - C. Negotiate new standards without developing standards from analyses,**
 - D. Use a predetermined time measurement system that is methods sensitive, but validate the measurement system for application in the USPS environment.**

I was used to using all of these approaches. I have trained clients and contractors in their use, and have developed approaches/techniques to collect the data. The size of the client's territory and number of people performing the work was 6 to 10 times the size of the telecommunications

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

client. The tasks the carriers were performing were far simpler than most of the complex tasks I had to evaluate in my past. The size would be an advantage in terms of where to look. My experience with sampling populations is that when the population gets very large, no matter what criteria the company uses to pick a sample, the results are very close to a random sample. In this assignment, I would use both company picked and random approaches.

3. The project needed to be phased so both the client and the teams assembled to perform the tasks could learn as time moved on. My concern was that the potential improvement opportunity would benefit from data and documentation beyond normal standards in order to support the decision makers. Confidence in the process to collect data would be necessary from the get-go, and data turned into information quickly to avoid surprises. The teams would be better off comprised of knowledgeable non-postal people in order to record what is/was and not what may look good, and to freshly evaluate all aspects of the city carrier operation. People from a wide variety of occupations, with diverse experience levels, and different educational backgrounds using technology-supported processes would contribute the most. They had nothing to lose or gain from collecting the facts, evaluating the facts, and challenging the current processes. The most difficult teams in my past had been the know-it-all experts that supported the current conditions. It would be far easier to train people in using the bar code

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7

technology to perform time studies and work sampling than un-train experts and get them to adapt to this new approach. I judged that a hands-on approach with On-Job-Training through in-the-field involvement were keys to success. The data that needed to be collected was not complex, but the project would require lots of data/information in short periods of time. My apprenticeship and seminar development experiences were very important. I have spent hours studying, and reading definitions, but having an experienced person show me how, and then provide on the job coaching/guidance, has been the quickest route to doing things right. Based on my years of experience I made the decision that the way to document, "What happens in the day of a life of a carrier" would be best accomplished by on the job training. What is transpiring during a carrier's day is very clear when you are there seeing it happen. Learning how to tie your shoes by being shown/guided is far easy than by reading directions.

4. My experience developing benchmarks manually and with the use of computers for total resource identification, tracking and balancing had helped me develop skills in identifying the fixed and variable components of a task. In order to measure work and have a proper workload application system there needs to be a set of constants, proper identification of the variables, and a way of determining and/or inputting frequencies of the variables into necessary software applications. Simply stated Standard Time = The Sum of Constants +(Sum of (Variables x Frequencies)). This would require

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

information from work sampling data, time study data, knowledge gained from the application of the predetermined time system, and knowledge acquired from researching Postal Service computer systems. Developing new application systems and integration with existing systems has been a common practice throughout my career.

5. Overcoming potential resistance from the unions and management would be facilitated by the collecting of extensive data and documentation. There had been no change in the basic standards since the 1920's and there had been a failed attempt in to develop new standards in 1978. I anticipated concerns about: adequacy of sample size, the need for age-based exemptions from standards, potential gender-based performance distinctions, whether new methods and standards would result in too much work for the carriers, fatigue resulting from physical effort to meet standards, whether requiring supervisors to use a computer-based workload management system would result in additional workload for the supervisors, and other issues. I intended to be prepared for every "what if and no way" I had ever heard plus some I hadn't heard to be thrown my way.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAAUSPS-T-13-1-7**

NAAUSPS-T13-5. Please refer to your testimony at pages 1-3 regarding the project design.

- a. Please confirm that you were principally responsible for the design of the project that collected the ES data contained in LR-I-163.**
- b. Please describe the tally sampling approach that you employed. What other data collection, measurement, or sampling processes could have been utilized to develop engineered methods and time standards for city letter carriers?**
- c. Given that alternative methods identified in (b), on what basis did you select the tally sampling approach?**
- d. Have you developed other projects that required the collection of data over a 16-month period?**
- e. Please identify your knowledge of any similarities between the ES study and the route measurement systems or engineering time studies of other postal administrations or courier companies used to design and attribute their delivery costs, as suggested by the A. T. Kearney Data Quality Study (April 16, 1999).**
- f. Please provide your assessment of the appropriateness of the use of the ES data in the current R2000-1 docket, given the Data Quality Study's suggestions that such a project is a "potential alternative source of data" and "will take several years to fully develop," including any and all quality and validation steps you or others performed to merit its use.**
- g. Please confirm that the quality assurance checks described at page 13 of your testimony were typical of projects of this type and magnitude.**

RESPONSE:

- a. Confirmed. I was the one principally responsible for the design of the project.**

However, William M. Lloyd should share a great deal of credit for the execution.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

- b. The tally sampling approach used was fixed interval work sampling. In this case, every six minutes the observer was to identify what the carrier/subject was doing according to a defined hierarchy of bar codes. The observer was to use the TimeWand II to scan in the appropriate bar codes from the five levels in the hierarchy. The classic approach to work sampling is to have a predefined set of tasks in a table format and at random times place a tally mark next to the task to identify what subject was doing. The process for picking the random times varies.

I believe I have answered the second part of this question in my response to NAA/USPS-T-13-3.

- c. I believe I have answered this question in my response to NAA/USPS-T-13-3.
- d. Yes. I spent approximately eight calendar years assisting one utility client in the development of various standards-based programs. During one project this client we had over 40 workers involved with methods-standards development for approximately two years.
- e. I have no knowledge of the A. T. Kearney Data Quality Study. I have very limited knowledge of the Canadian postal approach and no knowledge of

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

route measurement systems or engineering time studies of other postal administrations or courier companies.

- f. I believe that the ES data provided to support the current R2000-1 docket is representative of current city carrier operations. The extensive, multifaceted data collection and analysis went far beyond the effort normally associated with ensuring a valid set of data designed to support work standards. Having never seen the Data Quality Study, I do not feel qualified to comment on the quotes you have included.
- g. I believe we instituted an above-average quality control process for this type and magnitude of project. The reports generated from each day's worth of data collection, that is the work sampling, time study, quantitative data and other reports used by the team of observers and others to Quality Check the data/work went far beyond normal data verification. The involvement of Postal Service staff and contractors to quality check the process and/or data, and reviews of the data while being collected and after the fact went beyond normal processes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

NAA/USPS-T13-6. Please refer to your testimony at pages 7-9 regarding the site selection.

- a. Please provide your assessment of the reasonableness of the site selection method and how representative were the sites and routes selected and studied.**
- b. What, if any, were the limitations of the site selection method?**
- c. Were other site selection methods considered, and, if so, why was this particular one utilized?**
- d. In selecting sites, what were the engineering objectives and accompanying statistical requirements? Please explain whether these objectives were accomplished, and provide the basis for your assessment.**

RESPONSE:

- a. I believe the process used for site and route selection produced a representative set of sites and routes and was a reasonable method to use.**
- b. Please see the response to ADVO/USPS-T13-23.**
- c. There were the three options considered for site selection: 1. pick all sites at random, 2. have all sites picked by the Areas, or 3. have the Areas pick some sites and also have some random sites. Option 3 was selected. This approach to site selection would open up the communication channels with the Areas and their respective organizations. The approach selected meant that Areas and their organizations would be able to assist with ensuring the studies could be made under normal operating conditions. Furthermore, by also having some sites picked at random, we could compare the two pools to**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

ensure that the selection technique did not affect the representativeness of
the data.

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

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGRATORIES
NAA/USPS-T-13-1-7**

NAA/USPS-T13-7. Please refer to your response to ADVO/USPS-T13-17 and Witness Baron's response to MPA/USPS-T12-26 (LR-I-219).

- a. Please confirm that the table in response to ADVO reports 0 Residential Central possible deliveries and 195, 33, 142, and 153 Residential NDCBU possible deliveries for route numbers 1579, 1581, 1595, and 4104 (rows 3-6 in the table).
- b. Please confirm that the spreadsheet in response to MPA reports 0 Residential NDCBU possible deliveries and 195, 33, 142, and 153 Residential Centralized possible deliveries for route numbers 1579, 1581, 1595, and 4104 (rows 5-8 in the spreadsheet).
- c. Please explain this discrepancy, and resolve all column headings that were apparently transposed. If you cannot, please refer this interrogatory to Witness Baron or others with the ability to provide such explanation.

RESPONSE:

- a. I confirm the table values of 0 Central, 195, 33, 142, and 153 for Residential NDCBU for routes 1579, 1581, 1595, and 4104 in my response to ADVO/USPS-T13-17.
- b. I confirm witness Baron's spreadsheet.
- c. In the response to ADVO/USPS-T13-17, the column headings in the ADVO table for NDCBU and Central were inadvertently transposed. The Table column headings should read in this order: Residential Other, Residential Curb, Residential NDCBU, Residential Central, Business Other, Business Curb, Business NDCBU, Business Curb.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

OCAUSPS-T13-1. Please refer to page 7, line 7 through page 8, line 21 of your testimony. Did you perform a statistical analysis to determine the number of data observations that would constitute a statistically accurate sample in your data collection efforts? If your answer is yes, please delineate the methodology.

(a) Did you perform a statistical analysis and/or stratification to determine which routes should be selected for data collection? If your answer is yes, please provide the analysis.

(b) Please indicate whether the resulting database could be considered random and representative of the population, including all pertinent documentation on which you base your conclusions.

(c) Did you perform an analysis of the statistical implications of the decision to eliminate potential implementation sites that did not have Delivery Unit Computers?

RESPONSE:

Yes, as part of the ES study we also time studied the carrier tasks. We determined the sample size for the number of time studies to have reference data on the rate at which carriers were performing various tasks. The number of time studies was the guide for the number of routes studied. We had performed a similar job for a previous client and used the following calculations to determine the sample size for time studies.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

Sample Size and Recommended Observation Days

Calculations

by Tom Short

for H.B. Maynard and Co.

June 15, 1995

1. To illustrate the method I used for the calculations, I chose the data for the first four numbered tasks (1.10, 1.20, 1.40, and 1.50) in Point to Point Provisioning, since these had non-missing Volumes and Estimated Times for the most part.

Here are the data:

Task	AT&T		MCI		Sprint		General		Wireless	
	Weekly Volume	Est. Time								
1.10	491.5	22	361.75	11	43.25	.	107.00	.	359.25	16
1.20	380.00	25	243.50	10	68.50	32	263.00	20	344.75	27
1.40	1463.50	35	955.50	60	256.25	55	926.50	65	1068.50	45
1.50	297.75	20	371.25	35	74.00	20	340.25	.	509.50	.
Staff	62		7		12		35		8	

2. I divided the Weekly Task Volume by the number of employees to get

$n = \text{Volume per 40 hours.}$

3. I computed the Percent Allowed Deviation for each Task and Customer combination using the following formula:

$$r_i = 5 \sqrt{\frac{T}{n \cdot t}} = 5 \sqrt{\frac{2400}{n \cdot t}}$$

where t = Estimated Time for each task, and T is called the "balancing time." In this case $T = 2400$ = the number of minutes in a 40 hour week.

The value 5 in the formula represents the desired accuracy of $\pm 5\%$ for a 40 hour week. It could be adjusted if necessary.

The quantity r_i comes out of the MOST literature on work measurement. In statistical terms, it provides a target precision for each task in the form of a "slot". The idea is that an overall precision of $\pm 5\%$, say, for a forty hour week can be achieved by placing Allowed Deviations on the individual Task times. (My statistical understanding is that this is like controlling the overall error rate in a multiple comparisons procedure like Tukey's Honestly Significant Differences or Bonferroni intervals after an Analysis of Variance test.)

4. I computed Upper and Lower Limits for the "slots" or intervals on each Task and Customer combination by adding and subtracting a margin of error, denoted by m :

$$t \pm t \left(\frac{r_i}{100} \right) = t \pm m$$

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

Here are the resulting limits, for each combination of Task and Customer:

Task	Lower and Upper Slot Limits				
	AT&T	MCI	Sprint	General	Wireless
1.10	(18,26)	(10,12)	.	.	(16,17)
1.20	(20,30)	(9,11)	(26,38)	(16,24)	(25,29)
1.40	(32,38)	(58,62)	(51,59)	(61,69)	(44,46)
1.50	(15,25)	(53,57)	(16,24)	.	.

These "slots" represent the target accuracies for the individual tasks that are supposed to allow for the overall time in a 40 hour period to be estimated to $\pm 5\%$.

5. In order to generate a sample size for each Task and Customer combination, I needed to find a standard deviation. For the lack of more information at this point, I propose making the variance of the time for each Task and Customer combination equal to the Estimated Time for the Task. Here are the resulting estimated standard deviations:

Task	Standard Deviations				
	AT&T	MCI	Sprint	General	Wireless
1.10	4.7	3.3	.	.	4.0
1.20	5.0	3.2	5.7	4.5	5.2
1.40	5.9	7.7	7.4	8.1	6.7
1.50	4.5	7.4	4.5	.	.

Ideally, we could obtain at least minimum and maximum times for each task, which would help to provide a more realistic estimate for the standard deviation.

6. I used the target width of the slot for each Task and Customer combination to compute recommended sample sizes. At a 95% confidence level, the formula for a required sample size is:

$$N = \left(\frac{1.96 \cdot \sigma}{m} \right)^2$$

The value 1.96 represents a 95% confidence level, and could be changed using a Normal distribution table. The values of m and σ correspond to the margin of error (half-width) for the slot and the estimated standard deviation of times for the task, both measured in minutes.

Assuming that the standard deviations are reasonable, here are the sample sizes required to achieve the target Allowed Deviations for each Task and Customer combination:

Task	Required Sample Sizes				
	AT&T	MCI	Sprint	General	Wireless
1.10	5	42	.	.	61
1.20	4	38	3	5	26
1.40	13	53	13	16	173
1.50	3	53	5	.	.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO INTERROGATORIES OF OCA

7. Given some control over selection of Tasks to be observed, Joe Redding suggests the following formula for estimating the Recommended Observation Days for each Task:

$$1.5 \times \text{Sample Size} \times \text{Estimated Time within Task and Customer}$$

In my opinion this represents the shortest length of time required to achieve the number of observations required for the precisions of the observed time estimates to fall within the Allowed Deviations.

Here are the results:

Task	ATRT	MCI	Spmt	General	Witness
1.10	0.3	1.4	.	3.1	
1.20	0.3	1.2	0.3	2.2	
1.40	1.6	10.9	2.2	3.3	24.3
1.50	0.2	9.1	0.3	.	

The values at MCI and Witness for Task 1.40 are extremely large because the data report a large Volume with a large Estimated Time and a small Staff. The combination of values for these two cells do not seem realistic, and if they are adjusted or corrected, the Recommended Observation Days for these two cells will be more reasonable.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

(a) No, we did not perform a statistical analysis and/or stratification to determine which routes should be selected for data collection. We did after Phase 1 and 2 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.

(b) Based on the comparison of the data we collected from the random routes to the Postal Service selected routes we feel the all data should be considered as random and representative of the population.

(c) No, we did not perform a statistical analysis of the implications of the decision to eliminate sites that did not have delivery unit computers.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

OCAUSPS-T13-2. Why did you perform a two-phase study for the data collection?

(a) Did you have a methodology that presented the statistical implications of such an approach? If so, please explain.

RESPONSE:

The initial Task Order anticipated that all the work could be accomplished by the end of Phase 1. As the complexity of the needs and potential opportunities became more apparent the Postal Service decided to continue the project with the Phase 2 study.

(a) The number of samples needed to support the confidence level and level of accuracy of the time studies were used as a guide for collecting data.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

OCAUSPS-T13-3. It is the OCA's understanding that letter carriers do not, in general, have their activities monitored by data collectors.

(a) Did you perform any analysis of potential differences between the work actions of the observed carriers on the days on which they were observed in comparison to their work actions on days during which they were not observed?

(b) Did you have access to any such studies or analyses performed by other researchers? If so, please provide copies of all documents related to such studies or analyses.

RESPONSE:

Letter carriers are accustomed to having their routes monitored by Postal Service supervisors, and having route inspections to determine both their in-office and on-street level of expectations.

(a) We did not perform any analysis of the potential differences between the work actions of the observed carriers on days on which they were observed in comparison to their work actions on days during which they were not observed.

(b) We did not access any such studies or analyses performed by other researchers pertaining to subjects differences in actions when being observed versus not being observed.

We did however perform analysis of data from the test sites after implementation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

OCAUSPS-T13-4. Please refer to Section IV of your testimony, headed "Procedure," on page 10 and following.

(a) Did you develop or have a handbook or other documentation used to convey the data collection procedure in a standardized way to all data collection personnel? If so, please discuss and provide the documentation furnished consistently to all personnel.

(b) Did you have training sessions conducted on a formal, consistent basis with all data collection personnel? If so, please discuss and provide all relevant information.

RESPONSE:

(a)-(b): The data collectors in Phase 1 participated in the inventory of the carrier tasks, assisted with development of the data collection approach, and participated in the pilot study to perfect the data collection approach. During Phase 2 new data collectors were placed with Phase 1 data collectors to receive on the job instruction as to the data requirements and techniques used. They also received on the job instruction from Postal Subject Matter Experts. In Phase 2, there were three Phase 1 collectors teamed with six new collectors for 3 weeks for on the job instruction, then these nine were teamed with 18 additional collectors for 2 weeks for on the job instruction. Then the three collectors from Phase 1 formed the Quality Control – rovers, and twelve 2-person teams formed the collection group.

Team members reviewed a book of Postal Forms carriers may fill out, pictures of Postal equipment and mailboxes/drops, and a book of bar codes. The experienced contractors and Postal Subject Matter,experts worked with the contractors.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

Any additional Phase 2 contractors were placed with the two person teams and received on the job instruction and instruction from a Postal Service Subject Matter Expert.

ES materials used in support of on the job instruction are being provided in Library References to be filed shortly: 1. Engineered Standards Book of Forms/Pictures Library Reference USPS-LR-I-220, a book of forms and pictures developed and used by the Postal Subject Matter Expert, and 2. Engineered Standards Book of Bar Codes Library Reference USPS-LR-I-221, the bar code book developed in Phase 1.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

OCAUSPS-T13-5. Please refer to Section V, "Quality Assurance" of your testimony on page 13. In this section you discuss the review and correction of potential data collection errors.

(a) Please provide information on the total number of data observations accepted as correct, the number of observations determined to be incorrect, and the statistical (or other) rules and methodologies used to eliminate the observations considered as being incorrect,

(b) Did you perform an analysis of the outliers? If so, please provide the analysis and statistical tests used.

RESPONSE:

(a) Observers would mark on the reports records that were improperly scanned. They used their daily comments logs to assist in remembering scans for possible edits. A count of these records was not maintained. Data base administrators would identify other possible scans by reviewing reports and scans of other data collected. They would discuss possible edits with the teams before any changes were made. A count of these records was not maintained. Estimate to be less than 0.1 percent.

(b) No, analysis was performed on the outliers.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

OCAUSPS-T13-6. Please refer to page 14 of your testimony, lines 7 through 8 where your state, "Of the 844 route-days observed 100 route-days were studied from sites and routes chosen at random."

(a) Were the randomly observed routes representative of the population of routes? Please explain.

(b) Do you have a study to verify whether the aforesaid routes were random?

(c) Were the remaining 744 route-days a sample that was not random? Do you have a study or analysis of the statistical accuracy of the 744 nonrandom route-days? If so, please provide all related documents.

(d) Would the data you provided to witness Baron have produced significantly different proportions if only the random sample were used to generate the proportions? If only the nonrandom sample were used?

(e) Please provide separate data sets for the random and nonrandom samples.

RESPONSE:

(a) The randomly observed routes are a respectable sample but is not large enough to represent the total population of routes. It does not include the demographics of: carrier classification mix, route type mix, delivery point mix, age and gender mix for the ES study.

(b) We used Excel® to generate a random number list for the Postal Service to use in the selection of the random sites. The Postal Service picked the sites in my presence from a listing of finance numbers. The data collectors then used an Excel® random number list to pick the routes.

(c) We did no additional analysis to determine if the routes were random. The remaining 744 route-days were from Postal Service picked sites but randomly picked routes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

(d) We do not believe the data provided to witness Baron will produced significantly different proportions if only the random sample is used or if only the Postal Service selected sites sample is used.

(e) The following is a listing of CY codes for sites selected by the Postal Service and at random. This information will allow you to use Library Reference USPS-LR-I-163 to sectionalize the data into sites picked by the Postal Service and at random.

CY02	Allegheny	Region
CY03	Allegheny	Region
CY04	Allegheny	Region
CY05	Southwest	Region
CY06	Southwest	Region
CY07	Southwest	Region
CY08	Southeast	Region
CY09	Southeast	Region
CY10	Southeast	Region
CY11	Pacific	Region
CY14	Western	Region
CY15	Western	Region
CY16	Western	Region
CY17	NY Metro	Region
CY18	NY Metro	Region
CY19	NY Metro	Region
CY20	Mid Atlantic	Region
CY21	Mid Atlantic	Region
CY22	Mid Atlantic	Region
CY23	Northeast	Region
CY26	Mid West	Region
CY27	Mid West	Region
CY28	Mid West	Region
CY29	Great Lakes	Region
CY30	Great Lakes	Region
CY31	Great Lakes	Region
CY32	Northeast	Random
CY33	Northeast	Random
CY34	NY Metro	Random
CY35	Southwest	Random
CY36	Great Lakes	Random
CY37	Great Lakes	Random

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

CY38	Allegheny	Random
CY39	Midwest	Random
CY40	Great Lakes	Random
CY41	Great Lakes	Region
CY42	NY Metro	Region
CY43	NY Metro	Region
CY44	Southeast	Region
CY45	Southeast	Region

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

OCAUSPS-T13-7. Please refer to page 7 of your testimony, line 19, through page 8, line 4, which discusses the selection process for zip codes, cities, and carrier routes.

(a) Please provide copies of the paperwork, including memos, letters, emails, faxes, studies, and/or other documents, sent internally by the Postal Service management to the various proposed data collection site locations.

(b) Please indicate what criteria, studies, and analyses were used in determining the selection of the sites in (a).

(c) If information as to the selection process by the various criteria is unavailable to you, please refer this interrogatory to the Postal Service.

RESPONSE:

(a) The following are examples that were emailed to the regions to use in the selection of sites.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

From: [REDACTED] Re: Delivery Methods & Standards
 Date: 2/25/00 3:45:26 PM Eastern Standard Time
 From: [REDACTED]@email.usps.gov ([REDACTED])
 To: [REDACTED]@dol.com (RPM12901)

Pacific Area's response.

Forward Header

Subject: Re: Delivery Methods & Standards
 Author: [REDACTED] at SBCA002L
 Date: 8/20/96 2:38 PM

As my secretary, [REDACTED], relayed to you on August 15, the [REDACTED] District has been designated as the location to select test sites for the Delivery Methods and Engineered Standards project. The [REDACTED] District has selected [REDACTED] for the testing as that city matches your selection criteria. The [REDACTED] District contact is [REDACTED] and he can be reached at [REDACTED]. If you need any further assistance, please let me know.

Reply Separator

Subject: Delivery Methods & Standards
 Author: [REDACTED] at ERDHODSS
 Date: 8/15/96 9:36 AM

[REDACTED]

We had hoped that each Area would participate in the Delivery Methods & Engineered Standards project. It is not mandatory. We simply felt that the buy-in from the Areas and the NALC would be better if all Areas were involved. The NALC has been notified and is invited. We will be going to our first Experimental Site by the 9/3. This site will be used to determine how we will collect data at the other sites. I had sent two messages asking for test sites in your Areas. Please consider involvement in this project.

First message 7/22/96

Gentlemen,

Engineering has contracted with [REDACTED] for the development of engineered City Carrier methods and standards. Our customer is Operations Redesign, who was tasked by [REDACTED] Headquarters Delivery, Labor Relations, and Operations Redesign is being kept informed of all activities by Engineering and the contractor team.

We need ten cities, one in each Area, where up to three delivery units per city could be used to collect data. The units should have a high DPS volume. There must be a mixture of routes, mounted, part and

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.**

Reply Separator

Subject: Re: Delivery Methods & Standards
Author: [REDACTED] at CS&L001L
Date: 7/30/96 2:17 PM

Great Lakes Area submits the [REDACTED] post office in the Royal Oak Performance Cluster.

Reply Separator

Subject: Delivery Methods & Standards
Author: [REDACTED] at ERDHQDSS
Date: 7/22/96 12:34 PM

Gentlemen,

Engineering has contracted with [REDACTED] for the development of engineered City Carrier methods and standards. Our customer is Operations Redesign, who was tasked by [REDACTED] Headquarters Delivery, Labor Relations, and Operations Redesign is being kept informed of all activities by Engineering and the contractor team.

We need ten cities, one in each Area, where up to three delivery units per city could be used to collect data. The units should have a high DPS volume. There must be a mixture of routes, mounted, park and loop, business and residential. No Rural Carriers are to be observed.

The team will be there four weeks, starting October 7 with some starting as late as January 6. We would like to visit, not to collect data, a few times before that. Six to eight full time people with occasional visitors are expected to be used. They will have a hand held device which be used for the time study data collection. It looks like a pocket calculator. There will also be clipboards/note pads to record on.

We have asked [REDACTED] to assist at the selection of units to use. We are seeking your permission and selection of units to study. The Delivery Perfect team has asked that we not use any units with the same NALC local as their test sites. Any visit to a unit would be coordinated through you.

Forwarded with Changes

From: [REDACTED] at BLLD02L
Date: 10/9/96 12:15PM
To: [REDACTED] ERDHQDSS
*cc: [REDACTED]
*cc: [REDACTED] at BMD01L
*cc: [REDACTED] at ROM001L
*subject: Re[3]: Delivery Methods & Standards

Forwarded with Changes

From: [REDACTED] at CS&L001L
Date: 8/1/96 8:12AM
To: [REDACTED] ERDHQDSS
cc: [REDACTED] at BMD01L

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO INTERROGATORIES OF OCA.

loop, business and residential. No Rural Carriers are to be observed.

The team will be there four weeks, starting October 7 with some starting as late as January 6. We would like to visit, not to collect data, a few times before that. Six to eight full time people with occasional visitors are expected to be used. They will have a hand held device which be used for the time study data collection. It looks like a pocket calculator. There will also be clipboards/note pads to record on.

We have asked [redacted] to assist at the selection of units to use. We are seeking your permission and selection of units to study. The Delivery Perfect team has asked that we not use any units with the same NALC local as their test sites. Any visit to a unit would be coordinated through you.

Follow up message 8/5/96

Thank you for your responses to the request for data collection sites for the Delivery Methods & Standards Study. We have received responses from 8 of the 10 areas.

The suggested locations from the Areas are:

- Allegheny Area: [redacted]
- Great Lakes Area: [redacted]
- Mid-Atlantic Area: [redacted]
- Mid-West Area: [redacted]
- New York Metro Area: [redacted]
- Northeast Area: No information yet
- Pacific Area: No information yet
- Southeast Area: [redacted]
- Southwest Area: [redacted]
- Western Area: [redacted]

Forwarded with Changes
From: [redacted] at SBCA0071

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

(b)-(c) There were no studies, analysis, or listing of criteria that ended up as part of the selection of sites that I am aware of, other than having a delivery unit computer and city carriers.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF OCA.

OCAUSPS-T13-8. Please refer to your testimony on page 5, lines 3 through 5, wherein you indicate that the objective of the study was to gather data to establish a workload managing system.

(a) Were the data collected specifically for this rate case, or were the data collected for other, possibly additional, objectives? Please explain your answer in detail.

(b) If the data collection was undertaken for purposes other than this rate case, please identify when the Postal Service decided to use the data for the rate case. Please provide all related documents.

(c) Were any changes made to the data (scrubs, adjustments, estimates, modifications, etc.) in order for the data to be used in this rate case?

RESPONSE:

- (a) The data were not collected specifically for this rate case. The data was collected to support the development of Industrial Engineered based methods and time standards, and a workload management system for city carriers.
- (b) Some time in August – September 1999 is when I was first contacted. All discussions were verbal.
- (c) No, adjustments were made.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
RULING NO. R2000-1/15 MOTION TO COMPEL RESPONSES TO UNITED PARCEL
SERVICE INTERROGATORIES UPS/USPS-T13-1 AND 2**

UPS/USPS-T13-1. Refer to page 5 of your testimony, where you state that the purposes of the Engineered Standards/Delivery Redesign project were to develop engineered methods and time standards for city carrier activities, to analyze and validate city carrier work methods, and to provide activity frequency information to determine the portion of time carriers spend doing these activities. Please provide copies of the final report and all interim reports regarding carrier activities developed as a result of the Engineered Standards/Delivery Redesign project.

RESPONSE:

See USPS-LR-I-242, produced subject to protective conditions. See Presiding Officer's Ruling No. R2000-1/15.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
RULING NO. R2000-1/15 MOTION TO COMPEL RESPONSES TO UNITED PARCEL
SERVICE INTERROGATORIES UPS/USPS-T13-1 AND 2**

UPS/USPS-T13-2. You state in your testimony that "The objective of the Engineered Standards was to collect actual activities of the city letter carrier and to develop engineered methods and time standards to establish a workload managing system." USPS-T-13, at 5.

- (a) What is the purpose of the time standards to which you refer?
- (b) Provide the time standards for carrier activities that resulted from the Engineered Standards/Delivery Redesign project. If final standards have not been prepared, provide any interim standards that have been developed.
- (c) Explain how these time standards are used by the Postal Service.
- (d) If final or interim time standards resulting from the project have not been adopted, provide the standards currently being used.

RESPONSE:

(a) The purpose of the time standards was to create standard times for performing city carrier activities based on engineered methods for use in workload managing. These time standards were installed at a few test sites and evaluated for possible future use nationwide by the Postal Service.

(b) See USPS-LR-I-242, produced subject to protective conditions. See Presiding Officer's Ruling No. R2000-1/15.

(c) See (a), above.

(d) See USPS-LR-I-242, produced subject to protective conditions. See Presiding Officer's Ruling No. R2000-1/15.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-3. Refer to Appendix A, page 17, of your testimony, where you present a process flow for delivery activities.

(a) Confirm separately each of the following.

(i) The process flow labeled "Park & Loop" shows that, for any given stop, the carrier first completes activities related to collection, delivery, and accountables for "non-parcel" mail.

(ii) After the completion of these activities for a stop, and if the carrier has not completed the loop, the carrier continues to the next stop where non-parcel mail collection, delivery, and accountable activities are first completed. If you do not confirm, explain.

(b) Confirm that the process flow labeled "Park & Loop" shows that after the carrier completes a loop, the carrier then performs activities related to "parcels." If you do not confirm, explain.

RESPONSE:

(a) (i) Not confirmed. "Parcel" mail is handled in the same manner as all other mail, except in instances when the size, shape, or weight of the piece mandates that the piece be handled separately from other pieces on the loop. In those instances where a dedicated access and delivery are mandated by a "parcel's" size, then your description in "(i)" is the typical process.

(ii) Consistent with my answer to "(i)" above, yes, this is the typical process.

(b) Consistent with my answer to "(i)" above, yes, this is the typical process.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-4. (a) Consider the following factual scenario. A carrier on a park and loop route has completed collection, delivery, and accountable activities for "non-parcel" mail on the loop. The carrier has two "parcels" in the Long Life Vehicle (LLV) that remain to be delivered to two different addresses on the loop. Consider the following sequence of activities that the carrier could use in order to deliver the parcels:

- Step 1:** The carrier walks to the LLV after completion of the loop.
- Step 2:** The carrier drives the LLV to the address where the first parcel is to be delivered.
- Step 3:** The carrier retrieves the first parcel from the LLV.
- Step 4:** The carrier walks to the first residence to deliver the parcel
- Step 5:** The carrier delivers the parcel.
- Step 6:** The carrier walks to the vehicle from the first residence.
- Step 7:** The carrier drives to the second residence.
- Step 8:** The carrier retrieves the second parcel from the LLV.
- Step 9:** The carrier walks to the second residence to deliver the parcel.
- Step 10:** The carrier delivers the parcel.
- Step 11:** The carrier walks to the vehicle from the second residence.
- Step 12:** The carrier drives to the next loop to continue deliveries.

Confirm that this sequence of activities (Step 1 through Step 12) is consistent with standard Postal Service delivery practice for parcels and show, in a manner similar to the examples provided in pages 11-12 of your testimony, how each of the preceding steps 1 through 12 should be recorded in the Engineered Standards database. If you do not confirm, (i) describe the standard Postal Service delivery practice for parcels in the factual scenario provided, and (ii) identify the source (manual, handbook, etc.) of standard Postal Service delivery practice for parcels, and (iii) in a manner similar to the examples provided in pages 11-12 of your testimony, show how each of the preceding steps 1 through 12 should be recorded in the Engineered Standards database.

- (b)** Confirm that carriers do on occasion follow the sequence described in (a) in situations such as that indicated.
- (c)** Describe the circumstances under which the carrier would be likely to follow the sequence in (a) in situations such as that indicated.
- (d)** Describe the circumstances under which the carrier would not be likely to follow the sequence in (a) in situations such as that indicated.

RESPONSE:

(a)

- Step 1:** The carrier walks to the LLV after completion of the loop.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S00	T05	K10
On Route	N/A	Park & Loop	N/A	Walking	Walking Flat

Step 2: The carrier drives the LLV to the address where the first parcel is to be delivered.

This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

Step 3: The carrier retrieves the first parcel from the LLV.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L08	A00	WT03	S04	J04	K01
Vehicle	N/A	Park & Loop	Residential Outside	Parcel	LLV

Step 4: The carrier walks to the first residence to deliver the parcel.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	K10
On Route	N/A	Park & Loop	Residential Outside	Parcel	Walking Flat

Step 5: The carrier delivers the parcel.

This would be *Load* time.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	H10
Point of Delivery	N/A	Park & Loop	Residential Outside	Parcel	Drop to Customer

Step 6: The carrier walks to the vehicle from the first residence.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K10
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	Walking Flat

Step 7: The carrier drives to the second residence.

This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

Step 8: The carrier retrieves the second parcel from the LLV.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L08	A00	WT03	S04	J04	K01
Vehicle	N/A	Park & Loop	Residential Outside	Parcel	LLV

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

Step 9: The carrier walks to the second residence to deliver the parcel.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	K10
On Route	N/A	Park & Loop	Residential Outside	Parcel	Walking Flat

Step 10: The carrier delivers the parcel.

This would be *Load* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	J04	H10
Point of Delivery	N/A	Park & Loop	Residential Outside	Parcel	Drop to Customer

Step 11: The carrier walks to the vehicle from the second residence.

This would be *Route/Access FAT* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K10
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	Walking Flat

Step 12: The carrier drives to the next loop to continue deliveries.

This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

(a) (i) Yes, this is the typical process, unless the carriers can take the parcels with them as they start the loop delivery process

(b) Yes, this is the typical process unless size or weight impact the delivery process.

(c) This is the typical process unless size and weight impact the delivery process.

(d) The following are typical circumstances under which the carrier would not be likely to follow the sequence in (a):

- 1. The parcel to be delivered is to the first delivery point on the park & loop and is of a size and weight the carrier can take it along with the delivery of the non-parcel mail.**
- 2. The residence for the parcel delivery is a few delivery points into the loop sequence so the carrier adjusts the park point to in front of the delivery point. The carrier will walk to the first delivery point and deliver the loop sequence. As the carrier is walking to the delivery point requiring the parcel the carrier will stop by the vehicle and obtain the parcel, and take it along with the non-parcel mail.**
- 3. Customers meet the carrier at their vehicle to obtain their parcels.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-5. Consider the following factual scenario. A carrier on a park and loop route has completed collection, delivery, and accountable activities on the loop for "non-parcel" mail. The carrier has two "parcels" in the Long Life Vehicle (LLV) that remain to be delivered to two different addresses on the loop. Suppose that the carrier has completed delivery of the first parcel and the carrier's activity is sampled while driving the LLV to the second parcel stop.

(a) In a manner similar to the examples that are provided in pages 11-12 of your testimony, describe how this driving activity should be recorded in the Engineered Standards database.

(b) Do the Engineered Standards data collection instructions recognize that driving activities may be performed solely in support of a particular product or service or group of products or services? If so, how is a driving activity associated with a specific product or service or group of products or services in the Engineered Standards data?

(c) Provide by product or service all data related to instances where driving activities are performed solely in support of a particular product or service or group of products or services.

(d) Confirm that it is standard practice for a letter carrier on a park and loop route to deliver parcels only after all non-parcel mail is delivered on the loop.

RESPONSE:

(a) This would be *Driving* time.

Level 10	Level 11.1	Level 11.2	Level 11.3	Level 11.4	Level 11.4.1
L13	A00	WT03	S04	T02	K01
On Route	N/A	Park & Loop	Residential Outside	Travel b/t Delivery	LLV

(b) NO.

(c) There is no work sampling data to supply this information.

(d) Yes, this is the typical process, unless the carriers can take the parcels with them.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-7. There are twelve records in USPS-LR-I-163 (the Engineered Standards Database) in which the Activity is "Parcel" and the STS Type is "Driving Time."

(a) Explain why parcel activity is combined with driving time in each of these twelve records.

(b) Do any of these twelve records represent driving time for a dedicated parcel run?

(c) Do any of the twelve records represent driving time spent solely in order to deliver a parcel or parcels on a route that is not solely dedicated to making parcel deliveries?

(d) Were these data used to apportion any part of driving time to specific products or services or groups of products or services? If so, to what products or services, and how much time was so apportioned? If not, why not?

RESPONSE:

(a) The following are the twelve records referred to in USPS-LR-I-163 where the Activity is "Parcel" and the STS Type is "Driving Time."

Row #	Unit Code	Route #	Site Loc.	Time			Activities	Work Type	STS Type
1	CY14	3705	On Route	10:32	Park & Loop	Resident Outside	Parcel	LLV	Driving Time
2	CY14	3705	Vehicle	14:33	Park & Loop	Resident Outside	Parcel	LLV	Driving Time
3	CY36	0480	Vehicle	12:41	Park & Loop	Resident Outside	Parcel	LLV	Driving Time
4	CY34	3141	Vehicle	15:14	Dismount	Resident Outside	Parcel	LLV	Driving Time
5	CY46	1133	On Route	14:20	Central	Resident Outside	Parcel	LLV	Driving Time
6	CY55	0621	Vehicle	14:53	Park & Loop	Resident Outside	Parcel	LLV	Driving Time
7	CY46	1148	Vehicle	14:08	Dismount	Resident Outside	Parcel	LLV	Driving Time
8	CY46	1148	Vehicle	14:14	Dismount	Resident Outside	Parcel	LLV	Driving Time
9	CY50	8735	Vehicle	12:26	Dismount	Business Inside	Parcel	Drop to Cust'er	Driving Time
10	CY46	1145	Vehicle	12:40	Dismount	Resident	Parcel	N/A	Driving

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

						Outside			Time
11	CY50	8759	Vehicle	11:41	Dismount	Resident Outside	Parcel	LLV	Driving Time
12	CY66	0130	Vehicle	16:27	Dismount	Resident Outside	Parcel	LLV	Driving Time

Each of these twelve records was reviewed by looking at the scans before and after the records and the observer's Daily Comments Log. The carrier has not deviated from his route, the vehicle is in motion, and he has a parcel in his possession in a prominent position in the vehicle. If the carrier had deviated from the route, and the driving was unique to parcels, the records would have been recorded differently, such as Location recorded as "Other Route."

Record Row 1 should remain STS Driving time.

Record Row 2 should remain STS Driving time.

Record Row 3 should remain STS Driving time.

Record Row 4 should remain STS Driving time.

Record Row 5 should remain STS Driving time.

Record Row 6 should remain STS Driving time.

Record Row 7 should remain STS Driving time.

Record Row 8 should remain STS Driving time.

Record Row 9 should be changed to STS Load Time due to an incomplete record edit. The Site Location should be Point of Delivery.

Record Row 10 should remain STS Driving time.

Record Row 11 should remain STS Driving time.

Record Row 12 should remain STS Driving time.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

(b) No, these records do not represent time spent on a dedicated route to deliver parcels.

(c) I can not discern from these scans that the sole purpose was to only deliver a parcel.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T13-8. Refer to the forty-six records in USPS-LR-I-163 (the Engineered Standards Database) in which the Activity is "Parcel" and the Delivery Type is "Park & Loop."

(a) The records of the observations made at 12:41:07 PM and 12:47:06 PM on December 6, 1996, have the same Unit Code (CY36) and Route Number (0480) but the Site Location is "Vehicle" for one and "On Route" for the other. Do these records provide an example of a run made on a park-and-loop route in order to deliver a parcel or parcels only? If so, has this six-minute time interval between the two records been allocated solely to parcels? If so, to what products or services, and how much time was so apportioned? If not, why not?

(b) The records of the observations made at 10:07:21 AM and 10:19:27 AM on August 11, 1997, have the same Unit Code (CY64), Route Number (1401) and Site Location ("Point of Deliver"). Does the twelve-minute interval between the two records provide an example of a run made on a park-and-loop route in order to deliver a parcel or parcels only? Has this twelve-minute interval between the two records been allocated solely to parcels? If so, to what products or services, and how much time was so apportioned? If not, why not?

RESPONSE:

(a) Unit Code CY36 Route Number 0480, was studied on December 5, 1996.

The scan made at 12:41:07 PM with the site location Vehicle, Park & Loop Route, Resident Outside, Parcel, LLV, was classified as a driving scan due to the carrier location and LLV. Looking at the scans before and after the 12:41:07 PM scan we can deduce that this was a Park & Loop section of a route. We can not deduce that the only reason that the driving was for a parcel. The scan that followed at 12:47:06 PM may or may not be related to the 12:41:07 PM scan. The scan at 12:47:06 PM with the site location On Route, also contained Park & Loop, Residence Outside, Parcel, and Walking which implies the carrier is

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

transporting a parcel to a delivery point and this scan has no further meaning. A number of other delivery points and mail could have been delivered during the six-minute time intervals between the scans. The distribution of time based on work sampling is not accomplished based on the time between the scans. The number of work sampling scans/tallies are totaled and ratios of particular groups of scans are made relative to total sets of scans. These ratios/distributions are then used to allocate/spread, time/cost to the particular subsets/groups of scans.

(b) Unit Code CY64 Route Number 1401, was studied on August 11, 1997. There was a scan made at 10:07 AM that suggest the carrier was at the LLV setting up to carry a Loop. Six minutes into the loop at 10:07 the carrier was dropping a parcel off to a customer. The carrier at 10:13 AM was On Route walking between deliveries sorting mail during the walking. The carrier at 10:19 AM was again dropping off a parcel to a customer. The carrier at 10:25 AM was again On Route walking between deliveries sorting mail during the walking. This pattern is typical of a Park & Loop section of a route where the carrier has been able to take the parcels along with the other mail being delivered. The twelve minutes between the 10:07 and 10:19 scan contain a scan at 10:13 that identifies other work is taking place between the 10:07 and 10:19 scans. A number of other delivery points and mail could have been delivered during the twelve-minute time intervals between the scans. The distribution of time based on work sampling is not accomplished based on the time between the scans. The number of work sampling scans/tallies are totaled and ratios of particular groups of scans are

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

**made relative to total sets of scans. These ratios/distributions are then used to
allocate/spread both time and/or cost to the particular subsets/groups of scans.**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T13-9. Refer to page 28 of your testimony, where you state that

"Level 11.4 'Js' identified delivery that were associated activities on route and were typically paired with Level 11.4.1 'Hs' . . ." (emphasis added). Refer also to page 29 of your testimony, where you state that "Level 11.4 'Fs' typically identified deliveries that required customer interaction on route and were typically paired with Level 11.4.1 'Gs' ." (emphasis added). There are only four records in USPS-LR-I-163 (the Engineered Standards Database) in which the level 11.4 Activity Code is "Parcels," Code J04; the level 11.4.1 Activity Detail Code is either E03 or H00. There are 650 records in the Engineered Standards Database that contain "Parcel," Code F02, as the activity. The majority of the level 11.4.1 Activity Detail Codes are either "Ks" or "Hs."

(a) Provide more detail as to the difference between Activity Code J04, "Parcels," and Activity Code F02, "Parcel."

(b) Provide examples of the differences between Activity Codes J04 and F02.

(c) Explain why, in these records, most of the Activity Code F02 records are paired with Activity Detail Codes "Ks" or "Hs" and not with Activity Detail Code "Gs."

(d) Provide documentation of specific instructions given to data collectors as to how they were to distinguish between Activity Codes J04 and F02. If explicit training materials do not exist, explain in detail what the data collectors were told in order to distinguish between Activity Codes J04 and F02.

RESPONSE:

(a-b) Activity Code J04 was primarily used for In-Office work sampling. There are only four records in the database that used the J04 code on outside work sampling activities. The use of these codes is not typical but implies that multiple parcels are being processed. Looking at the series of scans before and after the four J04 scans the following may assist in understanding the events that occurred.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

J04 Scans - Parcels

Unit Code	Route Number	Site Location	Time	Activities	Work Type	STS
CY38	8008	Vehicle	9:15 AM	Parcels	Mat'l Handling	Street Support
CY09	2451	Vehicle	9:33AM	Parcels	Mat'l Handling	Street Support
CY40	8408	Vehicle	8:22AM	Parcels	Mat'l Handling	Street Support

These three records imply that the vehicle was being loaded which is a Street Support activity.

J04 - Parcels on a Park & Loop - Business Outside - @ Point of Delivery

Unit Code	Route Number	Site Location	Time	Activities	Work Type	STS
CY11	4732	Point of Delivery	12:15PM	Parcels	N/A	Load

This record implies that multiple parcels were being delivered to the business customer. The carrier was at the delivery point and is therefore performing STS - Load.

Activity code F02-Parcel was intended to be used for Outside work sampling scans and J04-Parcels for In-Office work sampling. Both codes mean the carrier is working with parcels and additional scans are needed to better define the carriers actions.

(c) The activity code F02 - Parcel identifies that a particular type of mail being handled is a parcel. The "K" codes indicate a means of travel. The "H" codes indicate the details of the delivery point being served. The "F" Codes typically require customer interaction which when dealing with customers can lead into the

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

"G" Codes that further describe the customer interaction. If, all goes well the F02 Code would be paired with an "H" Code identifying the type of delivery point the parcel was being delivered to or with a "K" Code identifying the means of transporting the parcel.

(d) There was no specific documented instructions given to observers to distinguish between J04 and F02. The J04 code appears on the work sampling sheets for In-Office and the F02 code appears on the Outside work sampling sheets. Both codes mean the carrier is working with parcels and additional scans are needed to better define the carriers actions.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T13-10
THROUGH 14)**

UPS/USPS-T13-10. Provide a definition of "parcel," including size, cubic volume, and class of mail (if applicable), as used in the Engineered Standards Database. Provide supporting materials for your definition, such as training manuals or any other documentation.

RESPONSE:

The USPS Subject Matter Experts provided a verbal definition of a parcel. A parcel is a package that weighs two pounds or more, and/or is larger than a shoebox.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T13-10
THROUGH 14)**

UPS/USPS-T13-11. How does the carrier decide if a parcel is going to be a deviation parcel delivery?

RESPONSE:

I am unclear on exactly what you mean by a deviation parcel delivery. If you mean occasions when a carrier may change his normal delivery pattern to deliver a parcel out of sequence, then, based on my observations, this rarely occurs. I did not study the decision process behind such behavior.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T13-10
THROUGH 14)**

UPS/USPS-T13-12. Describe any standards, criteria, or guidelines with respect to weight and/or cubic volume of a parcel(s) regarding when a carrier should make a deviation delivery. If these are written, provide a copy of them.

RESPONSE:

I did not study "deviation deliveries" for purposes of my study. To my knowledge, there are not any standards, criteria or guidelines with respect to weight and/or cubic volume of parcel(s) regarding when a carrier should make a "deviation delivery." The only deviation which we allowed for would be if the carrier were to deliver parcels or other items for another route. This would have been recorded as "Other Route" in the sampling data if it had occurred. The "Other Route" entry covered this and other activities. There are only 5 tallies containing "Other Route." None of these relate to parcels.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T13-10
THROUGH 14)**

UPS/USPS-T13-13. What are the guidelines in regard to size or shape for a deviation parcel delivery? If there are written guidelines, provide a copy of them.

RESPONSE:

I am not aware of any guidelines regarding size or shape for a deviation parcel delivery. See my response to UPS/USPS-T13-12.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T13-10
THROUGH 14)**

UPS/USPS-T13-14. In the initial survey design for the Engineered Standards project, were there discussions of "deviation" delivery runs for parcels? If so, provide any notes, memoranda, or other documentation that includes these discussions.

RESPONSE:

The possibility that a carrier might not follow his normal delivery sequence, for a number of reasons, was discussed in the initial design for the Engineered Standards project, but this was not specifically studied. See my response to UPS/USPS-T13-12. There isn't any documentation of these discussions.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

UPS/USPS-T11-25. Refer to page 36 of the testimony of Postal Service witness Raymond, USPS-T-13, at 36. Witness Raymond defines one of the activities included in street support as obtaining and loading the vehicle. For each of the following questions, provide any written documentation or guidelines that support the response.

(a) What are the activities that the carrier is doing at the vehicle?

(b) What is the typical order of preparing/organizing Priority Mail for the route? Does the carrier sort Priority Mail for the route in the carrier station or in the vehicle?

(c) What is the typical order of preparing/organizing Express Mail for the route? Does the carrier sort Express Mail for the route in the carrier station or in the vehicle?

(d) What is the typical order of preparing/organizing the letters for the route? Does the carrier sort the letters for the route in the carrier station or in the vehicle?

(e) What is the typical order of preparing/organizing flats for the route? Does the carrier sort the flats for the route in the carrier station or in the vehicle?

(f) What is the typical order of preparing/organizing parcels for the route? Does the carrier sort the parcels for the route in the carrier station or in the vehicle?

(g) How does the carrier know that a particular stop has a parcel, e.g., does the carrier organize the vehicle to reflect parcels at particular stops?

(h) Suppose there are a number of large parcels for a given route, and the carrier has to make several trips to the vehicle to load the parcels and has to spend more time organizing the parcels in the vehicle.

(i) To which category-load, access, route, or office - are these activities assigned?

(ii) Are these activities specifically distributed to parcels?

RESPONSE

(a) The definition of Street Support Time is found in the Summary Description of USPS Development of Costs by Segments and Components, page 7-2: The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes. Based on my observations, the carrier unlocks the vehicle, starts it up, and relocates the vehicle to the

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

loading dock. The next step is to open the back of the vehicle and load in trays and tubs of mail along with the parcels. Other activities at the vehicle include loading trays of mail into the passenger side of the vehicle, organizing and prepping mail in the vehicle.

(b - c) Based on my observations, the carrier receives the Priority and/or Express mail from a roving accountable person/desk or by going to an accountable cage. Typically, the carrier cases these products with the other cased mail in delivery sequence. There are occasions where the carrier completes USPS form 3883 in the office that will allow a customer to sign one form and receive multiple pieces. Priority and Express mail are sorted in the office not in the vehicle.

(d) Letters are delivered to the carriers casing area. Approximately four feet of non-DPS letters are placed on the ledge of the casing equipment for the carrier to start casing upon arrival at the case. As the sorting/casing of letters into delivery sequence continues the carrier will replenish the supply of non-DPS letters on the ledge from tubs/trays of mail that have been delivered to the carrier work station/case. All letters are sorted into delivery sequence in the station (except mail for delivery at centralized locations, "jackpotting", and DPS letters). The carrier-sequenced mail and DPS letters are organized in the delivery vehicle for ease of handling at each stop.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

(e) Flats are delivered to the carriers casing area. Based on my observations, approximately six feet of flats are placed in a vertical flat receptacle adjacent to the casing equipment. Additional flats are located in tubs at the carriers' casing area. The carrier will obtain six inches or more of flats from the flat receptacle, place them on her arm, and then start casing into delivery sequence. As the sorting of flats continues, the carrier will replenish the supply of flats from the vertical flat receptacle or from tubs of flats at the carrier work station/case. All addressed flats are sorted into delivery sequence in the station (except flats for centralized delivery, or "jackpotting.")

(f) Based on my observations, after the carrier has completed the casing of letters and flats, the carrier will walk to a central area and obtain a hamper that contains the parcels for the route. The carrier places the trays/tubs of letters-flats-Express and Priority mail into the hamper on top of the parcels. The hamper is then moved to the clock area and the carrier clocks to the street. The hamper is relocated to the DPS area and trays of DPS are placed on top of the load. The carrier relocates the hamper to the back loading dock, goes and obtains the vehicle, or relocates the hamper directly to the vehicle. Typically, due to the small number, the carrier does not sort parcels.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

(g) During the vehicle loading process the carrier places the parcels in the vehicle in route-zone groupings. The carrier remembers where the first parcel is to be delivered. When collecting the first parcel for delivery, the carrier checks to see where the next parcel is to be delivered. As each parcel is collected for delivery the next parcel is checked to determine its delivery address and this process continues until all parcels are delivered.

(h)

(i) The times for these activities are included in street support.

(ii) No. Return trips for parcels are distributed in the same way as return trips for all other mail.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

POIR No. 8: The Postal Service is requested to provide the information described below to assist in developing a record for the consideration of its request for changes in rates and fees. In order to facilitate inclusion of the required material in the evidentiary record, the Postal Service is to have a witness attest to the accuracy of the answers and be prepared to explain to the extent necessary the basis for the answers at our hearings. The answers are to be provided within 7 days.

The Postal Service collected extensive tally data on city delivery carrier street activities as part of the Engineered Standards/Delivery Redesign project headed by witness Raymond. For reasons described in Presiding Officer's Ruling No. R2000-1/35, the Postal Service is asked to provide an in-depth discussion of how it identifies categories of carrier activity that are reflected in the more commonly occurring tally types. It is also asked to thoroughly articulate the general guidelines that its witnesses followed in assigning the activities associated with the more commonly occurring tally types to the STS categories of street time activity.

RESPONSE:

Library Reference USPS LR-I-163, contains the outside work sampling data used by witness Baron in this proceeding. In this library reference, 19 fields are associated with each of the 39,046 rows of data provided. Twelve of these fields (Level 10, Location with code, Level 11.1, Personal & Administrative with code, Level 11.2, Delivery type with code, Level 11.3, Delivery Type Status with code, Level 11.4, Outside Activity with code, Level 11.4.1, Activity Detail with code) constitute the outside work sampling portion of a carrier's day. The remaining 7 fields (which ultimately included an STS category label and code) allow for linking the rows of data back to the specific location, route, observer, job classification of the carrier observed, dates and times.

The following general steps were taken to classify each of the rows of data into the STS categories used by witness Baron: The first step was to create a frequency distribution of each of the actual combinations of the 12 work sampling

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

fields of the 39,046 rows of data. This distribution has been provided in Library Reference USPS LR-I-281. This process reduced the 39,046 individual rows of data down to 1,350 rows of data with the frequency counts.

The following are two examples of rows of data from the frequency distribution:¹

Code	Location	Code	Personal & Admin	Code	Delivery Type	Code	Delivery Status	Code	Activities	Code	Activity Detail	Frequency Count
L12	Point Of Delivery	A00	N/A	WT02	Curb	S04	Resident Outside	J08	Del/Coll.	H06	#1 Box	3635
L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	T02	Travel Bet Divr.	K01	LLV	3501

The first row identifies that the carrier was located at the **Point of Delivery**, the carrier was not performing any **Personal or Administrative functions (N/A)**, the **Delivery Type** was **Curb**, the **Delivery Status** was **Resident Outside**, the carrier was performing the activity of **Delivering and/or Collecting** the mail, and the **Activity Detail** identifies that the point of delivery was a **#1 Rural Box**. There are 3,635 records out of the 39,046 records in the database that have this combination of work sampling scans. Each of these 3,635 rows are identical with respect to the 12 work sampling fields. The categorization process would focus principally on these twelve fields, and, on infrequent occasions, would refer to the remaining fields and underlying records when necessary to confirm the correctness of the STS categorization.

The next step in the classification process was to manually compare the definitions of the six STS categories to a particular row of data, and judgmentally

¹ Due to space limitations on this 8 ½ by 11 inch page, it was not possible to display all 19 fields. In any event, as will be seen in what follows, the key information for STS classification generally can be found in the 12 fields displayed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

assign the STS category that matched. Contrary to the impression in the minds of some, a computer did not perform the classification function.

The six category definitions that were used were:

1. **Load time:** "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and the providing of special services."
2. **Street Support time:** "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes."
3. **Driving time:** "Driving vehicles on all portions of letter routes other than the curblin portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it."
4. **Route/Access FAT time:** "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces."
5. **Route/Access CAT time:** "Vehicle driving time on the curblin portions of routes. Also includes the time spent driving up to curblin stops to load mail into and to collect mail from customer boxes."
6. **Collection time:** "The time spent walking up to and sweeping Express mail and non-Express mail collection boxes. The time spent driving vehicles up to the collection stops is included in Driving Time, as discussed above."

In many cases, the comparison to STS category definitions and assignment of an STS category was a fairly straightforward process. For example, consider the first row of data from the table above. The location **Point of Delivery** means the carrier has completed traveling to/accessing the delivery point. The activity **Delivery/Collect**, means that the carrier is engaged in one of several possible activities: obtaining the mail from the vehicle/satchel/hand/arm, fingering the mail for confirmation of address correctness, opening/closing the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

mail box, placing the mail into the #1 Box, and/or collecting the mail in the box and placing it into the collected mail container. Absent any contradictory information in the remaining fields, this row falls neatly within the STS definition of Load Time: "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and the providing of special services." None of the entries in any of the fields would lead to placement in any other STS category. The facts that the delivery type was **Curb**, and that the activity detail indicates a #1 Box, support the classification. For this reason, these 3,635 tallies were assigned an STS code 1, for Load Time.

As another example, consider the 3,501 records represented by the second row in the table above. The entries in this tally group show that the carrier was in the **Vehicle**, and was not performing any **Personal** or **Administrative functions (N/A)**. It shows that the **Delivery Type** was **Curb**, that the **Delivery Status** was **Resident Outside**, and that the carrier was performing the activity of **Traveling Between Delivery Points**, in an **LLV**. The combination of **Vehicle**, **Traveling Between Delivery Points**, and **Curb** provides a solid indication that these tallies fall within the definition of **Route/Access CAT time**: "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." Absent any conflicting entries in the remaining fields, these 3,501 records were assigned the STS code of 5, for **Route/Access CAT time**. The fact the carrier was serving **Resident Outside** deliveries, and was using an

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

LLV for delivery are additional supporting information in selecting the assignment of this row of data to the STS category of Route/Access CAT time.

This categorization process was painstakingly followed for every one of the 1,350 rows of data produced by the initial frequency distribution. After each of the 1,350 rows of data had gone through this process, another frequency distribution was produced placing all of the 1,350 rows that had been assigned to 1. Load Time, 2. Street Support, 3. Driving Time, 4. Route/Access Fat, 5. Route Access Cat, and 6. Collection Time, into a descending frequency-count arrangement by the STS categories. Library Reference USPS LR-I-281 includes this categorized frequency distribution in addition to the frequency distribution used at the beginning of the process. When the categorized frequency distribution was completed, it was used to double check the assigned STS codes. Again, each of the 1,350 individual rows was carefully reviewed to ensure that it met the appropriate STS definition.

Once each of the categorizations were finalized, a computer was used to expand the 1,350 rows back into 39,046 individual tallies, each tally now containing its associated STS code. This database with the 39,046 rows of work sampling data was now ready for presentation to witness Baron.

These specific examples of the more routine classification tasks described above provide insight into the general technique. Later in this response, I will provide many other specific examples to flesh out the process. Although the process proceeded on a tally group by tally group basis, however, I will now also attempt to provide some general guidelines underlying the procedure.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

In general, and especially among the more common tally types, there are two to three work sampling fields whose entries tend to determine the appropriate STS category, with an additional three or four fields providing information to support the classification. On some occasions, particularly with respect to the less frequently occurring tally types, additional information was used to verify the placement into the appropriate STS category.

In the following, I will attempt to indicate for each of the six STS categories, which of the tally fields played important roles, and suggest general classification rules that were implicit in our tally-type by tally-type analysis:

Load time

In general, the presence of Activity: **Delivery/Collection or Finger @**

Delivery is a strong indication that the appropriate STS category is Load time.

This rule was not appropriate on some occasions. For example, there are approximately 30 tallies in which the entry Location: **Relay Box** required the tally to be placed in the Street Support category instead of Load time despite the entry of Activity: **Delivery/Collection or Finger @ Delivery**. For another example, there are approximately 30 tallies in which the entry Location: **Collection Box** required the tallies to be placed in the STS category Collection time.

Street Support time:

In general, the presence of Activity of **Loading, Unloading, Setup, Travel to 1ST Delivery Point, or Return to Unit** is a strong indicator that the appropriate

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

STS category is Street Support time. However, if the Location was **Collection Box**, then the appropriate category is generally **Collection time**.

Driving time:

In general, the presence of Activity: **Travel Between Deliveries**, in combination with Delivery Type: **Central** or **Dismount** strongly indicates **Driving time**.

In general, if the Delivery Type is **Park and Loop**, and Location indicates that the carrier is in the vehicle (i.e. **Vehicle, In Vehicle at Stop, On Route, Park Point**), then **Driving time** is also indicated. There are important exceptions, however. For example, if, in addition to **Park and Loop** and **Vehicle**, Activities **Loading, Unloading, Setup, Travel to 1ST Delivery Point, or Return to Unit** are present, then **Street Support** is indicated.

Route/Access FAT time

In general, the combination of Activity: **Travel Between Deliveries**, with Delivery Types of **Foot Route, Park & Loop, Dismount, or Central Delivery**, with Activity Detail involving walking (i.e., **Walk Flat, Walk Obst, Walkg, Push Cart**) is sufficient to place scans into this category.

Note that a Delivery Type of **Curb** generally indicates **Route/Access CAT time**.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

Route/Access CAT time:

In general, the combination of Delivery Type: **Curb**, along Activity: **Travel Between Deliveries** is sufficient to place tallies into the Route/Access CAT time category. Note that when Activity is **Parcel** or **Accountable**, and the Activity Detail indicates **LLV** or **Jeep**, the tally remains in CAT because the carrier is still traveling between deliveries with those pieces of mail.

Collection time:

In general, Location: **Collection Box** and Activity: **Wait 4 Collectn** are strong indicators that the tallies should be placed into the Collection time category.

The twelve fields noted earlier in this response (and when necessary, the observers' comments logs, and/or the Postal Service form 3999X, and/or, in extremely rare cases, field-produced work sampling reports, to check the observers' edits or comments) were generally more than adequate to enable the assignment of the 1,350 actual combinations into the STS categories. While this was not always simple, it was not a forced fit. The STS definitions were "naturally occurring" categories based on a 1986 work sampling. It is not surprising that the actual observations contained in the ES database used by witness Baron also tended to coalesce into major groupings of frequently-occurring tally configurations that conformed to the STS groupings.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

In the attachment to this response, to flesh out the categorization process used, I have prepared tally-group by tally-group descriptions of the key considerations underlying the STS classifications for almost 36,000 tallies, most of them being frequently occurring types. These tally groups represent over 90 percent of all of the data used by witness Baron.

In the descriptions provided, it can be seen that the STS categorizations were not always as straightforward as the general rules outlined earlier would seem to imply. For example, the fifth of the tally types on page 5 of 40 of the initial, uncategorized frequency distribution contained in LR-I-281 (the second of the two distributions in the library reference), represents 35 tallies with the following characteristics:

Location: **On Route**; Personal and Administrative: **N/A**; Delivery Type: **Central**; Delivery Type Status: **Resident Outside**; Activity: **Travel B/t Divr**; Activity Detail: **LLV**

It can be seen that carrier is located "On Route." This entry, combined with the activity of "Traveling between Deliveries (Travel B/t Divr.) and with the delivery type, Central, leaves open the possibility that either Driving time or Route/Access FAT is the appropriate STS classification. Note, however, that the record does not indicate a curb delivery, so the category Route/Access CAT time can be eliminated. In order to determine the appropriate STS classification, at least one additional piece of information is required. In this case, the final piece required in this record is the activity detail of "LLV." This detail places the carrier in the vehicle, consistent with Driving time. (If the detail had indicated walking, the tally might have been placed in STS category Route/Access FAT time). The

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

remaining portions of the record provide more supporting information, indicating that the carrier was outside in the vehicle. This example demonstrates that usually, the less frequently occurring the tally configuration, the more information was needed to make a definitive classification.

The list of tally group analyses follows.

Number Code Location Code Personal Code Delivery Type Code Delivery Type Status
of tallies

Code Activities Code Activity Detail
 3635 L12 Point of Deliver A00 N/A WT02 Curb S04 Resident Outside
 J08 Del/Coll. H06 # 1 Box

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points. The mailbox type is the most common curb box in the United States, a #1 box. Based on the definition this information is supportive in to determining the STS category.

3501 L08 Vehicle A00 N/A WT02 Curb S04 Resident Outside
 T02 Travel B/t Divr. K01 LLV

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these data points the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to start the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries. The definition is now complete. The carrier is using the LLV to travel between deliveries and on the residential outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification, but provide a better definition as the mode of travel.

2474 L12 Point of Deliver A00 N/A WT05 Central S04 Resident Outside
 J08 Del/Coll. H13 Central Outside

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, in a residential neighborhood of outside delivery points. Based on the definition this information is supportive in determining the "load time" classification.

1573 L13 On Route A00 N/A WT03 Park & Loop S04 Resident Outside
 T02 Travel B/t Divr. K10 Walk Flat

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.

986 L08 Vehicle A00 N/A WT04 Dismount S04 Resident Outside
 T02 Travel B/t Divr. K01 LLV

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time". The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential outside portion of the route.

899 L12 Point of Deliver A00 N/A WT02 Curb S04 Resident Outside
 J08 Del/Coll. H11 Gang Box

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a gang box. Based on the definition this information is supportive in determining the "load time" classification.

895 L13 On Route A00 N/A WT03 Park & Loop S04 Resident Outside
 T03 Trav B/t w/sort K10 Walk Flat

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries and fingering or sorting the mail as the activity. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.

788 L12 Point of Deliver A00 N/A WT03 Park & Loop S04 Resident Outside
 J08 Del/Coll. H09 1 Hand Slam

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Park & Loop type delivery, in a residential neighborhood of outside delivery points using a one-hand slam method. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

780	L12 Point of Deliver	A00 N/A	WT05 Central J08 Del/Coll.	S03 Resident Inside H12 Central Inside
-----	----------------------	---------	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, in a residential neighborhood of inside delivery points to a central type box. Based on the definition this information is supportive in determining the "load time" classification.

665	L08 Vehicle	A00 N/A	WT05 Central T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
-----	-------------	---------	--------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential outside portion of the route.

654	L12 Point of Deliver	A00 N/A	WT02 Curb J12 Finger @ Deliver	S04 Resident Outside H06 # 1 Box
-----	----------------------	---------	-----------------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger at Deliver." is also consistent with the "load time" definition as the action of sorting mail at the delivery point. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a #1 type box. Based on the definition this information is supportive in determining the "load time" classification.

654	L12 Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H07 # 1-1/2 Box
-----	----------------------	---------	----------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a #1-1/2 type box. Based on the definition this information is supportive in determining the "load time" classification.

598	L14 P B L	A02 Sbj Break	WT02 Curb T00 N/A	S00 N/A H00 N/A
-----	-----------	---------------	----------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. That is a break cannot be assigned to any of the other STS categories.

549	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S01 Business Inside H10 Drop to Cust
-----	----------------------	---------	--------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services" The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the inside business delivery portion of a route. The load time definition is further supported by the "Drop to Cust" activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". Based on the definition this information is supportive in determining the "load time" classification.

488	L08 Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S01 Business Inside K01 LLV
-----	-------------	---------	---------------------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business inside delivery type portion of the route.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	------	----------	---------------	--------------------	---------------------------

				Code Activities	Code Activity Detail
--	--	--	--	-----------------	----------------------

469	L08	Vehicle	A00 N/A	WT02 Curb J11 Setup	S04 Resident Outside K01 LLV
-----	-----	---------	---------	------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery. The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb route.

451	L08	Vehicle	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
-----	-----	---------	---------	--	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential outside delivery type portion of the route.

445	L13	On Route	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S04 Resident Outside K10 Walk Flat
-----	-----	----------	---------	---------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.

431	L13	On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K09 Walking
-----	-----	----------	---------	--	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "walking" provides some additional information about the conditions the carrier faces.

405	L08	Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K01 LLV
-----	-----	---------	---------	-------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery. The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a park and loop route.

358	L08	Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S02 Business Outside K01 LLV
-----	-----	---------	---------	---------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business outside delivery type portion of the route.

337	L12	Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H06 # 1 Box
-----	-----	------------------	---------	--------------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services". The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route to a #1 type mailbox. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail
312	L12 Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H08 # 2 Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services". The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route to a #2 type mailbox. Based on the definition this information is supportive in determining the "load time" classification.</p>				
309	L08 Vehicle	A00 N/A	WT02 Curb T04 Return to Unit	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Return to Unit" satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, returning from the residential outside portion of a curb route.</p>				
288	L13 On Route	A00 N/A	WT02 Curb T02 Travel Bt Dvr.	S04 Resident Outside K01 LLV
<p>STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblane portions of routes. Also includes the time spent driving up to curblane stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel Bt Dvr.). The definition is now complete. The carrier is using the LLV to travel between deliveries and on the residential outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification and provide a better definition as the mode of travel.</p>				
276	L14 P B L	A02 Sbj Break	WT03 Park & Loop T00 N/A	S00 N/A H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. That is a break cannot be assigned to any of the other STS categories.</p>				
256	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H11 Gang Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, in a residential neighborhood of outside delivery points to a gang box. Based on the definition this information is supportive in determining the "load time" classification.</p>				
251	L09 Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at a park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a park and loop route.</p>				
247	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H06 # 1 Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop type delivery, in a residential neighborhood of outside delivery points to a #1 type mailbox. Based on the definition this information is supportive in determining the "load time" classification.</p>				
233	L14 P B L	A02 Sbj Break	WT04 Dismount T00 N/A	S00 N/A H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. That is a "break" cannot be assigned to any of the other STS categories.</p>				

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
228	L08 Vehicle	A00 N/A	WT02 Curb J09 Loading	S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb route.</p>				
225	L08 Vehicle	A00 N/A	WT05 Central J11 Setup	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at a park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined as "preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a central type delivery route.</p>				
217	L12 Point of Deliver	A00 N/A	WT02 Curb J12 Finger @ Deliver	S04 Resident Outside H11 Gang Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver," (fingering of sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a gang box. Based on the definition this information is supportive in determining the "load time" classification</p>				
215	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H02 1 Handed Slot
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop type delivery, in a residential neighborhood of outside delivery points to a one-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification</p>				
215	L08 Vehicle	A00 N/A	WT02 Curb T04 Return to Unit	S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Return to Unit" satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, returning from the portion of a curb route.</p>				
214	L13 On Route	A00 N/A	WT03 Park & Loop T03 Trav B/t w/sort	S04 Resident Outside K09 Walking
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries while sorting or fingering the mail as the activity(Travel B/t w/sort.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walking" provides some additional information about the conditions the carrier faces.</p>				
208	L13 On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K11 Walk Obst
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity(Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Obst" (Walking Obstructed) helps provide some additional information about the conditions the carrier faces.</p>				
203	L12 Point of Deliver	A00 N/A	WT05 Central J08 Del/Coll.	S02 Business Outside H13 Central Outside
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, to a business outside delivery point to central outside type of mailboxes. Based on the definition this information is supportive in determining the "load time" classification</p>				

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	---------------	---------------	--------------------	---------------------------

Code Activities		Code Activity Detail	
203	L08 Vehicle	A00 N/A	
		WT04 Dismount	S04 Resident Outside
		J11 Setup	K01 LLV

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at a park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a dismount type delivery route.

201	L08 Vehicle	A00 N/A	
		WT02 Curb	S04 Resident Outside
		T01 Travel To 1 Divr	K01 LLV

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery on a residential outside portion of a curb route.

196	L08 Vehicle	A00 N/A	
		WT02 Curb	S00 N/A
		T01 Travel To 1 Divr	K01 LLV

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a curb route.

196	L12 Point of Deliver	A00 N/A	
		WT02 Curb	S04 Resident Outside
		J12 Finger @ Deliver	H07 # 1-1/2 Box

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, to a residential outside delivery point to a #1-1/2 size mailbox. Based on the definition this information is supportive in determining the "load time" classification.

180	L14 P B L	A02 Sbj Break	
		WT05 Central	S00 N/A
		T00 N/A	H00 N/A

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. The "break" cannot be assigned to any of the other STS categories.

180	L12 Point of Deliver	A00 N/A	
		WT03 Park & Loop	S01 Business Inside
		J08 Del/Coil.	H10 Drop to Cust

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coil." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop type delivery, to a business inside delivery point and handing or dropping the mail to the customer. Based on the definition this information is supportive in determining the "load time" classification.

173	L12 Point of Deliver	A00 N/A	
		WT05 Central	S04 Resident Outside
		J12 Finger @ Deliver	H13 Central Outside

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, to a residential outside delivery point(s) of a group of central boxes. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	------	----------	---------------	--------------------	---------------------------

				Code Activities	Code Activity Detail
--	--	--	--	-----------------	----------------------

167	L12	Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H09 1 Hand Slam
-----	-----	------------------	---------	--------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, to a residential outside delivery point and is placing the mail into a one-hand slam type of mailbox. Based on the definition this information is supportive in determining the "load time" classification.

166	L08	Vehicle	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H06 #1 Box
-----	-----	---------	---------	----------------------------	------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Vehicle", this is not enough information to determine the category. The activity of "Del/Coll." (Deliver and collect) is consistent with the "load time" definition. The delivery type of "curb" is the final piece needed to verify the carrier is delivering the mail to a curb delivery point. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a residential outside type delivery and placing the mail into a #1 mailbox. Based on the definition this information is supportive in determining the "load time" classification.

146	L13	On Route	A00 N/A	WT03 Park & Loop T02 Travel B/T Dvr.	S01 Business Inside K10 Walk Flat
-----	-----	----------	---------	---	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity (Travel B/T Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.

142	L08	Vehicle	A00 N/A	WT02 Curb T02 Travel B/T Dvr.	S04 Resident Outside K00 Jeep
-----	-----	---------	---------	----------------------------------	----------------------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel B/T Dvr.). The definition is now complete. The carrier is using the jeep to travel between deliveries and on the residential outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification and provides a better definition as the mode of travel.

142	L12	Point of Deliver	A00 N/A	WT04 Dismount F02 Parcel	S04 Resident Outside H10 Drop to Cust
-----	-----	------------------	---------	-----------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity detail of "Drop to Cust" (Drop to customer) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a dismount type delivery, on the residential outside delivery portion of a route. The load time definition is further supported by the "Drop to Cust" activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts".

141	L13	On Route	A00 N/A	WT04 Dismount T02 Travel B/T Dvr.	S02 Business Outside K10 Walk Flat
-----	-----	----------	---------	--------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries as the activity (Travel B/T Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and the activity detail of "Walk Flat" provides some additional information about the conditions the carrier faces.

141	L12	Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S02 Business Outside H10 Drop to Cust
-----	-----	------------------	---------	--------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route.

135	L14	P B L	A01 Sbj Personal	WT02 Curb T00 N/A	S00 N/A H00 N/A
-----	-----	-------	------------------	----------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. That personal break cannot be assigned to any of the other STS categories.

Number Type Status of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery
-------------------------------------	------	----------	------	----------	------	---------------	------	----------

Code Activities

Code Activity Detail

134	L13	On Route	A00	N/A	WT01	Foot	S04	Resident Outside
					T02	Travel B/A Divr.	K10	Walk Flat

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries as the activity (Travel B/A Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

134	L13	On Route	A00	N/A	WT04	Dismount	S01	Business Inside
					T02	Travel B/A Divr.	K10	Walk Flat

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries as the activity (Travel B/A Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

133	L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside
					J08	Del/Coll.	H02	1 Handed Slot

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, in a residential neighborhood of outside delivery points to a one-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification

129	L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside
					J08	Del/Coll.	H12	Central Inside

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, in a business that has an inside central type of delivery points. Based on the definition this information is supportive in determining the "load time" classification

128	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside
					T02	Travel B/A Divr.	K00	Jeep

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/A Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portion of the record provide more supporting information, the carrier was driving a jeep on the residential outside delivery type portion of the route.

124	L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside
					J08	Del/Coll.	H10	Drop to Cust

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

123	L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside
					J08	Del/Coll.	H05	Flat Receptacle

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood of outside delivery points to a flat receptacle. Based on the definition this information is supportive in determining the "load time" classification

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	------	----------	---------------	--------------------	---------------------------

Code Activities	Code Activity Detail
WT03 Park & Loop	S04 Resident Outside
J08 Del/Col.	H10 Drop to Cust

121 **L12** **Point of Deliver** **A00** **N/A**

STS Classification **Load Time** Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

118	L13	On Route	A00	N/A	WT04 Dismount	S04 Resident Outside
					F02 Parcel	K10 Walk Flat

STS Classification **Route/Access (FAT)** Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is delivering a parcel. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

117	L12	Point of Deliver	A00	N/A	WT04 Dismount	S04 Resident Outside
					F01 Accountable	H10 Drop to Cust

STS Classification **Load Time** Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route.

116	L08	Vehicle	A00	N/A	WT04 Dismount	S01 Business Inside
					J11 Setup	K01 LLV

STS Classification **Street Support Time** The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Business Inside" portion of a dismount type delivery route.

112	L12	Point of Deliver	A00	N/A	WT02 Curb	S04 Resident Outside
					F02 Parcel	H10 Drop to Cust

STS Classification **Load Time** Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

106	L08	Vehicle	A00	N/A	WT04 Dismount	S02 Business Outside
					J11 Setup	K01 LLV

STS Classification **Street Support Time** The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Business Outside" portion of a dismount type delivery route.

104	L08	Vehicle	A00	N/A	WT03 Park & Loop	S04 Resident Outside
					T02 Travel B/t Divr.	K00 Jeep

STS Classification **Driving Time** Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter route other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portion of the record provide more supporting information, the carrier was driving a jeep on the residential outside delivery type portion of the route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

99	L08 Vehicle	A00 N/A	WT02 Curb J09 Loading	S04 Resident Outside K01 LLV
----	-------------	---------	--------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb route.

98	L08 Vehicle	A00 N/A	WT05 Central T04 Return to Unit	S04 Resident Outside K01 LLV
----	-------------	---------	------------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a central type route.

88	L14 P B L	A01 Sbj Personal	WT04 Dismount T00 N/A	S00 N/A H00 N/A
----	-----------	------------------	--------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform an activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. That "personal break" cannot be assigned to any of the other STS categories.

87	L14 P B L	A01 Sbj Personal	WT03 Park & Loop T00 N/A	S00 N/A H00 N/A
----	-----------	------------------	-----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform an activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. That "personal break" cannot be assigned to any of the other STS categories.

86	L08 Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Divr	S04 Resident Outside K01 LLV
----	-------------	---------	---------------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a residential outside portion of a dismount route.

85	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	--------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route.

84	L08 Vehicle	A00 N/A	WT04 Dismount T02 Travel Bt Divr.	S00 N/A K01 LLV
----	-------------	---------	--------------------------------------	--------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel Bt Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the route.

84	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H03 2 Handed Slot
----	----------------------	---------	-----------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood & outside delivery points to a two-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

83	L13 On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S02 Business Outside K10 Walk Flat
----	--------------	---------	--	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "park and loop" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

81	L13 On Route	A00 N/A	WT03 Park & Loop T03 Trav B/t w/sort	S04 Resident Outside K11 Walk Obst
----	--------------	---------	---	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park and Loop" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Obst" (walking obstructed) provides some additional supporting information about the conditions the carrier faces.

80	L08 Vehicle	A00 N/A	WT04 Dismount J09 Loading	S00 N/A K01 LLV
----	-------------	---------	------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on dismount portion of a route.

79	L13 On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S04 Resident Outside K10 Walk Flat
----	--------------	---------	--------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

78	L08 Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Divr	S00 N/A K01 LLV
----	-------------	---------	---------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV traveling to the first delivery of a dismount route.

75	L13 On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S03 Resident Inside K10 Walk Flat
----	--------------	---------	--------------------------------------	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Inside" and the activity detail of "Walk Flat" helps provide some additional supporting information about the conditions the carrier faces.

74	L08 Vehicle	A00 N/A	WT05 Central T01 Travel To 1 Divr	S00 N/A K01 LLV
----	-------------	---------	--------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a Central type route.

73	L08 Vehicle	A00 N/A	WT05 Central T02 Travel B/t Divr.	S02 Business Outside K01 LLV
----	-------------	---------	--------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business outside portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

72	L13	On Route	A00 N/A	WT01 Foot T03 Trav B/t w/sort	S04 Resident Outside K10 Walk Flat
----	-----	----------	---------	----------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

71	L08	Vehicle	A00 N/A	WT02 Curb T02 Travel B/t Divr.	S02 Business Outside K01 LLV
----	-----	---------	---------	-----------------------------------	---------------------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel B/t Divr.). The definition is now complete. The carrier is using the LLV to travel between deliveries and on the business outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification and provide a better definition as the mode of travel.

71	L08	Vehicle	A00 N/A	WT03 Park & Loop T01 Travel To 1 Divr	S00 N/A K01 LLV
----	-----	---------	---------	--	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a Park and Loop type route.

71	L08	Vehicle	A00 N/A	WT02 Curb J10 Unloading	S00 N/A K01 LLV
----	-----	---------	---------	----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, subs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on curb of a route.

70	L07	Dock	A00 N/A	WT02 Curb J09 Loading	S00 N/A K01 LLV
----	-----	------	---------	--------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a curb route.

68	L08	Vehicle	A00 N/A	WT04 Dismount J11 Setup	S04 Resident Outside K00 Jeep
----	-----	---------	---------	----------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with "relocating mail at the vehicle". The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Resident Outside" portion of a dismount type delivery route.

67	L08	Vehicle	A00 N/A	WT03 Park & Loop T01 Travel To 1 Divr.	S04 Resident Outside K01 LLV
----	-----	---------	---------	---	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a "Park and Loop" type route.

67	L08	Vehicle	A00 N/A	WT05 Central J11 Setup	S03 Resident Inside K01 LLV
----	-----	---------	---------	---------------------------	--------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

67	L08 Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K00 Jeep
----	-------------	---------	-------------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a Jeep, on the "Resident Outside" portion of a "Park and Loop" route.

66	L08 Vehicle	A00 N/A	WT03 Park & Loop T04 Return to Unit	S04 Resident Outside K01 LLV
----	-------------	---------	--	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a "Park and Loop" type route.

65	L13 On Route	A00 N/A	WT01 Foot T02 Travel B/t Dvr.	S04 Resident Outside K04 Walkg Push Cart
----	--------------	---------	----------------------------------	---

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/t Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walkg Push Cart" (Walking with a pushcart) helps provide some additional supporting information about the conditions the carrier faces.

65	L08 Vehicle	A00 N/A	WT05 Central T04 Return to Unit	S00 N/A K01 LLV
----	-------------	---------	------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV return from a "Central" type route.

65	L09 Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K00 Jeep
----	----------------	---------	-------------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Resident Inside" portion of a "Park & Loop" type delivery.

63	L12 Point of Deliver	A00 N/A	WT02 Curb J12 Finger @ Deliver	S04 Resident Outside H08 #2 Box
----	----------------------	---------	-----------------------------------	------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, to a residential outside delivery point and is placing the mail into a #2 mailbox. Based on the definition this information is supportive in determining the "load time" classification.

62	L08 Vehicle	A00 N/A	WT05 Central J09 Loading	S00 N/A K01 LLV
----	-------------	---------	-----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a central route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	---------------	---------------	--------------------	---------------------------

Code Activities	Code Activity Detail
-----------------	----------------------

12	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Col.	S04 Resident Outside H13 Central Outside
----	----------------------	---------	----------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood of outside delivery types and is loading the mail into a central type box. Based on the definition this information is supportive in determining the "load time" classification.

62	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Col.	S03 Resident Inside H12 Central Inside
----	----------------------	---------	----------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood of inside delivery types and is loading the mail into a central type box. Based on the definition this information is in determining the "load time" classification.

59	L14 P B L	A01 Sbj Personal	WT05 Central T00 N/A	S00 N/A H00 N/A
----	-----------	------------------	-------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform an activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. A "personal break" cannot be assigned to any of the other STS categories.

57	L08 Vehicle	A00 N/A	WT04 Dismount T04 Return to Unit	S04 Resident Outside K01 LLV
----	-------------	---------	-------------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV return from a "Resident Outside" portion of a route.

55	L12 Point of Deliver	A00 N/A	WT02 Curb F01 Accountable	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

55	L08 Vehicle	A00 N/A	WT03 Park & Loop J09 Loading	S00 N/A K01 LLV
----	-------------	---------	---------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a park and loop type route.

55	L12 Point of Deliver	A00 N/A	WT01 Foot J08 Del/Col.	S04 Resident Outside H13 Central Outside
----	----------------------	---------	---------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot type delivery, in a residential neighborhood of outside delivery types and is loading the mail into an outside central type box. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

53	L09	Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K03 Pickup / Van
----	-----	------------	---------	-------------------------------	--

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an "Pickup/Van", on the "Resident Outside" portion of a "Park & Loop" type delivery.

52	L08	Vehicle	A00 N/A	WT02 Curb J10 Unloading	S04 Resident Outside K01 LLV
----	-----	---------	---------	----------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb of a route.

51	L12	Point of Deliver	A00 N/A	WT05 Central J12 Finger @ Deliver	S03 Resident Inside H12 Central Inside
----	-----	------------------	---------	--------------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, to a residential inside delivery point and is placing the mail into a central inside type mailbox. Based on the definition this information is supportive in determining the "load time" classification

51	L08	Vehicle	A00 N/A	WT04 Dismount J09 Loading	S04 Resident Outside K01 LLV
----	-----	---------	---------	------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The other portion of the record provides more details in determining the carrier actions. The carrier was in an LLV at the residential outside portion of a park and loop type route.

50	L08	Vehicle	A00 N/A	WT02 Curb T02 Travel B/t Dvr.	S00 N/A K01 LLV
----	-----	---------	---------	----------------------------------	--------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel B/t Dvr.). The definition is now complete. The carrier is using the LLV to travel between deliveries of a route. These last two pieces of information are supportive in determining the STS CAT classification, and provide a better definition as the mode of travel.

50	L08	Vehicle	A00 N/A	WT05 Central T02 Travel B/t Dvr.	S03 Resident Inside K01 LLV
----	-----	---------	---------	-------------------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential inside portion of a route.

48	L08	Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Dvr.	S02 Business Outside K00 Jeep
----	-----	---------	---------	--------------------------------------	----------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a jeep on the outside business portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	---------------	---------------	--------------------	---------------------------

			Code Activities	Code Activity Detail
--	--	--	-----------------	----------------------

48	L08 Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Dvr	S02 Business Outside K01 LLV
----	-------------	---------	--------------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of an outside business dismount type route.

48	L12 Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S02 Business Outside H06 # 1 Box
----	----------------------	---------	----------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, outside business delivery points with a #1 type mailbox. Based on the definition this information is supportive in determining the "load time" classification

45	L08 Vehicle	A00 N/A	WT03 Park & Loop T02 Travel B/t Dvr.	S01 Business Inside K01 LLV
----	-------------	---------	---	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business inside portion of a route.

44	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H02 1 Handed Slot
----	----------------------	---------	--------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, outside residential delivery points with a one-handed slot type mailbox. Based on the definition this information is supportive in determining the "load time" classification

44	L13 On Route	A00 N/A	WT04 Dismount T05 Walking	S04 Resident Outside K10 Walk Flat
----	--------------	---------	------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "walking flat" provides some additional supporting information about the conditions the carrier faces.

44	L12 Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S03 Resident Inside H12 Central Inside
----	----------------------	---------	----------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to inside residential delivery points with a central type mailbox. Based on the definition this information is supportive in determining the "load time" classification

43	L08 Vehicle	A00 N/A	WT03 Park & Loop T04 Return to Unit	S00 N/A K01 LLV
----	-------------	---------	--	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV returning from a "Park & Loop" portion of a route.

43	L08 Vehicle	A00 N/A	WT04 Dismount T04 Return to Unit	S00 N/A K01 LLV
----	-------------	---------	-------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV returning from a "Dismount" portion of a route.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail
43	L09	Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was on the "Resident Outside" portion of a "Park & Loop" type delivery.</p>					
43	L12	Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S01 Business Inside H10 Drop to Cust
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, on the business inside delivery portion of a route.</p>					
43	L08	Vehicle	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S02 Business Outside K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business outside portion of a route.</p>					
42	L12	Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H09 1 Hand Slam
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, outside residential delivery point, with a one-handed slam type mailboxes. Based on the definition this information is supportive in determining the "load time" classification</p>					
42	L07	Dock	A00 N/A	WT02 Curb J09 Loading	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is loading an LLV at the residential outside portion of a curb type route.</p>					
42	L13	On Route	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S04 Resident Outside K09 Walking
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walking" provides some additional supporting information about the conditions the carrier faces.</p>					
42	L08	Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Divr	S01 Business Inside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a "Business Inside" type route.</p>					
0	L12	Point of Deliver	A00 N/A	WT04 Dismount J12 Finger @ Deliver	S04 Resident Outside H06 #1 Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Dismount type delivery, to a residential outside delivery point and is placing the mail into a #1 type mailbox. Based on the definition this information is supportive to determining the "load</p>					

Number of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery Type	Status
					Code	Activities	Code	Activity	Detail

40	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident	Outside
					T01	Travel To 1 Dvr	K01	LLV	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a central type delivery and the residential outside portion route.

38	L07	Dock	A00	N/A	WT02	Curb	S00	N/A	
					J10	Unloading	K01	LLV	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a curb of a route.

38	L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident	Outside
					J11	Setup	K00	Jeep	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a jeep, on the "Resident Outside" portion of a "Curb" type delivery.

37	L13	On Route	A00	N/A	WT04	Dismount	S04	Resident	Outside
					T02	Travel B/t Dvr.	K01	LLV	

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "on route" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. Another portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The final piece required in this record is the activity detail of "LLV", this allows us to complete the "driving time" definition by putting the carrier in the vehicle. The remaining portions of the record provide more supporting information, residential outside portion of a route.

37	L13	On Route	A00	N/A	WT03	Park & Loop	S04	Resident	Outside
					T02	Travel B/t Dvr.	K01	LLV	

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "on route" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines a second part of the definition. Another portion needed is the delivery type, a "Park & Loop delivery type determines that the record does not belong to a curb delivery. The final piece required in this record is the activity detail of "LLV", this allows us to complete the "driving time" definition by putting the carrier in the vehicle. The remaining portions of the record provide more supporting information, residential outside portion of a route.

36	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business	Inside
					T02	Travel B/t Dvr.	K00	Jeep	

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a jeep on the business inside portion of a route.

36	L12	Point of Deliver	A00	N/A	WT05	Central	S04	Resident	Outside
					F01	Accountable	H10	Drop to Cust	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the residential outside delivery portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

L12	Point of Deliver	A00 N/A	WT05 Central J11 Setup	S04 Resident Outside H13 Central Outside
-----	------------------	---------	---------------------------	---

STS Classification: Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "setup" is the activity of the carrier handling bulk mail pieces. This is the action of the carrier obtaining another armful of mail while standing at a NDCBU "delivery point". He is at the point of delivery getting mail for the next group of residential outside deliveries. The activity detail and resident outside delivery type further supports the NDCBU delivery type.

35	L13 On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
----	--------------	---------	--------------------------------------	---------------------------------

STS Classification: Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "on route" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. Another portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery (CAT). The final piece required in this record is the activity detail of "LLV", this allows us to complete the "driving time" definition by putting the carrier in the vehicle. The remaining portions of the record provide more supporting information, residential outside portion of a route.

35	L17 Gas Station	A00 N/A	WT02 Curb T00 N/A	S00 N/A H00 N/A
----	-----------------	---------	----------------------	--------------------

STS Classification: Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "Gas Station". The carrier is with the vehicle at a gas station. This action occurs in most cases as the carrier is traveling to the first delivery or returning from the last delivery. The is clearly defined by the STS classification of "Street Support" by "activities such as traveling to and from the route"

34	L13 On Route	A00 N/A	WT04 Dismount T05 Walking	S01 Business Inside K10 Walk Flat
----	--------------	---------	------------------------------	--------------------------------------

STS Classification: Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "walk flat" provide additional supporting information about the conditions the carrier faces.

32	L08 Vehicle	A00 N/A	WT04 Dismount J11 Setup	S02 Business Outside K00 Jeep
----	-------------	---------	----------------------------	----------------------------------

STS Classification: Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a jeep, on the "Business Outside" portion of a "Dismount" type delivery.

32	L12 Point of Deliver	A00 N/A	WT05 Central F02 Parcel	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	----------------------------	--

STS Classification: Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the residential outside delivery portion of a route.

32	L08 Vehicle	A00 N/A	WT03 Park & Loop J09 Loading	S04 Resident Outside K01 LLV
----	-------------	---------	---------------------------------	---------------------------------

STS Classification: Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is loading an LLV at the residential outside portion of an park and loop type route.

Number Code Location Code Personal Code Delivery Type Code Delivery Type Status Code Activity Detail

2	L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	F01	Drop to Cust
<p>Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." Also includes incidental time for customer contacts and providing of special services. The data points record the carrier location as "Point of Deliver", this is consistent with the "Load Time" definition. The activity of "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "Load Time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a "Park & Loop" type delivery, on the residential outside delivery portion of a route.</p>										

32	L14	P B L	A02	Sbj Break	WT01	Foot	S00	N/A	T00	N/A
<p>Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. The "break" cannot be assigned to any of the other STS categories.</p>										

31	L13	On Route	A00	N/A	WT04	Dismount	S04	Resident Outside	F01	Accountable
<p>Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is to deliver an accountable. The activity detail of "walk flat" is required to demonstrate that the carrier has not reached the customer. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" helps provide some additional supporting information about delivery.</p>										

31	L12	Point of Deliver	A00	N/A	WT04	Dismount	S04	Resident Outside	J12	Finger @ Deliver
<p>Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "Load Time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "Load Time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Dismount type delivery, to a residential outside delivery point and is placing the mail in a gang box type mailbox. Based on the definition this information is supportive in determining the "Load Time" classification.</p>										

31	L13	On Route	A00	N/A	WT04	Dismount	S04	Resident Outside	T03	Trav Bt w/sort
<p>Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav Bt w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Obs" (walking obstructed) provides some additional supporting information about the conditions the carrier faces.</p>										

30	L13	On Route	A00	N/A	WT04	Dismount	S04	Resident Outside	T02	Trav Bt Divr.
<p>Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav Bt w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" provides some additional supporting information about the conditions the carrier faces.</p>										

30	L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	J12	Finger @ Deliver
<p>Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "Load Time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "Load Time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a "Park & Loop" type delivery, to a residential outside delivery point and is placing the mail in a one-hand slam type mailbox. Based on the definition this information is supportive in determining the "Load Time" classification.</p>										

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
L07	Dock A00	N/A WT04	Code Activities Dismount J09 Loading	Code Activity Detail 30 S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a dismount route.</p>				
29	L08 Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is on the "Resident Outside" portion of a "Park & Loop" type delivery.</p>				
29	L08 Vehicle	A00 N/A	WT05 Central T02 Travel Bt Divr.	S00 N/A K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "Vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel Bt Divr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery (CAT). The remaining portions of the record provide more supporting information, the carrier is in an LLV on the residential outside portion of a route.</p>				
28	L08 Vehicle	A00 N/A	WT03 Park & Loop T02 Travel Bt Divr.	S00 N/A K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "Vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel Bt Divr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery (CAT). The remaining portions of the record provide more supporting information, the carrier is in an LLV on the residential outside portion of a route.</p>				
28	L08 Vehicle	A00 N/A	WT04 Dismount J09 Loading	S01 Business Inside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was loading an LLV on the business inside portion of dismount route.</p>				
28	L07 Dock	A00 N/A	WT02 Curb J10 Unloading	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a curb of a residential outside route.</p>				
28	L13 On Route	A00 N/A	WT05 Central T02 Travel Bt Divr.	S01 Business Inside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries as the activity (Travel Bt Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.</p>				
28	L13 On Route	A00 N/A	WT02 Curb T02 Travel Bt Divr.	S04 Resident Outside K10 Walk Flat
<p>STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is "On Route". This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the activity of traveling between deliveries (Travel Bt Divr.). The definition is now complete. These last two pieces of information are supportive in determining the STS "CAT" classification, and provide a better definition as the mode of travel.</p>				

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

24	L09	Park Point	A00 N/A	WT05 Central J11 Setup	S04 Resident Outside K01 LLV
----	-----	------------	---------	---------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Resident Outside" portion of a "Central" type delivery.

23	L08	Vehicle	A00 N/A	WT05 Central J09 Loading	S04 Resident Outside K01 LLV
----	-----	---------	---------	-----------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was loading an LLV on the residential outside portion of central route.

23	L08	Vehicle	A00 N/A	WT02 Curb J11 Setup	S00 N/A K01 LLV
----	-----	---------	---------	------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the curb portion of the route..

23	L12	Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S02 Business Outside H10 Drop to Cust
----	-----	------------------	---------	-----------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is the activity of the carrier delivering mail. The load time defir is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Park and loop type delivery, on the business outside delivery portion of a route.

22	L08	Vehicle	A00 N/A	WT04 Dismount J09 Loading	S02 Business Outside K01 LLV
----	-----	---------	---------	------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the business outside portion of a dismount route.

22	L08	Vehicle	A00 N/A	WT04 Dismount J10 Unloading	S00 N/A K01 LLV
----	-----	---------	---------	--------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was loading an LLV on a dismount portion of the route.

22	L13	On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S03 Resident Inside K10 Walk Flat
----	-----	----------	---------	--	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Inside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities
				Code Activity Detail

22	L08 Vehicle	A00 N/A	WT05 Central J10 Unloading	S00 N/A K01 LLV
----	-------------	---------	-------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on the portion of a central route.

22	L12 Point of Deliver	A00 N/A	WT05 Central J08 Del/Coll.	S04 Resident Outside H12 Central Inside
----	----------------------	---------	-------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering on a central portion of a route to outside residential delivery points to a central inside type mailbox. Based on the definition this information is supportive in determining the "load time" classification

22	L12 Point of Deliver	A00 N/A	WT03 Park & Loop F02 Parcel	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	--------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Park and Loop type delivery, on the residential outside delivery portion of a route.

22	L08 Vehicle	A00 N/A	WT05 Central J11 Setup	S02 Business Outside K01 LLV
----	-------------	---------	---------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the central portion of a business outside type route..

21	L08 Vehicle	A00 N/A	WT03 Park & Loop J10 Unloading	S00 N/A K01 LLV
----	-------------	---------	-----------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on the portion of a park and loop route.

21	L08 Vehicle	A00 N/A	WT05 Central J08 Del/Coll.	S04 Resident Outside H13 Central Outside
----	-------------	---------	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location is "vehicle", on a central type delivery this is not enough information to determine "load time". The activity of "Del/Coll." (Deliver and collect) is consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to outside residential delivery points to a central outside type mailbox. Some NDCBU units are mounted with the side of the box used to load the mail facing the curb. The carrier is able to service the central delivery points from the vehicle. Based on the definition this information is supportive in determining the "load time" classification

21	L09 Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S01 Business Inside K01 LLV
----	----------------	---------	-------------------------------	--------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Business Inside" portion of a "Park & Loop" type delivery.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	------	----------	---------------	--------------------	---------------------------

				Code Activities	Code Activity Detail
21	L12	Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H01 Illegal Mail Box

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb route delivery, in a residential neighborhood of outside delivery points to a mail box that has been damaged, missing or unusable. Based on the definition this information is supportive in determining the "load time" classification

21	L13	On Route	A00 N/A	WT01 Foot T02 Travel Bt Dvtr.	S01 Business Inside K10 Walk Flat
----	-----	----------	---------	----------------------------------	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel Bt Dvtr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".

20	L08	Vehicle	A00 N/A	WT04 Dismount J12 Finger @ Deliver	S04 Resident Outside K01 LLV
----	-----	---------	---------	---------------------------------------	---------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Vehicle", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" is the activity of the carrier fingering the mail at the point of delivery. This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is in the LLV delivering to a dismount type delivery, on the residential outside delivery portion of a route.

20	L11	Relay Box	A00 N/A	WT01 Foot J11 Setup	S04 Resident Outside H00 N/A
----	-----	-----------	---------	------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Relay Box". More information is needed to determine the category. The term used as "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery" is consistent with "Preparing bulk mail at the vehicle and at relay boxes" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier on a foot route in a residential outside delivery portion of the route.

20	L13	On Route	A00 N/A	WT03 Park & Loop T05 Walking	S04 Resident Outside K10 Walk Flat
----	-----	----------	---------	---------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".

20	L08	Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S02 Business Outside K01 LLV
----	-----	---------	---------	-------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Business Outside" portion of a "Park & Loop" type delivery.

20	L09	Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S02 Business Outside K01 LLV
----	-----	------------	---------	-------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "park point". More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Business Outside" portion of a "Park & Loop" type delivery.

20	L13	On Route	A00 N/A	WT03 Park & Loop T03 Trav Bt w/sort	S01 Business Inside K10 Walk Flat
----	-----	----------	---------	--	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries and sorting or fingering the mail (Trav Bt w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

19	L12	Point of Deliver	A00 N/A	WT03 Park & Loop J12 Finger @ Deliver	S04 Resident Outside H06 # 1 Box
----	-----	------------------	---------	--	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" is the activity of the carrier fingering the mail at the point of delivery. This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a #1 box on a park and loop type delivery, to the residential outside delivery portion of a route.

19	L07	Dock	A00 N/A	WT03 Park & Loop J09 Loading	S04 Resident Outside K01 LLV
----	-----	------	---------	---------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is loading an LLV at the residential outside portion of a park and loop type route.

19	L13	On Route	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S02 Business Outside K09 Walking
----	-----	----------	---------	---------------------------------------	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and the activity detail of "Walking" provides additional supporting information about the choice of "Route/Access (FAT)".

19	L12	Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H10 Drop to Cust
----	-----	------------------	---------	----------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is the activity of the carrier delivering mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Foot type route, on the residential outside delivery portion of a route.

19	L13	On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S04 Resident Outside K09 Walking
----	-----	----------	---------	--------------------------------------	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walking" provides additional supporting information about the choice of "Route/Access (FAT)".

18	L08	Vehicle	A00 N/A	WT01 Foot T04 Return to Unit	S00 N/A K06 Bus - Public
----	-----	---------	---------	---------------------------------	-----------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". In this case the vehicle public transportation, a bus. More information is needed to determine the category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is in a bus returning to the unit from a foot route.

1	L08	Vehicle	C05 Other - Specify	WT05 Central D08 Delay - Specify	S00 N/A K01 LLV
---	-----	---------	---------------------	-------------------------------------	--------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter route other than the curbline portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "C05 Other - Specify" in the "Personal / Administrative" level and the "D08 Delay - Specify" in the activities level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place. The delivery type central determines that the record does not belong to a curb delivery.

1	L08	Vehicle	C05 Other - Specify	WT03 Park & Loop F04 DelaySpckyDetail	S04 Resident Outside G05 Excess Wrds Carr
---	-----	---------	---------------------	--	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "Vehicle", this does not provide enough information to determine the STS category. The activity of "DelaySpckyDetail" (Delay Specify Details) does not provide additional information. The "Personal / Administrative" code of "C05 Other - Specify" does not provide additional information. The activity detail of "G04" "Excess Wrds Carr" (Excess words by the carrier) allows us to determine the second portion of the "load time" definition as "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a "Park & Loop" type delivery, on the residential outside portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail
1	L08 Vehicle	C05 Other - Specify	WT03 Park & Loop T00 N/A	S00 N/A H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The "Personal / Administrative" code "C03 Other - Specify" would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place. The remaining portion of the record provides more details in determining the carriers actions. The carrier was on a "Park & Loop" type delivery portion of a route. The STS category of "Street Support" was assigned.</p>				
1	L12 Point of Deliver	A00 N/A	WT05 Central J12 Finger @ Deliver	S04 Resident Outside H11 Gang Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Central type delivery, to a residential outside delivery point and is placing the mail into a gang box type mailbox. Based on the definition this information is supportive to determining the "load time" classification.</p>				
1	L08 Vehicle	C05 Other - Specify	WT02 Curb T00 N/A	S00 N/A H00 N/A
<p>STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblane portions of routes. Also includes the time spent driving up to curblane stops to load mail into and to collect mail from customer boxes." On these records the carrier is "Vehicle". This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the "Personal / Administrative" code of "C05 Other - Specify" would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place.</p>				
1	L08 Vehicle	C03 Superv. Instruct	WT02 Curb F04 DelaySpckyDetail	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The term used as "DelaySpckyDetail" (delay specify detail) is further defined by the "Personal / Administrative" code "C03 Super. Instruct". The carriers' supervisor is out on the route, at the vehicle giving instructions to the carrier. The remaining portion of the record provides more details in determining the carriers actions. The carrier was on a "Curb" type delivery portion of a residential outside group of deliveries. The STS category of "Street Support" was assigned.</p>				
1	L12 Point of Deliver	C02 Forms	WT05 Central F01 Accountable	S04 Resident Outside H13 Central Outside
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "Point of Deliver" and the "Personal / Administrative" code "C02 Forms" describes the carrier at the point of delivery completing a form (notice of accountable delivery). This notice would satisfy the "providing special services" portion of the definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a central outside box of a central type delivery in a residential neighborhood.</p>				
1	L09 Park Point	A00 N/A	WT02 Curb J09 Loading	S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was at the LLV on a "Curb" type delivery.</p>				
1	L13 On Route	A00 N/A	WT01 Foot T04 Return to Unit	S03 Resident Inside K09 Walking
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is "On Route". More information is needed to determine the category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is walking back to the unit from a foot route of residential inside deliveries.</p>				
1	L12 Point of Deliver	C02 Forms	WT05 Central T00 N/A	S00 N/A H00 N/A
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "Point of Deliver" and the "Personal / Administrative" code "C02 Forms" describes the carrier at the point of delivery completing a form (notice of parcel delivery). This notice would satisfy the "providing special services" portion of the definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a central type delivery.</p>				

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail
1	L08 Vehicle	A00 N/A	WT05 Central D08 Delay - Specify	S03 Resident Inside H00 N/A
<p>STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "D08 Delay - Specify" in the administrative level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place. The delivery type central determines that the record does not belong to a curb delivery.</p>				
1	L13 On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S02 Business Outside K10 Walk Flat
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was walking on flat ground on the business outside portion of a foot type route.</p>				
1	L13 On Route	A00 N/A	WT01 Foot T02 Travel Bt Dvr.	S02 Business Outside K09 Walking
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery points to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". This alone is not sufficient to determine the STS category. The activity of "Travel Bt Dvr." (travel between deliveries) and the delivery type being serviced are "Foot" type deliveries. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and walking provides additional supporting information about the carriers' activities.</p>				
1	L08 Vehicle	A00 N/A	WT05 Central T02 Travel Bt Dvr.	S02 Business Outside K00 Jeep
<p>STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "Travel Bt Dvr." (travel between deliveries) provides a portion of the definition, "driving vehicles on all portions of letter routes". The delivery type central determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The activity detail of "Jeep" and the "Business Outside" delivery status are supportive of the "Driving Time" selection</p>				
1	L13 On Route	A00 N/A	WT01 Foot T04 Return to Unit	S02 Business Outside K09 Walking
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is "On Route". More information is needed to determine the category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is walking back to the unit from a foot route of business outside deliveries.</p>				
1	L08 Vehicle	A00 N/A	WT05 Central J10 Unloading	S02 Business Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a LLV, on the business outside portion of a central of a route.</p>				
1	L13 On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S03 Resident Inside H12 Central Inside
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data point records the carrier location as "On Route", more information is required to classify this record. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to a residential inside delivery point into a central inside type of mailbox. Based on the definition this information is supportive in determining the "load time" classification</p>				
1	L13 On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S02 Business Outside H02 1 Handed Slot
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data point records the carrier location as "On Route", more information is required to classify this record. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to a business outside delivery points into a one-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification</p>				

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

1	L13 On Route	A00 N/A	WT01 Foot T02 Travel B/t Divr.	S03 Resident Inside K10 Walk Flat
---	--------------	---------	-----------------------------------	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". This alone is not sufficient to determine the STS category. The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Inside" and "Walk Flat" provides additional supporting information about the carrier's location.

1	L08 Vehicle	A00 N/A	WT05 Central J11 Setup	S03 Resident Inside H12 Central Inside
---	-------------	---------	---------------------------	---

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined as "preparing mail in bulk at the vehicle" is consistent with "Preparing mail in bulk at the vehicle". The remaining portion of the record provides more details in determining the carriers actions. The carrier was at a central delivery on a central type route.

1	L08 Vehicle	A00 N/A	WT05 Central T00 N/A	S01 Business Inside K01 LLV
---	-------------	---------	-------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "N/A" does not provide any additional information. The delivery type central determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors.

1	L08 Vehicle	A00 N/A	WT05 Central T00 N/A	S01 Business Inside H00 N/A
---	-------------	---------	-------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "N/A" does not provide any additional information. The delivery type central determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors.

1	L13 On Route	A00 N/A	WT01 Foot D08 Delay - Specify	S04 Resident Outside H00 N/A
---	--------------	---------	----------------------------------	---------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". This alone is not sufficient to determine the STS category. The delivery type being serviced is "Foot" and the carrier is being delayed. This delay specify could be the carrier waiting to cross a busy street or waiting at a stoplight. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" provides additional supporting information about the carrier's location.

1	L13 On Route	A00 N/A	WT01 Foot D10 Wait 4 Collectn	S04 Resident Outside H00 N/A
---	--------------	---------	----------------------------------	---------------------------------

STS Classification Collection Box The STS definition of "Collection Time" is "The time spent walking up to and sweeping Express mail and non-express mail collection boxes. The time spent driving vehicles up to the collection stops is included in driving time....". The data point records the carrier location as "On Route". The location does not provide enough information to determine the STS category. The activity of "Wait 4 Collectn" (Wait for Collection) is the carrier waiting at the collection box for the collection time. The allows for the STS category of "Collection Time" to be assigned. The information in the remainder of the record further supports the selection. The carrier is on a "foot" type route in a residential outside group of deliveries.

1	L13 On Route	A00 N/A	WT01 Foot F04 DelaySpofyDetail	S04 Resident Outside G04 Excess Wrds Cust
---	--------------	---------	-----------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "On route", this does not provide enough information to determine the STS category. The activity of "DelaySpofyDetail" (Delay Specify Details) also does not provide additional information. The activity detail of "G04" "Excess Wrds Cust" (Excess words by the customer) allows us to determine the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a foot type delivery, on the residential outside portion of a route.

1	L08 Vehicle	A00 N/A	WT05 Central T04 Return to Unit	S00 N/A K00 Jeep
---	-------------	---------	------------------------------------	---------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the STS category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is in a jeep returning to the unit from a central type delivery.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

1	L13 On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H09 1 Hand Slam
---	--------------	---------	----------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data point records the carrier location as "On Route", more information is required to classify this record. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to a residential outside delivery into a one-hand slam type of mailbox. Based on the definition this information is supportive in determining the "load time" classification

1	L13 On Route	A00 N/A	WT01 Foot T02 Travel B/t Divr.	S03 Resident Inside K09 Walking
---	--------------	---------	-----------------------------------	------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Residential Inside" and the activity detail of "Walking" provides additional supporting information about the conditions the carrier faces

1	L08 Vehicle	A00 N/A	WT05 Central F01 Accountable	S04 Resident Outside K01 LLV
---	-------------	---------	---------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "Accountable" shows the carrier has an accountable to be delivered. The activity detail is required to determine where the carrier is with the accountable. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors.

1	L09 Park Point	A00 N/A	WT03 Park & Loop J09 Loading	S04 Resident Outside K01 LLV
---	----------------	---------	---------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was at the LLV on the "Resident Outside" portion of a "Park & Loop" type delivery.

1	L12 Point of Deliver	C02 Forms	WT05 Central T00 N/A	S04 Resident Outside H00 N/A
---	----------------------	-----------	-------------------------	---------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point record the carrier location as "Point of Deliver", this is consistent with the "at residential and business delivery points" portion of the "load time" definition. The activity and activity detail of N/A does not provide any further details. The personal and administrative code "C02" for "Forms" details the carrier is filling out a form at the point of delivery. The use of the "C02" code is consistent with the "incidental time for customer contacts" portion of the "load time" definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, outside residential delivery point. Based on the definition this information is supportive in determining the "load time" classification

1	L12 Point of Deliver	C05 Other - Specify	WT05 Central F01 Accountable	S01 Business Inside H12 Central Inside
---	----------------------	---------------------	---------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. This satisfies the "load time" definition. The "C05" "Other - Specify" in the administrative level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what administrative function was taking place. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a central type delivery, on the business inside portion of a route.

1	L12 Point of Deliver	C05 Other - Specify	WT05 Central J08 Del/Coll.	S02 Business Outside H13 Central Outside
---	----------------------	---------------------	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services". The data points records the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The "C05" "Other - Specify" in the administrative level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what administrative function was taking place. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the business outside delivery portion of a route to a central outside type mailbox. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

1	L13	On Route	A00 N/A	WT01 Foot D08 Delay - Specify	S00 N/A H00 N/A
---	-----	----------	---------	----------------------------------	--------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and to portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is delayed on route. These portions of the record are consistent with the definition of "FAT". The "Specify" portion of the Activity "Delay - Specify" requires the remaining fields of the record to identify from the observers comment log the specific reason the carrier was delayed.

1	L08	Vehicle	A00 N/A	WT05 Central J10 Unloading	S04 Resident Outside K00 Jeep
---	-----	---------	---------	-------------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a jeep, on the residential outside portion of a central of a route.

1	L13	On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S00 N/A K03 Pickup / Van
---	-----	----------	---------	----------------------------------	-----------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a Pickup/Van of another carrier traveling to the first delivery of a foot type route.

1	L08	Vehicle	A00 N/A	WT05 Central J09 Loading	S04 Resident Outside K00 Jeep
---	-----	---------	---------	-----------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was at the jeep on the "Resident Outside" portion of a "Central" type delivery.

1	L13	On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S02 Business Outside H10 Drop to Cust
---	-----	----------	---------	----------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carriers' location as "On route" this does not provide enough information to classify the record. The activity of "Del/Coll." is the activity of the carrier delivering or collecting mail. The "load time" definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering on a foot type route, on the business outside delivery portion of a route.

1	L13	On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S00 N/A K09 Walking
---	-----	----------	---------	----------------------------------	------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was walking to the first delivery of a foot type route.

1	L12	Point of Deliver	C02 Forms	WT05 Central J08 Del/Coll.	S02 Business Outside H13 Central Outside
---	-----	------------------	-----------	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central route type delivery, in a business outside delivery points to an outside central type of mailbox. Based on the definition this information is supportive in determining the "load time" classification

1	L13	On Route	A00 N/A	WT01 Foot F01 Accountable	S01 Business Inside K10 Walk Flat
---	-----	----------	---------	------------------------------	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The activity code of "F01" "Accountable" shows the carrier is delivering an accountable piece of mail. The delivery type of "Foot" is consistent with the "FAT" category. The activity detail is required to determine the location of the carrier. The "K10" "Walk Flat" shows the carrier is walking and has not made contact with the customer. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" provides additional information about the carriers location.

1 CHAIRMAN GLEIMAN: Is there any Additional
2 Designated Written Cross Examination for this witness? Mr.
3 McLaughlin?

4 MR. McLAUGHLIN: Mr. Chairman, we do have some
5 additional designations.

6 CHAIRMAN GLEIMAN: Please proceed.

7 MR. McLAUGHLIN: I was expecting we'd have many,
8 many more, but for the reasons we discussed earlier, there
9 have been very few responses received in the last week.

10 I would like to hand the witness the following
11 interrogatories: Advo/USPS-T-13-51, 101, 103; 105 through
12 109; MPA/USPS-T-13-7 and 56.

13 CROSS EXAMINATION

14 BY MR. McLAUGHLIN:

15 Q Were those prepared by you?

16 A Just a minute, please, while I skim these.

17 [Pause.]

18 Yes, those were either prepared by me or under my
19 supervision.

20 Q And are they true and correct?

21 A Yes.

22 MR. McLAUGHLIN: Mr. Chairman, I move that they be
23 received into evidence and transcribed.

24 CHAIRMAN GLEIMAN: If I could impose upon you to
25 provide two copies to the Reporter, I'll direct that the

1 material be received into evidence and transcribed into the
2 record.

3 [Additional Designated Written
4 Cross Examination of Lloyd Raymond,
5 Advo/USPS-T-13-51, 101, 103; 105
6 through 109; and MPA/USPS-T-13-7
7 and 56, was received into evidence
8 and transcribed into the record.]

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

ADVO/USPS-T13-51. Please refer to your response to MPA/USPS-T13-51 concerning a definition of the term "outlier."

- (a) Provide any decision rules you had concerning the identification of outliers.**
- (b) Identify all examples of outliers of which you are aware.**
- (c) You state that a lunch break scan at the end of the day would be considered an outlier. What were the standard times for lunch breaks? For example, if there is no break in the middle of the day, would that be considered an outlier? Please explain.**
- (d) You state that six vehicle inspection scans in a row would be an outlier. Please provide some examples of observations which indicate a vehicle inspection is occurring.**
- (e) Is vehicle inspection considered to be an "out-of-office" activity? Please explain.**

RESPONSE:

- (a) There were no formal decision rules concerning the identification of outliers. The data coordinators used their judgement and the field generated-marked-up sets to make corrections to the database. They would then run reports and scan for values that appeared to them as a point to be discussed with the data collectors. Outliers were not purged from the database; they were modified to an agreed-on change based on discussions between the data coordinators and data collectors.**
- (b) Please see response to ADVO/USPS-T13-39.**
- (c) Please see response to ADVO/USPS-T13-67.**
- (d-e) Vehicle inspection was an "in-office" activity and was therefore not part of the LR-I-163. The following sheets contain examples of sets of Vehicle Inspection scans, identified by Location "Vehicle."**

Data Collected - Work Sampling

04/28/2000 8:17:13 PM

5/12/199

OBS37

CY48

Route: 0148

Job Class	Location		Personal		Delivery Type and Status			Activities		
Regular Carrier	N/A		N/A		N/A	N/A	N/A	N/A		
Regular Carrier	N/A		N/A		N/A	N/A	N/A	N/A		
Regular Carrier	Vehicle	8:01 AM	Vehicle Inspect	8:02 AM	Inside Work	N/A	8:02 AM	N/A	N/A	8:02 AM
Regular Carrier	Work Station	8:06 AM	N/A	8:06 AM	Inside Work	N/A	8:06 AM	Letters	Ltr Srt Empty	8:06 AM
Regular Carrier	Work Station	8:12 AM	N/A	8:12 AM	Inside Work	N/A	8:12 AM	Letters	Ltr Srt Empty	8:12 AM
Regular Carrier	Work Station	8:18 AM	N/A	8:18 AM	Inside Work	N/A	8:18 AM	Letters	Ltr Srt Empty	8:18 AM
Regular Carrier	Work Station	8:24 AM	N/A	8:24 AM	Inside Work	N/A	8:24 AM	Letters	Ltr Srt Partial	8:24 AM
Regular Carrier	Work Station	8:30 AM	N/A	8:30 AM	Inside Work	N/A	8:30 AM	Letters	Ltr Srt Partial	8:30 AM
Regular Carrier	Work Station	8:36 AM	N/A	8:36 AM	Inside Work	N/A	8:36 AM	Flats	Flt Srt Vert Em	8:36 AM
Regular Carrier	Work Station	8:42 AM	N/A	8:42 AM	Inside Work	N/A	8:42 AM	Flats	Flt Srt Vert Em	8:42 AM
Regular Carrier	Work Station	8:48 AM	N/A	8:48 AM	Inside Work	N/A	8:48 AM	Flats	Flt Srt Vert Em	8:48 AM
Regular Carrier	N/A	8:48 AM	N/A	8:48 AM	N/A	N/A	8:48 AM	N/A	N/A	8:48 AM
Regular Carrier	Work Station	8:54 AM	N/A	8:54 AM	Inside Work	N/A	8:54 AM	Flats	Flt Srt Vert Pa	8:54 AM
Regular Carrier	Work Station	9:00 AM	N/A	9:00 AM	Inside Work	N/A	9:00 AM	Flats	Flt Srt Vert Pa	9:00 AM
Regular Carrier	Work Station	9:06 AM	N/A	9:06 AM	Inside Work	N/A	9:06 AM	Flats	Flt Srt Vert Me	9:06 AM

Data Collected - Work Sampling

04/26/2000 6:15:51 PM

9/10/199

OB539

CY47

Route: 1507

Job Class	Location		Personal		Delivery Type and Status			Activities		
Regular Carrier	N/A		N/A		N/A	N/A	N/A	N/A		
Regular Carrier	Vehicle	7:06 AM	Vehicle Inspect	7:07 AM	Inside Work	N/A	7:07 AM	N/A	N/A	7:07 AM
Regular Carrier	Work Station	7:12 AM	N/A	7:13 AM	Inside Work	N/A	7:13 AM	Letters	Mat'l Handling	7:13 AM
Regular Carrier	Work Station	7:19 AM	Superv. Instruct	7:19 AM	Inside Work	N/A	7:19 AM	N/A	N/A	7:19 AM
Regular Carrier	Work Station	7:25 AM	N/A	7:25 AM	Inside Work	N/A	7:25 AM	Letters	Ltr Srt Empty	7:25 AM
Regular Carrier	Work Station	7:31 AM	N/A	7:31 AM	Inside Work	N/A	7:31 AM	Letters	Ltr Srt Partial	7:31 AM
Regular Carrier	Work Station	7:37 AM	N/A	7:37 AM	Inside Work	N/A	7:37 AM	Letters	Ltr Srt Partial	7:38 AM
Regular Carrier	N/A	7:43 AM	N/A	7:43 AM	N/A	N/A	7:43 AM	N/A	N/A	7:43 AM
Regular Carrier	Work Station	7:43 AM	N/A	7:43 AM	Inside Work	N/A	7:43 AM	Letters	Ltr Srt Median	7:43 AM
Regular Carrier	Work Station	7:49 AM	N/A	7:49 AM	Inside Work	N/A	7:49 AM	Letters	Ltr Srt Partial	7:49 AM
Regular Carrier	Work Station	7:55 AM	N/A	7:55 AM	Inside Work	N/A	7:55 AM	Letters	Ltr Srt Partial	7:55 AM
Regular Carrier	Work Station	8:01 AM	N/A	8:01 AM	Inside Work	N/A	8:01 AM	Letters	Ltr Srt Partial	8:01 AM
Regular Carrier	Work Station	8:07 AM	N/A	8:07 AM	Inside Work	N/A	8:07 AM	Flats	Flt Srt Vert Em	8:07 AM
Regular Carrier	Work Station	8:13 AM	N/A	8:13 AM	Inside Work	N/A	8:13 AM	Folded Flats	Flt Srt Vert Fu	8:13 AM
Regular Carrier	Work Station	8:19 AM	N/A	8:19 AM	Inside Work	N/A	8:19 AM	Flats	Flt Srt Vert Me	8:19 AM

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

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

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**

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

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			
	Counts for Mail Type	Scan the item(s) that were counted during the task timing	
	Counts for Delivery Type	Scan each item as needed for quantity input	PCxx
	Counts for Transportation Type	Scan each item as needed for quantity input	DCxx
	Quantity	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 Location - Outside	Scan inside location where subject is when 6 min. timer sounds Scan outside location where subject is when 6 min. timer sounds	Lxx
11 Work Sampling			
11.1	Personal Non-Job Admin Job Admin	Scan specific subject personal or administrative activity if required when alarm sounds	Axx Bxx 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 Customer Inside Work Outside Work Delays	Scan specific subject travel activity when alarm sounds Scan specific subject activity with the customer when alarm sounds Scan specific subject inside work activity when alarm sounds Scan specific subject outside work activity when alarm sounds Scan specific subject delay when alarm sounds	Txx Fxx Jxx Uxx Dxx
11.4.1	Activity Detail Travel Details Customer Details Inside Work Details Outside Work Details Delay Details	Scan specific detail of the travel activity (if required) when alarm sounds Scan specific detail of the customer activity (if required) when alarm sounds Scan specific detail of the inside activity (if required) when alarm sounds Scan specific detail of the outside activity (if required) when alarm sounds Scan specific detail of the delay (if required) when alarm sounds	Kxx Gxx Exx Hxx 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		
4	Route Number	Entry		Keyed entry of 4 digits
Subject Job Classification				
4	Classification	JC01	Regular Carrier	
		JC02	Utility Carrier	
		JC03	PTE Part Time	
		JC04	Temporary Employee	
		JC05	Casual	
Subject Present				
5	Subject Present	SP01	Subject is Present	Scan when subject is first sighted, ontime or late
		SP02	End of Subject Study	
Mileage				
6	Mileage	M01	Mileage - N/A	Total mileage traveled
		M02	Enter Odometer Numbers	Enter start then finish at end of the day

8 Time Study			
8.1	Event Number	0000 0001	Not Applicable Events Events 0001 to 9999
8.2	Event Status	STT FIN INT RES NAA	Start Finish Interrupted Resumed Not Applicable Starts task timing function Finish task timing Interrupted task timing Resume task timing
8.3	Task Type	TT00	N/A Not Applicable
	Mail Type	PT01 PT02 PT03 PT04 PT05 PT06 PT07 PT08 PT09 PT10 PT11	AM Letters AM Flats AM Accountable AM Parcels AM Mix AM Admin PM Letters PM Flats PM Accountable PM Mix PM Admin Inside letters handled in the AM Inside flat mail handled in the AM Inside accountables handled in the AM Inside parcels handled in the AM Inside Mixed Mail handled in the AM AM Administrative functions and Inside and Outside Clock Inside letters handled in the PM Inside flat mail handled in the PM Inside accountables handled in the PM Inside Mixed Mail handled in the PM PM Administrative functions and Inside Clock at end of day
	Delivery Type		
	Reference counts to Business and Residential Deliveries	DT12 DT13 DT14 DT15 DT16 DT17 DT18	Curb Foot/Walking Dismount Central / Inside Park and Loop Central / Outside VIM Room Curbside delivery Walking route delivery Dismount delivery Apartment type delivery inside Park and Loop delivery Condominium delivery outside Vertical Improved Mail delivery
	Transportation Type	TT19 TT20 TT21 TT22 TT23 TT24 TT25 TT26 TT27 TT28 TT29	Jeep LLV 1 or 2 Ton Truck Pickup Truck Walking - Push Cart Bike Bus - Public Automobile Elevator - Passenger Walking Train - Public

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

Event Quantities			
Counts for Mail Type		PC00	Not Applicable
		PC01	Accountables
		PC02	Parcels
		PC03	Letters
		PC04	Flats
		PC05	Withdrawals
		PC06	Forms
		PC07	Folded Flats
		PC08	Delivery Points
		PC09	COA's
		PC10	Bends at Case
		PC11	Feet of mail
		PC12	DPS
		PC13	UBBM Quantity
		PC14	Pulldown Bundles
		PC15	Paces Vehicle Inspection
		PC16	Missorts/CMUs
		PC17	Sequenced Flats
Counts for Delivery Type			
		DC01	Paces Inside
		DC02	Paces Outside
		DC03	Paces Outside Obstructed
		DC04	Bends - Weighted
		DC05	Bends - Unweighted
		DC06	Doors / Gates
		DC07	Forms
		DC08	Residential delivery points
		DC09	Bundles
		DC10	Customer Interaction
		DC11	Pickups
		DC12	Dismounts
		DC13	Illegal Boxes
		DC14	Business delivery points
		DC15	Missed delivery points
		DC16	Screen / Storm Doors
		DC17	Trays/Tubs unloaded
Counts for Transportation Type			
		TC01	Miles
		TC02	Park Points
Quantity			

New level - Loop as often as needed

Use this code to bypass to Work sampling

Number of accountables received

Number of parcels received

Number of letters cased or withdrawn

Number of flats cased or withdrawn

Number of passes made at withdrawal case

Number of forms filled out in timing block

Number of Flats folded and sorted

Number of slots in case operation

Number of Change of Address made

Number of Bends made by carrier in timing block

Number of trays placed in hamper after pulldown

Number of trays of DPS Mail

Number of pcs of mail to UBBM throw to Tub

Number of bundles generated at pulldown

Number of Paces used in inspecting Vehicle

Number of pieces of mail the carrier places on the ledge while sorting - to be handled later

Number of Flats in delivery sequence

Number of paces in basic delivery timing block inside a building

Number of paces in basic delivery timing block outside on flat ground

Number of paces in basic delivery timing block outside with obstructions or stairs

Number of bends made in delivery timing block w/ Loaded Satchel

Number of bends made in delivery timing block w/o Satchel

Number of doors opened in delivery timing block

Number of forms filled out in delivery timing block

Number of residential delivery points in delivery timing block

Number of bundles carrier method used

Number of customer interactions in delivery timing block

Number of collections made in delivery timing block

Number of dismounts required in delivery timing block

Number of illegal boxes in delivery timing block

Number of business delivery points in delivery timing block

Number of delivery points skipped in delivery timing block

Number of Screen or Storm doors opened in delivery timing block

Number of trays and tubs unloaded at the end of day

Number of miles between park points

Number of park points in Park & Loop route

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
		J09	Loading
		J10	Unloading
		J11	Setup
		D01	No Access to Box
		D02	Vehicle Breakdown
		D03	Mail Processing
		D04	Weather
		D05	Traffic/Detour
		D06	No Work
		D07	Other

Provide details for Box type next level 11.4.1
Vehicle or Satchel in the AM
Vehicle at the end of the day
Rearranging vehicle or satchel during the day

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 Occurrences	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 snow at 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	
R22	Distance to clock	Paces to clock from carrier case
R23	Distance to Accountable	
R24	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

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

and each piece of data has its 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.

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

(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.

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

(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.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/27**

MPA/USPS-T13-7. Please provide a copy of the methods analysis and time values for standards developed during the study described in your testimony at page 5, lines 3-5, and indicate which method(s) was/were used to determine them.

RESPONSE:

Presiding Officer's Ruling NO. R2000-1/27 requires the Postal Service to indicate which method(s) was/were used to determine the final (or most recent) time standards and engineered methods that were developed from the ES project. This information has already been provided in the responses to interrogatories NAA/USPS-T13-3, 4.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/27**

MPA/USPS-T13-56. As to each route/day, please provide the total time and total tallies collected.

RESPONSE:

The following attachment provides the total time recorded which may or may not match the carrier's compensated work hours. The total tallies include both inside/office and outside/street tallies.

Attachment to in Response to MPA/USPS-T13-56

Date	Case	Enrollees	Trainers	Start Time	End Time	End Time
10/15/96	CY07	8035	122	7:12:55	17:47:11	10:34:16
10/15/96	CY08	1638	90	7:36:58	16:29:40	8:52:42
10/15/96	CY11	4712	108	11:03:05	21:05:11	10:02:06
10/16/96	CY02	1595	119	6:32:09	16:53:43	10:21:34
10/16/96	CY07	8045	84	8:05:34	15:50:01	7:44:27
10/16/96	CY08	1632	83	7:17:55	15:18:37	8:00:42
10/16/96	CY11	4811	102	7:35:53	17:15:59	9:40:06
10/17/96	CY02	1569	92	7:05:36	15:44:58	8:39:22
10/17/96	CY07	8028	110	7:32:19	18:20:39	10:48:20
10/17/96	CY08	1620	80	7:32:52	15:57:04	8:24:12
10/17/96	CY11	4732	84	8:02:16	16:10:54	8:08:38
10/21/96	CY03	4126	103	7:36:57	17:11:08	9:34:11
10/21/96	CY05	2835	86	6:31:41	15:21:02	8:49:21
10/22/96	CY03	4114	92	7:01:47	15:28:33	8:26:46
10/22/96	CY05	2822	81	7:36:28	15:19:37	7:43:09
10/22/96	CY10	2160	103	7:31:01	17:46:06	10:15:05
10/22/96	CY11	4731	84	8:07:54	16:10:37	8:02:43
10/23/96	CY03	4106	108	7:34:02	17:31:37	9:57:35
10/23/96	CY05	2806	92	7:08:15	15:53:16	8:45:01
10/23/96	CY10	2167	85	7:37:11	16:14:23	8:37:12
10/23/96	CY11	4910	89	8:04:31	16:31:59	8:27:28
10/24/96	CY03	4104	94	7:39:21	16:12:27	8:33:06
10/24/96	CY05	2814	91	7:10:16	15:37:11	8:26:55
10/24/96	CY10	2169	79	7:01:08	15:12:47	8:11:39
10/24/96	CY11	4725	92	8:01:39	16:30:54	8:29:15
10/25/96	CY10	2155	88	7:29:12	17:16:31	9:47:19
10/25/96	CY11	4708	89	8:04:38	16:25:48	8:21:10
10/26/96	CY11	4817	90	8:02:49	16:29:58	8:27:09
10/28/96	CY06	9302	84	7:30:35	15:17:50	7:47:15
10/28/96	CY09	2469	93	7:29:58	16:47:28	9:17:30
10/28/96	CY11	4921	86	9:05:42	17:39:15	8:33:33
10/29/96	CY09	2451	107	7:09:10	17:36:15	10:27:05
10/29/96	CY11	4814	100	8:08:31	17:24:00	9:15:29
10/30/96	CY09	2465	94	7:07:24	16:24:11	9:16:47
10/30/96	CY11	4719	93	8:05:24	17:14:30	9:09:06
11/01/96	CY11	4726	93	8:04:09	17:13:20	9:09:11
11/05/96	CY17	1928	90	7:36:22	16:20:35	8:44:13
11/06/96	CY14	3703	73	7:11:42	14:38:08	7:26:26
11/06/96	CY17	1908	88	7:33:50	15:28:04	7:54:14
11/07/96	CY17	1926	77	7:33:48	14:56:34	7:22:46
11/08/96	CY02	1558	114	7:30:50	17:34:19	10:03:29
11/09/96	CY02	1560	66	7:05:29	12:43:56	5:38:27
11/12/96	CY14	3705	96	6:00:14	15:21:46	9:21:32
11/13/96	CY16	1233	84	7:03:30	15:26:47	8:23:17
11/14/96	CY16	1237	83	6:54:08	14:51:22	7:57:14
11/14/96	CY18	2934	91	7:02:34	15:29:25	8:26:51
11/15/96	CY03	4111	94	7:52:23	16:37:06	8:44:43
11/18/96	CY16	1252	83	7:11:13	15:14:13	8:03:00
11/18/96	CY19	4846	95	7:32:29	16:20:59	8:48:30
11/19/96	CY15	1061	90	6:53:23	15:57:11	9:03:48
11/19/96	CY19	4880	89	7:05:18	15:31:46	8:26:28
11/20/96	CY15	1024	104	6:43:01	16:34:26	9:51:25
12/03/96	CY34	3125	94	7:28:32	16:13:02	8:44:30
12/04/96	CY34	3104	84	7:59:20	16:20:21	8:21:01
12/04/96	CY34	3104	84	7:59:20	16:20:21	8:21:01

Attachment to in Response to MPA/USPS-T13-56

12/05/96	CY34	3141	104	7:29:29	17:26:54	9:57:25
12/05/96	CY36	0480	88	7:03:06	16:18:08	9:15:02
12/06/96	CY36	0310	84	7:02:11	15:42:09	8:39:58
12/09/96	CY33	1842	107	7:05:59	16:57:01	9:51:02
12/09/96	CY35	6742	104	7:18:27	17:52:27	10:34:00
12/09/96	CY37	0211	103	6:34:10	16:06:35	9:32:25
12/10/96	CY33	1612	100	6:59:02	16:06:51	9:07:49
12/10/96	CY35	6703	94	7:18:05	16:33:28	9:15:23
12/10/96	CY37	0321	79	6:32:04	14:30:52	7:58:48
12/11/96	CY33	1618	90	8:02:35	16:43:15	8:40:40
12/11/96	CY35	6739	86	7:09:00	15:36:00	8:27:00
12/11/96	CY37	0134	88	6:34:18	14:24:55	7:50:37
12/13/96	CY38	8008	103	7:02:10	17:25:59	10:23:49
12/13/96	CY40	8404	90	8:03:00	17:29:50	9:26:50
12/14/96	CY39	0908	78	7:02:36	14:39:51	7:37:15
12/14/96	CY40	8405	80	8:07:13	16:58:44	8:51:31
12/16/96	CY38	8229	93	7:34:19	17:20:03	9:45:44
12/16/96	CY39	1205	97	6:45:42	16:31:03	9:45:21
12/16/96	CY40	8408	87	7:40:17	16:13:23	8:33:06
12/17/96	CY38	8044	73	7:29:09	14:53:57	7:24:48
12/17/96	CY39	1206	93	7:07:02	16:16:28	9:09:26
01/06/97	CY26	0818	95	7:10:37	16:25:30	9:14:53
01/06/97	CY29	3549	95	8:18:52	17:40:57	9:22:05
01/07/97	CY26	0828	99	7:04:09	16:54:33	9:50:24
01/07/97	CY29	4506	86	7:35:17	16:25:36	8:50:19
01/08/97	CY26	0849	85	7:08:51	15:41:41	8:32:50
01/08/97	CY29	3656	85	8:01:56	16:26:29	8:24:33
01/09/97	CY27	1428	95	7:03:14	16:18:18	9:15:04
01/09/97	CY29	3618	89	6:56:34	15:27:28	8:30:54
01/10/97	CY27	1430	83	7:06:31	15:09:23	8:02:52
01/10/97	CY30	3655	79	8:19:14	16:05:40	7:46:26
01/11/97	CY27	1435	90	7:06:13	15:45:03	8:38:50
01/11/97	CY29	4310	96	7:35:31	16:42:52	9:07:21
01/13/97	CY23	0603	77	7:28:32	15:54:46	8:26:14
01/13/97	CY28	2374	90	6:51:33	15:54:19	9:02:46
01/13/97	CY29	4515	98	7:38:54	17:46:36	10:07:42
01/14/97	CY23	0623	91	7:31:35	15:51:38	8:20:03
01/14/97	CY28	2385	96	6:32:30	15:59:44	9:27:14
01/15/97	CY23	0607	75	7:44:15	15:40:17	7:56:02
01/15/97	CY28	2375	66	6:08:58	13:23:27	7:14:29
01/15/97	CY30	4442	68	7:35:08	14:18:48	6:43:40
02/04/97	CY18	2947	87	7:31:24	15:58:22	8:26:58
02/05/97	CY14	3707	72	7:04:56	15:26:00	8:21:04
02/05/97	CY18	2912	87	7:33:04	16:00:06	8:27:02
02/05/97	CY20	5546	81	7:04:33	14:35:23	7:30:50
02/06/97	CY14	3706	72	7:02:23	14:18:39	7:16:16
02/06/97	CY20	5566	92	7:07:16	16:03:39	8:56:23
02/11/97	CY41	0610	88	6:16:48	14:31:43	8:14:55
02/12/97	CY41	0628	87	6:04:27	14:37:01	8:32:34
02/13/97	CY41	0626	94	6:07:59	15:35:38	9:27:39
02/13/97	CY42	1946	80	7:18:44	15:09:33	7:50:49
05/05/97	CY02	1579	99	7:10:57	15:24:56	8:13:59
05/05/97	CY48	0164	113	7:49:40	18:05:17	10:15:37
05/05/97	CY49	0101	94	7:05:08	18:25:24	11:20:16
05/06/97	CY02	1579	96	7:24:49	15:51:07	8:26:18
05/06/97	CY46	1122	92	7:06:08	17:05:42	10:10:01

Attachment to in Response to MPA/USPS-T13-56

05/06/97	CY47	1411	104	7:33:17	17:29:43	9:56:26
05/06/97	CY48	0164	87	8:28:55	16:42:54	8:13:59
05/06/97	CY49	0101	94	7:09:52	16:47:20	9:37:28
05/07/97	CY02	1579	113	7:33:29	16:22:06	8:48:37
05/07/97	CY46	1133	82	7:01:28	15:58:46	8:57:18
05/07/97	CY47	1411	97	7:17:57	16:57:29	9:39:32
05/07/97	CY48	0164	83	7:55:13	15:33:34	7:38:21
05/08/97	CY46	1133	101	7:06:54	16:34:40	9:27:46
05/08/97	CY47	1411	85	7:15:19	14:55:41	7:40:22
05/08/97	CY48	0105	71	7:20:39	15:11:05	7:50:26
05/08/97	CY49	0711	92	7:06:42	17:20:32	10:13:50
05/08/97	CY50	8717	98	6:55:12	16:05:28	9:10:16
05/09/97	CY02	1579	88	7:35:17	15:24:06	7:48:49
05/09/97	CY46	1133	88	7:11:21	16:32:58	9:21:37
05/09/97	CY47	1411	96	7:16:23	16:57:07	9:40:44
05/09/97	CY48	0105	87	7:32:54	16:18:49	8:45:55
05/09/97	CY49	0711	86	7:05:12	16:06:52	9:01:40
05/09/97	CY50	8717	99	7:05:51	16:28:25	9:22:34
05/10/97	CY02	1579	114	6:35:18	16:44:38	10:09:20
05/10/97	CY47	1411	93	7:27:39	17:47:35	10:19:56
05/10/97	CY48	0105	65	7:33:19	14:58:54	7:25:35
05/10/97	CY49	0711	106	7:14:17	17:42:18	10:28:01
05/10/97	CY50	8717	95	7:03:56	16:18:54	9:14:58
05/12/97	CY02	1579	113	6:36:32	17:35:33	10:59:01
05/12/97	CY48	0146	78	8:01:57	15:20:54	7:18:57
05/12/97	CY49	0716	103	7:03:47	17:20:17	10:16:30
05/12/97	CY50	8717	101	7:02:42	16:41:32	9:38:50
05/13/97	CY02	1579	109	7:06:22	17:07:23	10:01:01
05/13/97	CY46	1133	80	7:08:15	16:23:44	9:15:29
05/13/97	CY48	0146	83	8:00:24	15:09:02	7:08:38
05/13/97	CY49	0716	93	7:09:26	15:55:00	8:45:34
05/13/97	CY50	8717	103	6:44:06	16:48:03	10:03:57
05/14/97	CY02	1579	91	7:32:07	15:46:29	8:14:22
05/14/97	CY46	1133	89	7:01:50	15:12:54	8:11:04
05/14/97	CY48	0146	78	8:02:11	14:59:11	6:57:00
05/14/97	CY49	0716	95	7:02:19	15:57:01	8:54:42
05/14/97	CY50	8717	103	7:05:04	16:41:57	9:36:53
05/15/97	CY02	1579	107	7:25:47	16:32:47	9:07:00
05/15/97	CY48	0337	75	7:35:25	15:49:54	8:14:29
05/15/97	CY49	0102	92	7:04:32	16:29:04	9:24:32
05/15/97	CY50	8717	104	7:04:23	17:25:17	10:20:54
05/16/97	CY02	1579	96	7:32:24	16:06:56	8:34:32
05/16/97	CY46	1133	78	7:02:02	16:01:56	8:59:54
05/16/97	CY47	1411	91	7:18:07	16:24:50	9:06:43
05/16/97	CY48	0337	81	7:34:32	15:07:27	7:32:55
05/16/97	CY49	0102	93	7:08:06	15:30:19	8:22:13
05/16/97	CY50	8717	99	7:04:27	16:12:00	9:07:33
05/17/97	CY02	1579	87	7:33:15	15:08:18	7:35:03
05/17/97	CY47	1411	108	6:48:38	17:38:39	10:50:01
05/17/97	CY49	0102	61	6:51:51	14:37:14	7:45:23
05/17/97	CY50	8717	90	7:06:48	15:29:59	8:23:11
05/19/97	CY02	1579	100	7:07:07	16:08:05	9:00:58
05/19/97	CY46	1133	102	6:21:33	16:53:50	10:32:17
05/19/97	CY47	1411	106	7:16:02	17:22:05	10:06:03
05/19/97	CY51	6156	93	8:42:38	17:33:41	8:51:03
05/19/97	CY54	0411	93	7:06:51	17:09:10	10:02:10

Attachment to in Response to MPA/USPS-T13-56

05/20/97	CY02	1579	105	6:35:16	16:30:47	9:55:31
05/20/97	CY46	1133	91	7:03:11	16:30:54	9:27:43
05/20/97	CY51	6156	53	7:54:15	13:11:22	5:17:07
05/20/97	CY54	0411	93	7:04:27	15:57:19	8:52:52
05/21/97	CY02	1579	103	6:38:00	15:48:32	9:10:32
05/21/97	CY46	1133	89	7:04:19	16:40:55	9:36:36
05/21/97	CY51	6156	103	7:44:58	17:30:21	9:45:23
05/21/97	CY54	0411	97	7:03:00	16:37:21	9:34:21
05/22/97	CY46	1133	77	7:05:34	15:19:42	8:14:08
05/22/97	CY47	1411	86	7:23:45	15:44:08	8:20:23
05/22/97	CY50	8717	96	6:52:33	15:54:10	9:01:37
05/22/97	CY51	6157	60	7:12:22	12:44:15	5:31:53
05/22/97	CY54	0424	77	6:44:29	15:36:27	8:51:58
05/23/97	CY02	1579	72	6:33:17	12:47:12	6:13:55
05/23/97	CY46	1133	71	7:06:50	15:23:01	8:16:11
05/23/97	CY50	8717	95	6:54:25	16:24:30	9:30:05
05/23/97	CY51	6157	81	7:25:06	15:15:47	7:50:41
05/23/97	CY54	0424	78	6:25:44	16:08:21	9:42:37
05/24/97	CY02	1579	99	7:06:38	15:35:12	8:28:34
05/24/97	CY46	1133	81	7:03:50	15:57:06	8:53:16
05/24/97	CY50	8717	93	6:47:43	15:02:10	8:14:27
05/24/97	CY54	0424	61	6:19:57	14:06:08	7:46:11
05/27/97	CY02	1579	109	6:35:56	16:15:07	9:39:11
05/27/97	CY46	1133	109	6:12:45	17:01:00	10:48:15
05/27/97	CY51	6410	94	7:05:36	15:56:37	8:51:01
05/27/97	CY54	0432	107	7:35:14	17:59:32	10:24:18
05/28/97	CY46	1133	89	7:04:14	16:28:39	9:24:25
05/28/97	CY51	6410	86	7:32:45	15:29:31	7:56:46
05/28/97	CY54	0432	100	7:14:35	16:03:14	8:48:39
05/29/97	CY46	1133	83	7:05:09	15:52:00	8:46:51
05/29/97	CY50	8717	87	7:10:31	15:02:46	7:52:15
05/29/97	CY51	6419	106	8:06:11	18:07:28	10:01:17
05/29/97	CY54	0474	97	7:09:58	16:32:01	9:22:03
05/30/97	CY46	1133	80	7:04:42	16:17:15	9:12:33
05/30/97	CY47	1411	106	7:17:26	18:48:14	11:30:48
05/30/97	CY50	8717	99	7:03:14	15:48:44	8:45:30
05/30/97	CY54	0474	104	6:39:44	15:18:10	8:38:26
05/31/97	CY02	1579	100	7:05:42	16:09:09	9:03:27
05/31/97	CY46	1133	77	7:06:18	15:39:46	8:33:28
05/31/97	CY47	1411	107	7:26:06	17:11:38	9:45:32
05/31/97	CY50	8717	50	7:08:35	15:29:22	8:20:47
05/31/97	CY54	0474	87	6:54:12	15:19:58	8:25:46
06/02/97	CY46	1148	78	7:08:23	16:19:41	9:11:18
06/02/97	CY52	1101	98	7:48:36	17:01:18	9:12:42
06/02/97	CY55	0621	108	7:38:13	19:13:24	11:35:11
06/03/97	CY52	1101	93	6:46:50	15:13:47	8:26:57
06/03/97	CY55	0621	88	7:16:24	15:58:54	8:42:30
06/04/97	CY02	1581	97	6:56:45	16:44:35	9:47:50
06/04/97	CY47	1508	92	7:16:25	16:37:04	9:20:39
06/04/97	CY50	8701	111	7:06:38	17:09:19	10:02:41
06/04/97	CY52	1101	87	6:31:40	14:58:33	8:26:53
06/04/97	CY55	0621	97	7:03:57	16:48:20	9:44:23
06/05/97	CY02	1581	111	6:54:49	17:03:24	10:08:35
06/05/97	CY46	1148	82	7:06:42	16:56:09	9:49:27
06/05/97	CY50	8701	87	7:46:53	16:06:45	8:19:52
06/05/97	CY52	1111	89	6:39:35	15:54:31	9:14:56

Attachment to in Response to MPA/USPS-T13-56

06/05/97	CY55	0611	103	8:04:23	18:27:20	10:22:57
06/06/97	CY02	1581	98	6:35:58	15:32:37	8:56:39
06/06/97	CY46	1148	81	7:06:27	14:51:05	7:44:38
06/06/97	CY50	8701	94	7:24:03	15:42:51	8:18:48
06/06/97	CY55	0611	94	6:56:51	15:59:06	9:02:15
06/07/97	CY02	1581	97	6:35:33	15:02:22	8:26:49
06/07/97	CY46	1148	47	7:08:46	11:28:32	4:19:46
06/07/97	CY50	8701	93	7:08:12	15:44:26	8:36:14
06/07/97	CY55	0611	97	7:55:26	16:48:26	8:53:00
06/09/97	CY02	1581	95	7:34:52	16:03:23	8:28:31
06/09/97	CY46	1148	85	7:07:27	15:37:37	8:30:10
06/09/97	CY50	8701	120	6:41:25	17:53:34	11:12:09
06/09/97	CY52	1131	92	6:35:01	14:58:59	8:23:58
06/09/97	CY55	1605	85	6:19:07	15:14:08	8:55:01
06/10/97	CY02	1581	98	7:07:30	15:58:28	8:50:58
06/10/97	CY46	1148	84	7:08:21	15:43:55	8:35:34
06/10/97	CY47	1508	101	7:21:04	16:43:00	9:21:56
06/10/97	CY50	8701	107	7:14:50	17:46:40	10:31:50
06/10/97	CY52	1131	89	6:37:43	14:58:04	8:20:21
06/10/97	CY55	1605	71	6:06:32	12:20:55	6:14:23
06/11/97	CY02	1581	92	7:00:15	16:03:44	9:03:29
06/11/97	CY50	8701	99	7:09:43	15:57:37	8:47:54
06/11/97	CY55	1605	89	6:33:49	15:15:24	8:41:35
06/12/97	CY02	1581	104	7:34:06	17:07:51	9:33:45
06/12/97	CY46	1148	89	7:14:59	17:26:45	10:11:46
06/12/97	CY50	8701	97	7:05:49	16:06:26	9:00:37
06/12/97	CY52	1121	70	6:34:20	13:29:18	6:54:58
06/12/97	CY55	1606	84	6:33:37	14:23:39	7:50:02
06/13/97	CY02	1581	114	6:56:22	17:34:31	10:38:09
06/13/97	CY47	1508	92	7:18:39	15:54:25	8:35:46
06/13/97	CY50	8701	96	7:45:58	16:07:39	8:21:41
06/13/97	CY52	1121	77	6:37:41	13:43:13	7:05:32
06/13/97	CY55	1606	93	6:43:16	15:05:53	8:22:37
06/14/97	CY02	1581	103	6:54:23	17:38:47	10:44:24
06/14/97	CY50	8701	74	7:21:23	14:21:36	7:00:13
06/14/97	CY55	1606	75	6:36:58	13:26:05	6:49:07
06/16/97	CY02	1581	114	7:02:34	17:48:37	10:46:03
06/16/97	CY46	1148	83	7:11:09	15:05:48	7:54:39
06/16/97	CY47	1508	96	7:04:13	16:31:16	9:27:03
06/16/97	CY50	8701	122	7:04:51	18:13:36	11:08:45
06/16/97	CY53	2219	90	7:09:58	15:29:30	8:19:32
06/17/97	CY02	1581	92	7:40:45	16:15:57	8:35:12
06/17/97	CY46	1148	90	7:08:03	15:38:50	8:30:47
06/17/97	CY47	1508	108	7:05:52	16:43:26	9:37:34
06/17/97	CY50	8701	111	7:01:32	16:52:37	9:51:05
06/17/97	CY53	2219	89	6:36:50	15:03:16	8:26:26
06/17/97	CY56	0467	90	7:34:10	16:28:37	8:54:27
06/18/97	CY02	1581	117	7:19:15	18:07:38	10:48:23
06/18/97	CY46	1148	91	7:11:59	17:10:29	9:58:30
06/18/97	CY47	1508	99	7:07:28	17:05:56	9:58:28
06/18/97	CY50	8701	94	7:05:44	15:48:47	8:43:03
06/18/97	CY53	2219	81	6:36:39	14:03:10	7:26:31
06/18/97	CY56	0467	75	7:31:44	14:28:09	6:56:25
06/19/97	CY02	1581	103	6:58:42	16:16:43	9:18:01
06/19/97	CY50	8701	85	7:45:27	17:03:49	9:18:22
06/19/97	CY53	2227	81	7:10:05	17:22:47	10:12:42

Attachment to in Response to MPA/USPS-T13-56

06/19/97	CY56	0498	99	7:34:18	18:35:15	11:00:57
06/20/97	CY02	1581	87	6:49:57	14:46:54	7:56:57
06/20/97	CY46	1148	75	7:07:29	14:14:21	7:06:52
06/20/97	CY50	8701	86	7:11:42	16:10:33	8:58:51
06/20/97	CY56	0498	119	7:16:56	18:47:37	11:30:41
06/21/97	CY02	1581	98	6:40:53	15:50:00	9:09:07
06/21/97	CY46	1148	82	7:11:40	16:07:30	8:55:50
06/21/97	CY47	1508	72	7:04:26	15:32:26	8:28:00
06/21/97	CY50	8701	67	7:30:40	15:26:17	7:55:37
06/21/97	CY53	2227	80	6:38:22	15:16:27	8:38:05
06/21/97	CY56	0498	79	7:27:05	14:47:56	7:20:51
06/23/97	CY02	1581	103	6:54:13	16:51:31	9:57:18
06/23/97	CY46	1148	77	7:07:11	14:56:10	7:48:59
06/23/97	CY47	1508	105	7:07:52	16:27:28	9:19:36
06/23/97	CY50	8701	102	7:37:25	16:51:46	9:14:21
06/23/97	CY53	2214	101	6:32:46	15:48:24	9:15:38
06/23/97	CY56	0405	91	7:30:37	15:54:32	8:23:55
06/24/97	CY02	1581	80	7:29:49	15:08:00	7:38:11
06/24/97	CY46	1148	92	7:07:09	15:58:38	8:51:29
06/24/97	CY47	1508	93	7:02:45	16:19:44	9:16:59
06/24/97	CY50	8701	111	7:08:03	16:52:12	9:44:09
06/24/97	CY53	2214	75	6:45:00	13:52:19	7:07:19
06/24/97	CY56	0405	77	7:37:09	15:42:03	8:04:54
06/25/97	CY02	1581	117	6:32:29	16:34:55	10:02:26
06/25/97	CY46	1148	91	7:09:05	15:55:14	8:46:09
06/25/97	CY47	1508	102	7:13:20	16:58:15	9:44:55
06/25/97	CY50	8701	96	7:09:43	15:37:38	8:27:55
06/25/97	CY53	2214	93	6:32:54	14:54:03	8:21:09
06/25/97	CY56	0405	101	7:35:40	16:26:54	8:51:14
06/26/97	CY02	1581	113	6:27:17	17:54:16	11:26:59
06/26/97	CY46	1148	94	7:07:53	17:25:16	10:17:23
06/26/97	CY50	8701	96	7:05:16	15:43:36	8:38:20
06/26/97	CY56	1049	93	7:34:33	15:40:05	8:05:32
06/27/97	CY02	1581	110	6:32:59	16:59:37	10:26:38
06/27/97	CY46	1148	74	7:08:50	15:35:55	8:27:05
06/27/97	CY50	8701	95	7:21:58	16:17:11	8:55:13
06/27/97	CY53	2215	94	6:36:54	16:55:20	10:18:26
06/27/97	CY56	1049	84	7:37:00	15:09:32	7:32:32
06/28/97	CY02	1581	96	6:34:18	15:55:42	9:21:24
06/28/97	CY46	1148	41	8:25:28	14:15:36	5:50:08
06/28/97	CY50	8701	93	7:27:36	15:48:32	8:20:56
06/28/97	CY56	1049	87	7:39:18	15:41:21	8:02:03
06/30/97	CY04	4243	104	6:40:57	16:33:22	9:52:25
06/30/97	CY46	1145	86	7:07:05	15:10:09	8:03:04
06/30/97	CY47	1475	109	7:02:23	17:13:50	10:11:27
06/30/97	CY50	8735	105	7:11:26	16:43:11	9:31:45
06/30/97	CY57	3716	94	7:08:44	15:44:16	8:35:32
06/30/97	CY60	1929	92	7:37:36	16:08:17	8:30:41
07/01/97	CY04	4243	93	7:04:25	15:11:41	8:07:16
07/01/97	CY46	1145	79	7:07:50	17:24:51	10:17:01
07/01/97	CY47	1475	112	7:07:54	17:44:13	10:36:19
07/01/97	CY50	8735	106	7:14:51	16:42:16	9:27:25
07/01/97	CY57	3716	65	7:06:59	14:50:51	7:43:52
07/01/97	CY60	1929	105	7:28:49	17:08:09	9:39:20
07/02/97	CY04	4243	82	7:03:19	14:41:52	7:38:33
07/02/97	CY46	1145	94	6:33:47	15:55:04	9:21:17

Attachment to in Response to MPA/USPS-T13-56

07/02/97	CY50	8735	97	7:36:49	15:51:04	8:14:15
07/02/97	CY57	3716	88	7:06:03	15:10:55	8:04:52
07/03/97	CY46	1145	84	7:07:47	16:11:20	9:03:33
07/03/97	CY47	1475	97	7:13:20	18:02:53	10:49:33
07/03/97	CY50	8735	94	7:07:59	15:55:31	8:47:32
07/03/97	CY57	3709	89	7:03:57	15:55:23	8:51:26
07/03/97	CY60	1913	84	7:40:35	16:01:07	8:20:32
07/05/97	CY04	4243	120	7:12:03	17:45:28	10:33:25
07/05/97	CY46	1145	91	6:16:41	15:47:17	9:30:36
07/05/97	CY47	1475	111	6:35:19	18:35:14	11:59:55
07/05/97	CY50	8735	102	6:36:52	15:47:58	9:11:06
07/05/97	CY57	3709	96	7:01:11	15:25:26	8:24:15
07/05/97	CY60	1913	95	7:37:14	16:51:57	9:14:43
07/07/97	CY04	4243	103	7:11:28	16:32:52	9:21:24
07/07/97	CY46	1145	95	7:02:29	15:48:54	8:46:25
07/07/97	CY47	1475	98	7:03:25	16:50:30	9:47:05
07/07/97	CY50	8735	120	7:09:25	17:31:02	10:21:37
07/07/97	CY57	3707	96	7:03:47	16:08:53	9:05:06
07/07/97	CY60	1901	96	7:31:55	16:35:18	9:03:23
07/08/97	CY04	4243	84	7:06:35	14:57:40	7:51:05
07/08/97	CY46	1145	96	7:04:51	15:56:02	8:51:11
07/08/97	CY47	1475	101	7:01:49	16:53:45	9:51:56
07/08/97	CY50	8735	104	7:38:02	16:53:18	9:15:16
07/08/97	CY57	3707	93	7:08:34	16:01:20	8:52:46
07/08/97	CY60	1901	97	7:34:50	16:42:04	9:07:14
07/09/97	CY04	4243	95	7:07:34	15:28:29	8:20:55
07/09/97	CY46	1145	94	7:02:47	15:30:38	8:27:51
07/09/97	CY47	1475	110	7:03:51	17:31:13	10:27:22
07/09/97	CY50	8735	98	7:24:19	15:50:52	8:26:33
07/09/97	CY57	3707	88	7:05:18	15:02:00	7:56:42
07/09/97	CY60	1901	95	7:35:41	16:38:11	9:02:30
07/10/97	CY04	4243	90	7:18:29	15:32:34	8:14:05
07/10/97	CY46	1145	90	7:06:32	16:50:54	9:44:22
07/10/97	CY47	1475	106	7:03:31	18:10:20	11:06:49
07/10/97	CY50	8735	91	7:01:16	15:43:54	8:42:38
07/10/97	CY57	3704	101	7:32:21	16:20:26	8:48:05
07/10/97	CY60	1917	86	7:34:40	15:52:35	8:17:55
07/11/97	CY04	4243	93	7:04:11	15:31:05	8:26:54
07/11/97	CY46	1145	80	8:37:53	16:30:18	7:52:25
07/11/97	CY47	1475	90	7:07:36	16:32:33	9:24:57
07/11/97	CY50	8735	90	7:06:45	15:37:02	8:30:17
07/11/97	CY57	3704	98	7:27:02	15:56:26	8:29:24
07/12/97	CY04	4243	77	7:06:34	14:16:27	7:09:53
07/12/97	CY46	1145	88	6:07:50	13:46:05	7:38:15
07/12/97	CY47	1475	99	7:05:26	16:33:30	9:28:04
07/12/97	CY50	8735	94	6:55:00	15:39:11	8:44:11
07/12/97	CY57	3704	94	7:32:49	15:53:40	8:20:51
07/12/97	CY60	1917	83	7:32:15	15:16:55	7:44:40
07/14/97	CY04	4243	101	7:09:42	16:34:37	9:24:55
07/14/97	CY46	1145	86	7:06:10	15:02:06	7:55:56
07/14/97	CY47	1475	111	7:03:21	17:45:47	10:42:26
07/14/97	CY50	8735	80	7:10:06	15:37:10	8:27:04
07/15/97	CY04	4243	90	7:05:22	15:32:31	8:27:09
07/15/97	CY46	1145	103	7:06:01	16:18:13	9:12:12
07/15/97	CY47	1475	94	7:06:39	16:18:08	9:11:29
07/15/97	CY50	8735	97	7:05:58	15:32:45	8:26:47

Attachment to in Response to MPA/USPS-T13-56

07/15/97	CY58	8212	95	7:39:13	16:36:37	8:57:24
07/15/97	CY61	4271	80	7:06:01	14:31:34	7:25:33
07/16/97	CY04	4243	90	7:03:21	15:51:34	8:48:13
07/16/97	CY46	1145	93	7:06:57	15:51:45	8:44:48
07/16/97	CY47	1475	98	7:11:13	16:20:16	9:09:03
07/16/97	CY50	8735	100	7:03:24	15:54:15	8:50:51
07/16/97	CY58	8212	107	7:13:52	17:42:46	10:28:54
07/16/97	CY61	4271	78	7:07:11	14:27:29	7:20:18
07/17/97	CY04	4243	91	7:04:05	15:22:58	8:18:53
07/17/97	CY46	1145	103	7:05:51	17:52:55	10:47:04
07/17/97	CY50	8735	13	14:47:24	15:42:52	0:55:28
07/17/97	CY58	8217	84	7:29:53	15:08:19	7:38:26
07/17/97	CY61	2717	88	7:07:56	16:21:27	9:13:31
07/18/97	CY04	4243	88	7:03:36	16:01:36	8:58:00
07/18/97	CY47	1475	91	6:59:17	15:44:01	8:44:44
07/18/97	CY50	8735	94	7:06:44	15:36:30	8:29:46
07/18/97	CY58	8217	95	7:27:28	16:55:47	9:28:19
07/18/97	CY61	2717	83	7:04:15	14:39:58	7:35:43
07/19/97	CY04	4243	70	7:05:09	14:12:58	7:07:49
07/19/97	CY47	1475	95	7:02:19	16:20:40	9:18:21
07/19/97	CY50	8735	94	7:06:05	15:29:51	8:23:46
07/19/97	CY58	8217	79	7:27:57	14:34:23	7:06:26
07/19/97	CY61	2717	63	7:03:56	12:59:50	5:55:54
07/21/97	CY04	4243	109	6:04:43	16:20:22	10:15:39
07/21/97	CY46	1145	111	6:30:18	16:42:00	10:11:42
07/21/97	CY47	1475	106	7:05:09	17:13:53	10:08:44
07/21/97	CY58	8218	107	7:39:40	17:06:45	9:27:05
07/21/97	CY61	4275	93	7:02:10	17:03:43	10:01:33
07/22/97	CY04	4243	89	7:04:09	15:06:48	8:02:39
07/22/97	CY46	1145	107	6:33:14	16:29:59	9:56:45
07/22/97	CY47	1475	99	7:02:36	16:07:18	9:04:42
07/22/97	CY58	8218	94	7:32:05	16:26:10	8:54:05
07/22/97	CY61	4275	95	7:03:59	16:00:27	8:56:28
07/23/97	CY04	4243	90	7:09:07	15:29:58	8:20:51
07/23/97	CY46	1145	91	7:05:51	15:33:18	8:27:27
07/23/97	CY47	1475	102	7:03:42	16:12:18	9:08:36
07/23/97	CY58	8218	97	7:44:49	16:32:58	8:48:09
07/23/97	CY61	4275	91	7:04:17	15:49:09	8:44:52
07/24/97	CY04	4243	92	7:05:29	15:35:22	8:29:53
07/24/97	CY46	1145	93	7:07:21	17:27:15	10:19:54
07/24/97	CY50	8735	93	7:38:06	15:58:45	8:20:39
07/24/97	CY58	8221	57	7:33:11	14:06:28	6:33:17
07/24/97	CY61	4273	87	7:09:35	15:59:34	8:49:59
07/25/97	CY04	4243	87	7:02:24	15:44:34	8:42:10
07/25/97	CY47	1475	93	7:02:42	15:56:48	8:54:06
07/25/97	CY50	8735	88	7:24:58	15:23:09	7:58:11
07/25/97	CY58	8221	55	7:31:45	13:14:30	5:42:45
07/25/97	CY61	4273	86	7:08:29	15:33:00	8:24:31
07/26/97	CY04	4243	93	6:22:13	15:09:59	8:47:46
07/26/97	CY46	1145	79	7:06:52	15:50:30	8:43:38
07/26/97	CY47	1475	103	7:05:50	16:45:13	9:39:23
07/26/97	CY58	8221	56	7:31:24	13:08:57	5:37:33
07/28/97	CY04	4234	90	7:20:52	15:41:43	8:20:51
07/28/97	CY46	1132	102	6:37:47	17:41:46	11:03:59
07/28/97	CY47	1586	93	7:02:33	15:33:00	8:30:27
07/28/97	CY50	8759	107	7:06:59	17:07:28	10:00:29

Attachment to in Response to MPA/USPS-T13-56

07/28/97	CY59	0320	105	6:41:52	16:27:12	9:45:20
07/28/97	CY62	0406	102	7:02:35	16:47:53	9:45:18
07/29/97	CY04	4234	88	7:19:56	15:48:01	8:28:05
07/29/97	CY46	1132	97	7:07:59	16:20:48	9:12:49
07/29/97	CY47	1586	97	7:06:09	16:15:35	9:09:26
07/29/97	CY50	8759	113	7:05:00	17:20:31	10:15:31
07/29/97	CY59	0320	96	6:31:18	15:44:52	9:13:34
07/29/97	CY62	0406	100	6:07:04	15:39:59	9:32:55
07/30/97	CY04	4234	93	7:16:46	15:43:29	8:26:43
07/30/97	CY46	1132	82	7:03:20	16:05:24	9:02:04
07/30/97	CY47	1586	76	7:03:39	14:00:07	6:56:28
07/30/97	CY59	0320	94	6:34:36	15:32:51	8:58:15
07/30/97	CY62	0406	51	7:22:12	11:58:40	4:36:28
07/31/97	CY04	4234	87	7:19:48	15:38:32	8:18:44
07/31/97	CY46	1132	85	7:08:49	14:56:26	7:47:37
07/31/97	CY47	1586	96	7:03:14	15:29:41	8:26:27
07/31/97	CY50	8739	92	7:46:06	16:06:52	8:20:46
07/31/97	CY59	0305	86	6:31:49	14:46:34	8:14:45
07/31/97	CY62	0415	110	6:54:16	17:52:39	10:58:23
08/01/97	CY04	4234	94	7:18:03	15:46:59	8:28:56
08/01/97	CY46	1132	79	7:07:18	15:03:48	7:56:30
08/01/97	CY47	1586	91	7:02:43	15:29:28	8:26:45
08/01/97	CY50	8759	100	7:03:09	15:48:12	8:45:03
08/01/97	CY59	0305	98	6:28:42	15:43:47	9:15:05
08/01/97	CY62	0415	108	6:53:55	16:44:10	9:50:15
08/02/97	CY04	4234	92	7:16:49	15:50:08	8:33:19
08/02/97	CY46	1132	75	7:04:09	14:19:14	7:15:05
08/02/97	CY47	1586	87	6:59:58	14:57:50	7:57:52
08/02/97	CY50	8759	95	7:02:58	15:41:30	8:38:32
08/02/97	CY59	0305	92	6:31:02	15:37:34	9:06:32
08/02/97	CY62	0415	96	6:52:53	16:53:32	10:00:39
08/04/97	CY04	4234	99	6:37:07	15:53:28	9:16:21
08/04/97	CY46	1132	80	7:04:42	14:45:30	7:40:48
08/04/97	CY47	1586	96	7:05:00	15:34:41	8:29:41
08/04/97	CY59	2417	91	6:34:14	15:26:17	8:52:03
08/04/97	CY62	0424	103	6:59:48	16:42:28	9:42:40
08/05/97	CY04	4234	95	7:17:37	17:19:39	10:02:02
08/05/97	CY46	1132	90	7:06:10	16:10:29	9:04:19
08/05/97	CY47	1586	94	7:01:07	15:33:37	8:32:30
08/05/97	CY50	8759	95	7:09:02	15:36:12	8:27:10
08/05/97	CY59	2417	83	6:34:24	14:43:16	8:08:52
08/05/97	CY62	0424	98	6:44:23	16:11:30	9:27:07
08/06/97	CY04	4234	92	7:17:13	15:37:49	8:20:36
08/06/97	CY46	1132	90	6:35:54	15:06:09	8:30:15
08/06/97	CY47	1586	86	7:05:13	15:15:36	8:10:23
08/06/97	CY50	8759	105	7:08:30	16:29:06	9:20:36
08/06/97	CY59	2417	89	7:08:52	16:05:54	8:57:02
08/06/97	CY62	0424	87	6:39:51	14:54:31	8:14:40
08/07/97	CY04	4234	95	7:20:33	16:11:02	8:50:29
08/07/97	CY46	1132	84	7:14:08	14:52:00	7:37:52
08/07/97	CY47	1586	70	7:04:03	14:28:28	7:24:25
08/07/97	CY50	8759	103	7:06:28	16:26:20	9:19:52
08/07/97	CY59	2402	78	6:36:13	14:29:52	7:53:39
08/07/97	CY62	0426	94	6:57:12	15:13:21	8:16:09
08/08/97	CY04	4234	94	7:16:00	15:46:11	8:30:11
08/08/97	CY46	1132	76	7:04:33	16:13:39	9:09:06

Attachment to in Response to MPA/USPS-T13-56

08/08/97	CY47	1586	79	7:01:22	15:47:12	8:45:50
08/08/97	CY50	8759	94	7:12:20	16:08:40	8:56:20
08/08/97	CY59	2402	75	6:34:14	14:03:12	7:28:58
08/08/97	CY62	0426	84	6:39:21	14:31:44	7:52:23
08/09/97	CY04	4234	92	7:15:49	15:43:48	8:27:59
08/09/97	CY46	1132	82	7:05:55	14:30:10	7:24:15
08/09/97	CY47	1586	75	7:09:14	14:52:44	7:43:30
08/09/97	CY50	8759	94	7:08:29	16:04:14	8:55:45
08/09/97	CY59	2402	72	6:38:37	14:28:48	7:50:11
08/09/97	CY62	0426	79	6:48:47	14:12:30	7:23:43
08/11/97	CY04	4234	109	6:34:13	16:42:40	10:08:27
08/11/97	CY46	1132	88	7:11:42	16:10:15	8:58:33
08/11/97	CY47	1586	94	6:47:21	15:53:57	9:06:36
08/11/97	CY50	8759	110	7:08:53	17:14:47	10:05:54
08/11/97	CY64	1401	90	7:06:09	16:48:23	9:42:14
08/12/97	CY04	4234	89	6:33:03	15:48:23	9:15:20
08/12/97	CY46	1132	94	7:01:54	15:52:22	8:50:28
08/12/97	CY47	1586	90	7:06:01	16:02:07	8:56:06
08/12/97	CY50	8759	110	7:11:31	16:55:59	9:44:28
08/12/97	CY63	0825	94	6:36:23	15:08:13	8:31:50
08/12/97	CY64	1401	95	7:02:53	16:30:03	9:27:10
08/13/97	CY04	4234	82	7:18:00	15:50:16	8:32:16
08/13/97	CY46	1132	79	7:09:08	15:38:34	8:29:26
08/13/97	CY47	1586	76	7:09:30	13:57:37	6:48:07
08/13/97	CY50	8759	103	7:10:42	16:23:28	9:12:46
08/13/97	CY63	0825	94	6:37:35	15:14:18	8:36:43
08/13/97	CY64	1401	92	6:36:42	15:42:10	9:05:28
08/14/97	CY04	4234	97	7:19:42	16:42:02	9:22:20
08/14/97	CY46	1132	92	7:02:51	15:39:23	8:36:32
08/14/97	CY47	1586	95	7:04:04	15:30:47	8:26:43
08/14/97	CY50	8759	100	7:03:38	16:12:24	9:08:46
08/14/97	CY63	0825	89	6:33:55	14:18:29	7:44:34
08/14/97	CY64	2407	73	7:01:57	14:41:05	7:39:08
08/15/97	CY04	4234	111	7:18:13	18:28:06	11:09:53
08/15/97	CY46	1132	86	6:07:44	16:12:07	10:04:23
08/15/97	CY47	1586	90	7:03:38	15:23:23	8:19:45
08/15/97	CY63	0825	74	7:01:02	13:56:19	6:55:17
08/15/97	CY64	2407	77	7:03:15	14:48:03	7:44:48
08/16/97	CY04	4234	92	7:21:00	15:42:27	8:21:27
08/16/97	CY46	1132	75	7:04:11	14:43:40	7:39:29
08/16/97	CY47	1586	77	7:03:40	14:25:49	7:22:09
08/16/97	CY50	8759	91	6:38:12	15:38:41	9:00:29
08/16/97	CY63	0825	74	7:02:53	13:47:23	6:44:30
08/16/97	CY64	2407	97	6:58:56	16:16:13	9:17:17
08/18/97	CY04	4234	117	6:34:31	17:47:37	11:13:06
08/18/97	CY46	1132	87	7:07:28	15:42:50	8:35:22
08/18/97	CY63	0825	97	6:34:04	15:21:58	8:47:54
08/18/97	CY64	1457	90	7:06:06	17:20:39	10:14:33
08/19/97	CY04	4234	90	7:23:21	15:30:54	8:07:33
08/19/97	CY46	1132	96	7:06:03	16:02:50	8:56:47
08/19/97	CY47	1586	81	7:03:43	14:45:42	7:41:59
08/19/97	CY63	0825	81	6:34:20	15:52:47	9:18:27
08/19/97	CY64	1457	94	7:08:12	15:38:12	8:30:00
08/20/97	CY04	4234	91	7:17:07	15:48:32	8:31:25
08/20/97	CY46	1132	91	7:07:30	16:01:43	8:54:13
08/20/97	CY47	1586	60	7:06:36	14:16:27	7:09:51

Attachment to in Response to MPA/USPS-T13-56

08/20/97	CY50	8759	103	7:08:48	16:05:47	8:56:59
08/20/97	CY63	0825	84	6:34:54	14:15:29	7:40:35
08/20/97	CY64	1457	94	7:03:15	16:00:44	8:57:29
08/21/97	CY04	4234	96	7:20:33	15:49:54	8:29:21
08/21/97	CY46	1132	88	7:05:45	16:15:02	9:09:23
08/21/97	CY47	1586	56	7:57:42	14:41:44	6:44:02
08/21/97	CY63	0827	100	7:04:07	15:43:02	8:38:55
08/21/97	CY64	2411	79	7:03:42	14:43:46	7:40:04
08/22/97	CY04	4234	100	7:20:25	18:45:03	11:24:38
08/22/97	CY46	1132	80	7:04:21	15:55:49	8:51:28
08/22/97	CY47	1586	59	7:15:40	15:14:46	7:59:06
08/22/97	CY50	8759	75	7:07:08	13:56:57	6:49:49
08/22/97	CY63	0827	92	7:06:31	15:32:59	8:26:28
08/22/97	CY64	2411	86	7:09:52	15:56:06	8:46:14
08/23/97	CY46	1132	78	6:47:53	15:09:41	8:21:48
08/23/97	CY50	8759	75	7:06:12	13:56:56	6:50:44
08/23/97	CY63	0827	92	7:06:33	15:27:21	8:20:48
08/23/97	CY64	2411	94	7:00:24	16:43:39	9:43:15
08/25/97	CY04	4234	111	7:33:17	18:03:32	10:30:15
08/25/97	CY46	1142	102	7:09:42	16:36:51	9:27:09
08/25/97	CY47	1507	103	7:03:35	16:29:20	9:25:45
08/25/97	CY50	8744	101	7:12:16	15:57:53	8:45:37
08/25/97	CY63	0822	98	6:38:54	15:29:50	8:50:56
08/26/97	CY04	4254	94	6:34:48	15:49:52	9:15:04
08/26/97	CY46	1142	82	7:25:53	15:30:55	8:05:02
08/26/97	CY47	1507	95	7:05:29	16:43:53	9:38:24
08/26/97	CY50	8744	107	7:08:31	16:41:09	9:32:38
08/26/97	CY63	0822	90	6:41:12	14:55:38	8:14:26
08/27/97	CY04	4254	112	7:35:40	18:01:47	10:26:07
08/27/97	CY46	1142	100	7:05:42	16:24:13	9:18:31
08/27/97	CY47	1507	83	7:00:58	15:25:11	8:24:13
08/27/97	CY50	8744	78	7:08:03	13:59:01	6:50:58
08/27/97	CY63	0822	92	6:33:50	14:59:59	8:26:09
08/28/97	CY04	4254	91	7:35:35	16:24:06	8:48:31
08/28/97	CY46	1142	87	7:07:02	16:01:13	8:54:11
08/28/97	CY47	1507	82	7:09:32	15:53:32	8:44:00
08/28/97	CY50	8744	97	7:06:58	16:27:50	9:20:52
08/28/97	CY63	0831	93	6:39:01	19:43:18	13:04:17
08/29/97	CY04	4254	94	7:38:26	16:34:43	8:56:17
08/29/97	CY46	1142	85	7:05:37	16:01:17	8:55:40
08/29/97	CY47	1507	94	7:03:48	17:51:39	10:47:51
08/29/97	CY50	8744	89	7:05:57	15:44:57	8:39:00
08/29/97	CY63	0831	117	6:38:51	17:09:29	10:30:38
08/30/97	CY04	4254	94	7:37:12	16:32:31	8:55:19
08/30/97	CY46	1142	101	7:05:33	16:53:06	9:47:33
08/30/97	CY47	1507	91	7:08:09	16:55:18	9:47:09
08/30/97	CY50	8744	100	8:14:05	17:09:23	8:55:18
08/30/97	CY63	0831	98	6:08:44	14:46:42	8:37:58
09/02/97	CY04	4254	126	6:35:59	19:50:07	13:14:08
09/02/97	CY46	1142	104	6:10:30	17:20:39	11:10:09
09/02/97	CY47	1507	117	6:05:22	17:57:04	11:51:42
09/02/97	CY50	8744	108	7:09:46	16:54:14	9:44:28
09/02/97	CY63	0828	100	7:43:39	18:36:32	10:52:53
09/03/97	CY04	4254	108	6:34:17	17:06:38	10:32:21
09/03/97	CY46	1142	87	7:06:32	16:28:14	9:21:42
09/03/97	CY47	1507	80	7:04:50	17:04:33	9:59:43

Attachment to in Response to MPA/USPS-T13-56

09/03/97	CY50	8744	112	7:06:11	17:15:39	10:09:28
09/03/97	CY63	0828	105	7:03:24	16:32:57	9:29:33
09/04/97	CY04	4254	104	6:35:07	17:08:56	10:33:49
09/04/97	CY46	1142	87	6:15:29	15:49:58	9:34:29
09/04/97	CY47	1507	91	7:02:57	17:34:24	10:31:27
09/04/97	CY50	8744	106	7:10:48	16:37:52	9:27:04
09/04/97	CY63	0807	93	7:10:45	15:35:21	8:24:36
09/05/97	CY04	4254	110	7:30:45	18:02:16	10:31:31
09/05/97	CY46	1142	94	6:43:06	15:41:00	8:57:54
09/05/97	CY50	8744	111	7:10:52	17:18:16	10:07:24
09/05/97	CY63	0807	93	7:06:21	15:37:20	8:30:59
09/06/97	CY04	4254	101	7:20:54	16:37:14	9:16:20
09/06/97	CY46	1142	106	6:05:27	16:40:15	10:34:48
09/06/97	CY47	1507	44	7:06:08	11:13:32	4:07:24
09/06/97	CY50	8744	93	7:14:41	16:00:24	8:45:43
09/06/97	CY63	0807	94	7:09:54	15:30:55	8:21:01
09/08/97	CY04	4254	94	7:30:52	16:02:27	8:31:35
09/08/97	CY46	1142	104	6:26:08	16:16:59	9:50:51
09/08/97	CY47	1507	107	7:03:47	17:11:07	10:07:20
09/08/97	CY50	8744	100	7:33:48	16:31:17	8:57:29
09/08/97	CY63	0830	103	6:48:43	16:27:56	9:39:13
09/09/97	CY04	4254	117	7:31:00	18:05:49	10:34:49
09/09/97	CY46	1142	94	7:05:42	16:46:14	9:40:32
09/09/97	CY50	8744	112	7:08:15	16:53:39	9:45:24
09/09/97	CY63	0830	112	6:47:02	16:50:28	10:03:26
09/10/97	CY04	4254	110	6:32:20	16:58:18	10:25:58
09/10/97	CY46	1142	98	7:05:04	17:02:12	9:57:08
09/10/97	CY47	1507	93	7:06:58	16:12:42	9:05:44
09/10/97	CY50	8744	102	7:13:16	16:24:03	9:10:47
09/10/97	CY63	0830	104	6:45:27	15:54:27	9:09:00
09/11/97	CY04	4254	88	7:16:32	15:46:04	8:29:32
09/11/97	CY46	1142	92	7:07:25	16:29:14	9:21:49
09/11/97	CY47	1507	106	7:12:09	18:25:48	11:13:39
09/11/97	CY50	8744	108	7:19:48	17:05:18	9:45:30
09/11/97	CY63	0824	83	6:40:11	15:29:50	8:49:39
09/12/97	CY04	4254	85	7:47:18	16:23:09	8:35:51
09/12/97	CY46	1142	101	7:06:16	17:44:49	10:38:33
09/12/97	CY50	8744	92	6:59:56	16:22:30	9:22:34
09/12/97	CY63	0824	94	6:40:04	15:07:54	8:27:50
09/13/97	CY04	4254	87	7:38:57	16:27:30	8:48:33
09/13/97	CY46	1142	102	7:02:30	17:13:09	10:10:39
09/13/97	CY47	1507	94	7:14:02	18:06:38	10:52:36
09/13/97	CY50	8744	83	7:11:45	14:59:09	7:47:24
09/13/97	CY63	0824	88	6:40:49	14:56:49	8:16:00
09/15/97	CY46	1142	105	7:06:11	16:59:24	9:53:13
09/15/97	CY50	8744	100	8:27:44	17:57:05	9:29:21
09/15/97	CY63	0820	94	7:08:14	15:37:37	8:29:23
09/16/97	CY46	1142	105	7:06:08	17:29:11	10:23:03
09/16/97	CY50	8744	112	7:12:45	17:27:01	10:14:16
09/16/97	CY63	0820	90	7:44:21	15:37:45	7:53:24
09/17/97	CY46	1142	94	7:01:51	15:45:33	8:43:42
09/17/97	CY50	8744	113	7:10:59	17:18:00	10:07:01
09/17/97	CY63	0820	80	7:07:17	14:36:45	7:29:28
09/18/97	CY46	1142	86	7:02:32	15:41:35	8:39:03
09/18/97	CY50	8744	101	7:16:18	16:35:05	9:18:47
09/18/97	CY63	0811	97	7:13:58	17:23:19	10:09:21

Attachment to in Response to MPA/USPS-T13-56

09/19/97	CY46	1142	84	7:07:28	15:28:15	8:20:47
09/19/97	CY50	8744	96	7:12:45	15:44:40	8:31:55
09/19/97	CY63	0811	90	7:10:44	16:45:40	9:34:56
09/20/97	CY46	1142	66	9:37:21	16:23:54	6:46:33
09/20/97	CY50	8744	74	7:09:26	15:28:38	8:19:12
09/20/97	CY63	0811	93	6:41:21	15:07:39	8:26:18
10/07/97	CY04	4945	104	6:31:45	17:14:03	10:42:18
10/08/97	CY04	4931	75	7:37:19	16:48:07	9:10:48
10/09/97	CY04	4940	102	6:45:52	17:48:42	11:02:50
10/10/97	CY04	4908	93	7:07:56	16:28:57	9:21:01
10/15/97	CY04	4912	98	7:57:36	17:38:14	9:40:38
10/16/97	CY04	4944	92	6:51:15	16:34:23	9:43:08
10/20/97	CY04	4920	102	6:40:53	17:38:31	10:57:38
10/20/97	CY50	8705	99	7:48:51	18:13:20	10:24:29
10/21/97	CY04	4917	88	7:19:15	16:35:21	9:16:06
10/21/97	CY50	8714	102	6:49:31	16:58:25	10:08:54
10/22/97	CY04	4909	71	7:36:59	15:49:50	8:12:51
10/22/97	CY04	4916	88	7:58:09	16:50:14	8:52:05
10/22/97	CY50	8703	85	7:45:10	16:11:26	8:26:16
10/23/97	CY04	4910	102	6:39:40	16:57:36	10:17:56
10/23/97	CY04	4926	90	7:02:43	16:23:32	9:20:49
10/23/97	CY50	8726	98	7:15:12	16:58:53	9:43:41
10/24/97	CY04	4915	104	6:33:38	16:58:01	10:24:23
10/24/97	CY50	8736	89	7:12:50	16:17:04	9:04:14
10/25/97	CY04	4906	88	7:07:09	16:19:35	9:12:26
10/25/97	CY50	8702	94	7:45:56	17:05:22	9:19:26
10/27/97	CY50	8727	102	7:18:34	17:30:37	10:12:03
10/27/97	CY53	2201	90	6:44:56	15:38:48	8:53:52
10/28/97	CY50	8748	91	6:42:07	15:48:20	9:06:13
10/28/97	CY53	2202	90	6:32:46	16:08:52	9:36:06
10/29/97	CY50	8770	58	7:40:41	13:16:58	5:36:17
10/29/97	CY53	2203	82	6:38:09	16:11:10	9:33:01
10/30/97	CY50	8747	72	8:02:23	16:48:06	8:45:43
10/30/97	CY53	2206	104	7:01:27	17:22:26	10:20:59
10/31/97	CY50	8729	92	6:47:20	16:02:02	9:14:42
10/31/97	CY53	2207	93	7:04:30	16:32:14	9:27:44
11/01/97	CY50	8711	101	7:05:31	18:06:50	11:01:19
11/01/97	CY53	2211	88	6:33:36	15:02:32	8:28:56
11/03/97	CY53	2205	97	6:39:29	17:16:13	10:36:44
11/04/97	CY50	8756	106	7:25:57	18:08:57	10:43:00
11/04/97	CY53	2212	76	6:36:33	14:39:25	8:02:52
11/05/97	CY50	8717	94	7:13:16	16:28:43	9:15:27
11/05/97	CY53	2210	79	7:43:44	16:44:40	9:00:56
11/06/97	CY50	8744	98	7:14:00	17:24:00	10:10:00
11/06/97	CY53	2213	80	7:06:30	15:52:04	8:45:34
11/07/97	CY50	8735	95	7:11:38	17:06:14	9:54:36
11/07/97	CY53	2214	89	6:34:32	16:05:11	9:30:39
11/08/97	CY50	8701	85	7:07:30	15:38:55	8:31:25
11/08/97	CY53	2215	98	6:33:24	16:10:30	9:37:06
11/10/97	CY50	8759	107	7:34:41	18:27:08	10:52:27
11/10/97	CY53	2216	91	7:09:04	16:05:59	8:56:55
11/12/97	CY50	8702	97	7:45:52	17:32:46	9:46:54
11/12/97	CY53	2219	87	6:45:48	17:23:04	10:37:16
11/12/97	CY63	0823	86	6:35:43	16:30:35	9:54:52
11/12/97	CY66	0129	86	7:45:45	16:28:10	8:42:25
11/13/97	CY53	2221	95	6:49:56	16:37:03	9:47:07

Attachment to in Response to MPA/USPS-T13-56

11/13/97	CY63	0821	84	6:10:01	15:33:43	9:23:42
11/14/97	CY53	2224	87	7:29:24	15:56:21	8:26:57
11/14/97	CY63	0803	100	6:41:37	17:12:12	10:30:35
11/14/97	CY66	0130	88	7:35:53	19:44:34	12:08:41
11/15/97	CY53	2225	61	6:39:49	15:46:28	9:06:39
11/15/97	CY63	0806	86	6:03:47	14:42:43	8:38:56
11/15/97	CY66	0131	37	8:42:04	12:25:35	3:43:31
11/17/97	CY63	0832	106	6:47:29	19:16:07	12:28:38
11/18/97	CY63	0817	82	7:15:41	15:52:40	8:36:59
11/19/97	CY63	0815	72	7:10:41	15:30:47	8:20:06
11/20/97	CY63	0816	79	7:07:32	16:43:22	9:35:50
11/21/97	CY63	0809	91	7:08:15	18:33:41	11:25:26
11/22/97	CY63	0808	94	7:05:57	16:36:36	9:30:39
11/24/97	CY04	4945	116	6:35:46	19:12:24	12:36:38
11/24/97	CY63	0801	95	7:37:31	17:33:04	9:55:33
11/24/97	CY63	0802	109	7:02:32	18:55:00	11:52:28
11/25/97	CY04	4931	112	6:02:47	17:05:52	11:03:05
11/25/97	CY63	0819	109	5:29:12	17:38:58	12:09:46
12/11/97	CY66	0242	84	7:14:17	15:29:22	8:15:05
12/12/97	CY04	4920	116	5:30:23	18:27:03	12:56:40
12/13/97	CY66	0251	82	7:12:22	16:04:26	8:52:04
12/15/97	CY04	4940	122	6:49:02	19:28:16	12:39:14
12/15/97	CY66	0249	124	6:41:09	20:47:29	14:06:20
12/16/97	CY66	0244	83	7:10:41	17:48:32	10:37:51
12/16/97	CY66	0370	93	7:08:11	16:32:23	9:24:12
12/17/97	CY66	0374	70	7:13:04	17:26:54	10:13:50
12/17/97	CY66	0382	95	7:07:47	18:33:50	11:26:03
12/18/97	CY04	4908	99	6:41:58	16:31:55	9:49:57
12/18/97	cy66	0377	84	7:10:23	16:40:21	9:29:58
12/18/97	CY66	0384	89	7:09:49	18:08:02	10:58:13
12/19/97	CY66	0255	80	7:09:42	15:52:41	8:42:59
12/19/97	CY66	0257	87	7:11:27	16:47:34	9:36:07
12/20/97	CY66	0114	61	7:43:17	14:37:57	6:54:40
12/20/97	CY66	0115	72	7:33:37	14:38:22	7:04:45
12/29/97	CY66	0106	109	7:36:52	19:08:13	11:31:21
12/30/97	CY66	0111	93	7:31:01	16:36:16	9:05:15
01/02/98	CY66	0116	90	7:21:32	16:06:10	8:44:38
01/02/98	CY66	0373	105	7:05:42	18:22:49	11:17:07
01/03/98	CY66	0246	89	7:06:35	16:17:50	9:11:15
01/05/98	CY66	0245	81	7:12:15	15:38:01	8:25:46
01/05/98	CY66	0247	90	7:07:34	17:13:27	10:05:53
01/06/98	CY66	0252	78	7:07:51	15:05:46	7:57:55
01/06/98	CY66	0375	85	7:06:08	15:32:43	8:26:35
01/07/98	CY66	0124	84	7:41:29	16:18:58	8:37:29
01/08/98	CY66	0112	88	7:44:30	16:10:11	8:25:41
01/08/98	CY66	0126	64	7:37:47	15:09:54	7:32:07
01/09/98	CY66	0119	93	7:41:48	16:39:08	8:57:20
01/09/98	CY66	0244	86	7:08:42	15:45:57	8:37:15
01/09/98	CY66	0376	72	7:15:06	14:37:08	7:22:02
01/10/98	CY66	0117	98	6:37:05	16:18:52	9:41:47
01/10/98	CY66	0248	94	7:01:47	16:12:05	9:10:18
01/10/98	CY66	0378	92	7:07:25	16:09:48	9:02:23
01/12/98	CY66	0102	101	7:39:29	17:28:22	9:48:53
01/12/98	CY66	0254	94	7:13:53	17:47:01	10:33:08
01/12/98	CY66	0379	85	7:03:22	15:35:13	8:31:51
01/13/98	CY66	0101	80	7:41:25	17:09:24	9:27:59

Attachment to in Response to MPA/USPS-T13-56

01/13/98	CY66	0120	86	7:38:05	16:06:33	8:28:28
01/13/98	CY66	0281	70	7:05:13	14:10:24	7:05:11
01/14/98	CY66	0123	91	7:35:55	17:02:33	9:26:38
01/20/98	CY66	0110	101	6:40:37	16:54:29	10:13:52
01/20/98	CY66	0380	111	6:39:32	18:29:47	11:50:15
01/20/98	CY66	0383	105	6:43:26	17:35:01	10:51:35
01/21/98	CY66	0103	104	7:09:34	17:56:31	10:46:57
01/21/98	CY66	0107	109	7:26:24	17:19:46	9:53:22
01/21/98	CY66	0128	104	7:07:59	17:35:16	10:27:17
01/22/98	CY66	0254	67	7:08:30	13:57:28	6:48:58
01/22/98	CY66	0372	87	7:05:58	16:00:52	8:54:54
01/26/98	CY04	4233	101	8:14:51	18:14:00	9:59:09
01/27/98	CY04	4285	73	8:17:27	16:20:19	8:02:52
01/28/98	CY04	4238	82	6:53:55	15:47:30	8:53:35
01/28/98	CY66	0105	78	7:38:09	16:07:29	8:29:20
01/28/98	CY66	0250	88	7:08:00	16:08:00	9:00:00
01/29/98	CY04	4214	90	6:12:29	15:56:40	9:44:11
01/29/98	CY66	0240	87	7:03:34	15:49:45	8:46:11
01/29/98	CY66	0253	93	7:07:20	16:12:43	9:05:23
01/30/98	CY04	4235	79	7:08:12	15:39:08	8:30:56
01/30/98	CY04	4999	44	8:08:58	14:27:56	6:18:58
01/31/98	CY04	4241	88	7:08:11	17:00:03	9:51:52
02/02/98	CY04	4249	80	7:14:49	16:47:38	9:32:49
02/03/98	CY04	4219	94	7:08:23	17:50:18	10:41:55
02/04/98	CY04	4242	76	6:54:23	15:51:39	8:57:16
02/04/98	CY66	0241	85	7:08:54	15:32:55	8:24:01
02/04/98	CY66	0371	85	7:04:50	15:45:25	8:40:35
02/05/98	CY04	4229	84	7:32:53	16:50:09	9:17:16
02/05/98	CY04	4237	87	7:16:26	17:01:44	9:45:18
02/05/98	CY66	0102	84	7:45:59	16:04:26	8:18:27
02/05/98	CY66	0113	88	7:39:42	16:09:23	8:29:41
02/06/98	CY04	4213	80	7:07:13	16:06:13	8:59:00
02/06/98	CY66	0108	105	7:35:20	18:23:14	10:47:54
02/06/98	CY66	0110	95	7:03:59	16:23:09	9:19:10
02/07/98	CY04	4230	81	6:49:48	14:52:50	8:03:02
02/07/98	CY66	0111	94	7:35:13	17:10:38	9:35:25
02/07/98	CY66	0130	69	8:36:13	15:38:11	7:01:58
02/09/98	CY04	4221	96	7:11:28	19:31:24	12:19:56
02/09/98	CY66	0104	94	7:32:29	17:42:23	10:09:54
02/09/98	CY66	0116	87	7:40:41	16:18:58	8:38:17
02/10/98	CY04	4207	90	7:52:09	16:43:11	8:51:02
02/11/98	CY04	4222	89	7:30:16	16:50:13	9:19:57
02/12/98	CY04	4228	95	6:55:45	16:27:47	9:32:02
02/18/98	CY04	4232	97	7:06:57	16:54:51	9:47:54
02/20/98	CY04	4218	79	6:58:50	18:01:16	11:02:26
02/21/98	CY04	4254	17	13:37:03	15:25:22	1:48:19
02/23/98	CY04	4225	91	6:37:04	17:26:20	10:49:16
02/24/98	CY04	4248	84	6:48:58	15:59:30	9:10:32
02/27/98	CY04	4224	88	7:19:09	16:25:59	9:06:50
03/02/98	CY04	4225	86	7:58:38	17:46:15	9:47:37
03/04/98	CY04	4236	83	7:22:37	16:06:23	8:43:46
03/09/98	CY04	4257	97	6:43:22	16:44:14	10:00:52
03/10/98	CY04	4258	81	7:07:23	17:01:10	9:53:47
03/11/98	CY04	4259	90	6:42:48	18:46:15	12:03:27
03/11/98	CY04	4262	92	6:37:40	16:54:26	10:16:46
03/12/98	CY04	4265	87	7:13:14	19:57:58	12:44:44

Attachment to in Response to MPA/USPS-T13-56

03/12/98	CY04	4917	14	16:03:01	20:11:06	4:08:05
03/19/98	CY66	0256	60	7:05:03	18:00:09	10:55:06
03/20/98	CY66	0243	87	7:08:29	16:05:32	8:57:03
04/22/98	CY04	4211	76	8:04:18	16:17:25	8:13:07
04/23/98	CY04	4272	52	8:43:03	13:50:14	5:07:11

1 CHAIRMAN GLEIMAN: Is there anyone else?

2 [No response.]

3 CHAIRMAN GLEIMAN: If not, that brings us to oral
4 cross examination. The following parties have requested
5 oral cross examination: Advo, Inc., the Newspaper
6 Association of America, the Office of the Consumer Advocate,
7 the Periodicals Mailers Group, and United Parcel Service.

8 Is there any other party that wishes to cross
9 examine the witness?

10 [No response.]

11 CHAIRMAN GLEIMAN: If not, Mr. McLaughlin,
12 whenever you're ready, you may proceed.

13 BY MR. McLAUGHLIN [Resuming]:

14 Q Good afternoon, Mr. Raymond. Just a couple of
15 very general -- and these are not tricky questions, just
16 startup questions.

17 The data that you have in Library Reference 163,
18 that was collected as part of a larger project that was
19 known as Engineered Standards or Delivery Redesign; is that
20 correct?

21 A Yes, it was, sir.

22 Q And that had -- there were several different
23 purposes for that broader project, one of which was, for
24 example, to develop Engineered Standards or time standards
25 and things like that; that there were some other purposes

1 to, in fact, make it into later on in confidential sessions;
2 is that correct?

3 A Yes, it had many purposes.

4 Q Okay. And you looked at a lot of different routes
5 in a number of different cities?

6 A Correct.

7 Q I'd like to refer you to page 14 of your
8 testimony, lines 5 and 6.

9 A Okay.

10 Q There you state -- this was filed, by the way, on
11 January 12th, is that correct?

12 A Yes.

13 Q You state there, and I quote, "Over the course of
14 the project 844 route days of street information was
15 collected through one day and multiple day studies of
16 routes."

17 Do you see that statement?

18 A Yes.

19 Q Is that a correct statement?

20 A Yes.

21 Q What do you mean by "over the course of the
22 project" 844 route days of information was collected? What
23 project are you referring to there?

24 A The Delivery Redesign Engineered Standards
25 Project.

1 Q So it is your statement that during the course of
2 the Delivery Redesign Project 844 route days of information
3 were collected?

4 A Yes.

5 Q Could you turn to your response to ADVO
6 Interrogatory 16?

7 There you were asked about changes that were made
8 in the dataset and in response to part (c) of that question,
9 you make the statement, "No full route days were purged."

10 Is that a correct statement?

11 A Using my definition of "purge" at this point in
12 time in developing my testimony, yes, I feel that that was a
13 correct answer.

14 Q What do mean by using your definition of "purged"?
15 How do you define the word "purge"?

16 A The dataset that I am referring to in my testimony
17 is the dataset that was given to Witness Baron, of which
18 there were 844 route days worth of data that pertains to
19 this testimony.

20 Q In other words, you are saying that of the data
21 that was given to Witness Baron, within that dataset no full
22 records were purged?

23 A Correct.

24 Q Isn't that almost a tautology? What you are
25 saying is the records you gave to Witness Baron did not have

1 anything that you didn't give to Witness Baron?

2 A Do me a favor and see if you could rephrase your
3 question so I might be able to grasp what your intent of the
4 question is, please.

5 Q Were any records purged from the database before
6 you gave it to Mr. Baron?

7 A There are a significant number of records in the
8 database that are outside of the scope of the information
9 that was requested by Mr. Baron, so the dataset that Mr.
10 Baron ended up with was 844 route days worth of data but the
11 study was much larger in its capacity or mass of information
12 that was collected.

13 Q So in fact there were more than 844 days of data
14 that were collected?

15 A In the total study, yes, there were more than 844
16 days worth of data in the total study that was collected.

17 Q Let's go back -- I don't want to beat this to
18 death -- back to your testimony in 14 where you say, "Over
19 the course of the project 844 route days of street
20 information was collected."

21 Isn't it correct that more than 844 days of street
22 time data was collected over the course of the project?

23 A We were given a definition of what a street time
24 set of records was supposed to represent so that if in
25 looking at our records there will be some additional days'

1 worth of data in the entire dataset that were outside the
2 scope of the records that were requested for the street time
3 survey.

4 Q Mr. Raymond, can you point to me where in your
5 initial testimony you discuss any criteria that were given
6 to you or that you discussed with Witness Baron about what
7 kinds of route data should be included in the database and
8 what kinds of route data should be included in the database
9 and what kinds of route data should not be included in the
10 database?

11 That is not in your testimony, is it?

12 A No. I did not specify which other records are in
13 the entire database that were left out of the dataset. I
14 only have described the data that was given to Witness
15 Baron.

16 Q And when asked if any records had been purged, you
17 said no records were purged?

18 A Records have not been purged from our database.
19 The records are still in the database.

20 Q What do you mean by your database? Are you
21 referring to the ES database or are you referring to the
22 Library Reference 163 database?

23 A I am referring to the entire database.

24 Q I'm still confused. You say no records were
25 purged from the entire database. What do you mean by that?

1 When you say entire database, are you referring to the
2 entire ES database beyond what was provided to Witness
3 Baron?

4 A Yes, and I said my testimony refers to the
5 database that was given to Witness Baron.

6 Q Weren't those omitted records that were not
7 included in the information given to Baron, weren't they in
8 essence "purged" from the ES database that was given to
9 Witness Baron?

10 A No, I do not feel that they were "purged" from the
11 database. They were not given to Witness Baron in the
12 beginning.

13 Q Where did you tell us that there were additional
14 observations that had not been included?

15 A I say my testimony refers to the dataset that was
16 given to Witness Baron.

17 Q Please refer to your response to MPA-48. This
18 response I believe was filed by you or filed by the Postal
19 Service on March 2nd? Do you see that?

20 [Pause.]

21 BY MR. McLAUGHLIN:

22 Q The question -- do you have that?

23 A I haven't been able to find it yet. It's probably
24 in here somewhere.

25 THE WITNESS: For some reason I seem to be having

1 difficulty finding Number 48.

2 MR. McLAUGHLIN: Is it possible for counsel to
3 provide him with a copy?

4 [Pause.]

5 BY MR. McLAUGHLIN:

6 Q There you were asked by MPA to state whether any
7 records made during the course of the study were purged from
8 the dataset and to please state how many records were purged
9 from the dataset.

10 Your answer in the first sentence was, "Records
11 were purged from the database." Do you see that?

12 A But I think I have an opportunity to say that
13 maybe here's another one that I need to make a correction
14 on, because the original dataset that we have has all the
15 records in it that were made from the field entries. They
16 were not purged.

17 Records were modified but they were not purged.

18 Q If you look at MPA-48, it refers to records made
19 during the course of the study and then it refers to whether
20 they were purged from the dataset. Isn't there a
21 distinction there between the study and the dataset?

22 A Maybe I was confused at this point, but I look at
23 the study as I am going through these interrogatories and I
24 may have got confused between what is in the entire
25 engineering dataset. You stated that you have been

1 confused. I, likewise, may get confused at times. I, in
2 preparing this, was referring to the study that was done and
3 the data that was given to Mr. Baron.

4 Q Well, I might say -- I know Mr. Chairman is not
5 here -- we were also quite surprised to find very late on
6 that apparently, contrary to our earlier understandings,
7 there was data not included in the dataset that had been
8 collected.

9 When was the -- you say in response to MPA-48, "A
10 count of these records that were purged from the database
11 were not maintained."

12 Now what did you mean by that?

13 Do you know how many total records were collected
14 during the course of the ES study and do you know how many
15 were given to Witness Baron?

16 A There were 39,046 records that were given to
17 Witness Baron. Okay? I believe that is the number of
18 records that was stated.

19 Now if I look at our information that we have, we
20 have manual records of records that were modified based upon
21 requested edits from the data collection process that was
22 done in the field between the field and our data
23 coordinators.

24 These records -- I say the records exist in the
25 database, the records that were modified in the database,

1 but we don't go around dropping records out of the database,
2 and sometimes I do get confused when I am referring to which
3 study I am referring to in answering these interrogatories.

4 Q Well, believe me, we thought we understood what we
5 were dealing with and now we suddenly find we don't.

6 Please turn to ADVO, your response to ADVO Number
7 32.

8 A Yes.

9 Q Do you have that?

10 COMMISSIONER LeBLANC: Mr. McLaughlin, that was
11 32?

12 MR. McLAUGHLIN: Yes, Advo-32.

13 COMMISSIONER LeBLANC: Thank you.

14 THE WITNESS: I found it.

15 BY MR. McLAUGHLIN:

16 Q Okay. Now, Advo filed this question on March
17 15th. We received the response on April 28th, which was 44
18 days after we asked it, 30 days beyond the date it was due.
19 We there asked, referring to some information you gave in
20 response to MPA-16, to explain a disparity between the
21 number of carrier routes that showed up and your response to
22 MPA-16 identifying observers, and the total number of routes
23 in your database in LR 193, do you recall that?

24 A Yes, I am reviewing the question.

25 Q Well, the question noted that your testimony

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

loading dock. The next step is to open the back of the vehicle and load in trays and tubs of mail along with the parcels. Other activities at the vehicle include loading trays of mail into the passenger side of the vehicle, organizing and prepping mail in the vehicle.

(b - c) Based on my observations, the carrier receives the Priority and/or Express mail from a roving accountable person/desk or by going to an accountable cage. Typically, the carrier cases these products with the other cased mail in delivery sequence. There are occasions where the carrier completes USPS form 3883 in the office that will allow a customer to sign one form and receive multiple pieces. Priority and Express mail are sorted in the office not in the vehicle.

(d) Letters are delivered to the carriers casing area. Approximately four feet of non-DPS letters are placed on the ledge of the casing equipment for the carrier to start casing upon arrival at the case. As the sorting/casing of letters into delivery sequence continues the carrier will replenish the supply of non-DPS letters on the ledge from tubs/trays of mail that have been delivered to the carrier work station/case. All letters are sorted into delivery sequence in the station (except mail for delivery at centralized locations, "jackpotting", and DPS letters). The carrier-sequenced mail and DPS letters are organized in the delivery vehicle for ease of handling at each stop.

RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN

(e) Flats are delivered to the carriers casing area. Based on my observations, approximately six feet of flats are placed in a vertical flat receptacle adjacent to the casing equipment. Additional flats are located in tubs at the carriers' casing area. The carrier will obtain six inches or more of flats from the flat receptacle, place them on her arm, and then start casing into delivery sequence. As the sorting of flats continues, the carrier will replenish the supply of flats from the vertical flat receptacle or from tubs of flats at the carrier work station/case. All addressed flats are sorted into delivery sequence in the station (except flats for centralized delivery, or "jackpotting.")

(f) Based on my observations, after the carrier has completed the casing of letters and flats, the carrier will walk to a central area and obtain a hamper that contains the parcels for the route. The carrier places the trays/tubs of letters-flats-Express and Priority mail into the hamper on top of the parcels. The hamper is then moved to the clock area and the carrier clocks to the street. The hamper is relocated to the DPS area and trays of DPS are placed on top of the load. The carrier relocates the hamper to the back loading dock, goes and obtains the vehicle, or relocates the hamper directly to the vehicle. Typically, due to the small number, the carrier does not sort parcels.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN**

(g) During the vehicle loading process the carrier places the parcels in the vehicle in route-zone groupings. The carrier remembers where the first parcel is to be delivered. When collecting the first parcel for delivery, the carrier checks to see where the next parcel is to be delivered. As each parcel is collected for delivery the next parcel is checked to determine its delivery address and this process continues until all parcels are delivered.

(h)

(i) The times for these activities are included in street support.

(ii) No. Return trips for parcels are distributed in the same way as return trips for all other mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

POIR No. 8: The Postal Service is requested to provide the information described below to assist in developing a record for the consideration of its request for changes in rates and fees. In order to facilitate inclusion of the required material in the evidentiary record, the Postal Service is to have a witness attest to the accuracy of the answers and be prepared to explain to the extent necessary the basis for the answers at our hearings. The answers are to be provided within 7 days.

The Postal Service collected extensive tally data on city delivery carrier street activities as part of the Engineered Standards/Delivery Redesign project headed by witness Raymond. For reasons described in Presiding Officer's Ruling No. R2000-1/35, the Postal Service is asked to provide an in-depth discussion of how it identifies categories of carrier activity that are reflected in the more commonly occurring tally types. It is also asked to thoroughly articulate the general guidelines that its witnesses followed in assigning the activities associated with the more commonly occurring tally types to the STS categories of *street time activity*.

RESPONSE:

Library Reference USPS LR-I-163, contains the outside work sampling data used by witness Baron in this proceeding. In this library reference, 19 fields are associated with each of the 39,046 rows of data provided. Twelve of these fields (Level 10, Location with code, Level 11.1, Personal & Administrative with code, Level 11.2, Delivery type with code, Level 11.3, Delivery Type Status with code, Level 11.4, Outside Activity with code, Level 11.4.1, Activity Detail with code) constitute the outside work sampling portion of a carrier's day. The remaining 7 fields (which ultimately included an STS category label and code) allow for linking the rows of data back to the specific location, route, observer, job classification of the carrier observed, dates and times.

The following general steps were taken to classify each of the rows of data into the STS categories used by witness Baron: The first step was to create a frequency distribution of each of the actual combinations of the 12 work sampling

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

fields of the 39,046 rows of data. This distribution has been provided in Library Reference USPS LR-I-281. This process reduced the 39,046 individual rows of data down to 1,350 rows of data with the frequency counts.

The following are two examples of rows of data from the frequency distribution:¹

Code	Location	Code	Personal & Admin	Code	Delivery Type	Code	Delivery Status	Code	Activities	Code	Activity Detail	Frequency Count
L12	Point Of Delivery	A00	N/A	WT02	Curb	S04	Resident Outside	J06	Del/Col.	H06	#1 Box	3635
L08	Vehicle	A00	N/A	WT02	Curb	S04	Resident Outside	T02	Travel Bet Dvr.	K01	LLV	3501

The first row identifies that the carrier was located at the Point of Delivery, the carrier was not performing any Personal or Administrative functions (N/A), the Delivery Type was Curb, the Delivery Status was Resident Outside, the carrier was performing the activity of Delivering and/or Collecting the mail, and the Activity Detail identifies that the point of delivery was a #1 Rural Box.

There are 3,635 records out of the 39,046 records in the database that have this combination of work sampling scans. Each of these 3,635 rows are identical with respect to the 12 work sampling fields. The categorization process would focus principally on these twelve fields, and, on infrequent occasions, would refer to the remaining fields and underlying records when necessary to confirm the correctness of the STS categorization.

The next step in the classification process was to manually compare the definitions of the six STS categories to a particular row of data, and judgmentally

¹ Due to space limitations on this 8 ½ by 11 inch page, it was not possible to display all 19 fields. In any event, as will be seen in what follows, the key information for STS classification generally can be found in the 12 fields displayed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

assign the STS category that matched. Contrary to the impression in the minds of some, a computer did not perform the classification function.

The six category definitions that were used were:

1. **Load time:** "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and the providing of special services."
2. **Street Support time:** "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes."
3. **Driving time:** "Driving vehicles on all portions of letter routes other than the curblin portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it."
4. **Route/Access FAT time:** "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces."
5. **Route/Access CAT time:** "Vehicle driving time on the curblin portions of routes. Also includes the time spent driving up to curblin stops to load mail into and to collect mail from customer boxes."
6. **Collection time:** "The time spent walking up to and sweeping Express mail and non-Express mail collection boxes. The time spent driving vehicles up to the collection stops is included in Driving Time, as discussed above."

In many cases, the comparison to STS category definitions and assignment of an STS category was a fairly straightforward process. For example, consider the first row of data from the table above. The location **Point of Delivery** means the carrier has completed traveling to/accessing the delivery point. The activity **Delivery/Collect**, means that the carrier is engaged in one of several possible activities: obtaining the mail from the vehicle/satchel/hand/arm, fingering the mail for confirmation of address correctness, opening/closing the

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

mail box, placing the mail into the #1 Box, and/or collecting the mail in the box and placing it into the collected mail container. Absent any contradictory information in the remaining fields, this row falls neatly within the STS definition of Load Time: "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and the providing of special services." None of the entries in any of the fields would lead to placement in any other STS category. The facts that the delivery type was **Curb**, and that the activity detail indicates a #1 Box, support the classification. For this reason, these 3,635 tallies were assigned an STS code 1, for Load Time.

As another example, consider the 3,501 records represented by the second row in the table above. The entries in this tally group show that the carrier was in the **Vehicle**, and was not performing any Personal or Administrative functions (N/A). It shows that the Delivery Type was **Curb**, that the Delivery Status was **Resident Outside**, and that the carrier was performing the activity of **Traveling Between Delivery Points**, in an LLV. The combination of **Vehicle**, **Traveling Between Delivery Points**, and **Curb** provides a solid indication that these tallies fall within the definition of Route/Access CAT time: "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." Absent any conflicting entries in the remaining fields, these 3,501 records were assigned the STS code of 5, for Route/Access CAT time. The fact the carrier was serving **Resident Outside** deliveries, and was using an

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

LLV for delivery are additional supporting information in selecting the assignment of this row of data to the STS category of Route/Access CAT time.

This categorization process was painstakingly followed for every one of the 1,350 rows of data produced by the initial frequency distribution. After each of the 1,350 rows of data had gone through this process, another frequency distribution was produced placing all of the 1,350 rows that had been assigned to 1. Load Time, 2. Street Support, 3. Driving Time, 4. Route/Access Fat, 5. Route Access Cat, and 6. Collection Time, into a descending frequency-count arrangement by the STS categories. Library Reference USPS LR-I-281 includes this categorized frequency distribution in addition to the frequency distribution used at the beginning of the process. When the categorized frequency distribution was completed, it was used to double check the assigned STS codes. Again, each of the 1,350 individual rows was carefully reviewed to ensure that it met the appropriate STS definition.

Once each of the categorizations were finalized, a computer was used to expand the 1,350 rows back into 39,046 individual tallies, each tally now containing its associated STS code. This database with the 39,046 rows of work sampling data was now ready for presentation to witness Baron.

These specific examples of the more routine classification tasks described above provide insight into the general technique. Later in this response, I will provide many other specific examples to flesh out the process. Although the process proceeded on a tally group by tally group basis, however, I will now also attempt to provide some general guidelines underlying the procedure.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

In general, and especially among the more common tally types, there are two to three work sampling fields whose entries tend to determine the appropriate STS category, with an additional three or four fields providing information to support the classification. On some occasions, particularly with respect to the less frequently occurring tally types, additional information was used to verify the placement into the appropriate STS category.

In the following, I will attempt to indicate for each of the six STS categories, which of the tally fields played important roles, and suggest general classification rules that were implicit in our tally-type by tally-type analysis:

Load time

In general, the presence of Activity: **Delivery/Collection or Finger @**

Delivery is a strong indication that the appropriate STS category is Load time. This rule was not appropriate on some occasions. For example, there are approximately 30 tallies in which the entry Location: **Relay Box** required the tally to be placed in the Street Support category instead of Load time despite the entry of Activity: **Delivery/Collection or Finger @ Delivery**. For another example, there are approximately 30 tallies in which the entry Location: **Collection Box** required the tallies to be placed in the STS category Collection time.

Street Support time:

In general, the presence of Activity of **Loading, Unloading, Setup, Travel to 1ST Delivery Point, or Return to Unit** is a strong indicator that the appropriate

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8

STS category is Street Support time. However, if the Location was **Collection Box**, then the appropriate category is generally **Collection time**.

Driving time:

In general, the presence of Activity: **Travel Between Deliveries**, in combination with Delivery Type: **Central** or **Dismount** strongly indicates **Driving time**.

In general, if the Delivery Type is **Park and Loop**, and Location indicates that the carrier is in the vehicle (i.e. **Vehicle, In Vehicle at Stop, On Route, Park Point**), then **Driving time** is also indicated. There are important exceptions, however. For example, if, in addition to **Park and Loop** and **Vehicle**, Activities **Loading, Unloading, Setup, Travel to 1ST Delivery Point, or Return to Unit** are present, then **Street Support** is indicated.

Route/Access FAT time

In general, the combination of Activity: **Travel Between Deliveries**, with Delivery Types of **Foot Route, Park & Loop, Dismount, or Central Delivery**, with Activity Detail involving walking (i.e., **Walk Flat, Walk Obst, Walkg, Push Cart**) is sufficient to place scans into this category.

Note that a Delivery Type of **Curb** generally indicates **Route/Access CAT time**.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

Route/Access CAT time:

In general, the combination of Delivery Type: **Curb**, along Activity: **Travel Between Deliveries** is sufficient to place tallies into the Route/Access CAT time category. Note that when Activity is **Parcel** or **Accountable**, and the Activity Detail indicates **LLV** or **Jeep**, the tally remains in CAT because the carrier is still traveling between deliveries with those pieces of mail.

Collection time:

In general, Location: **Collection Box** and Activity: **Wait 4 Collectn** are strong indicators that the tallies should be placed into the Collection time category.

The twelve fields noted earlier in this response (and when necessary, the observers' comments logs, and/or the Postal Service form 3999X, and/or, in extremely rare cases, field-produced work sampling reports, to check the observers' edits or comments) were generally more than adequate to enable the assignment of the 1,350 actual combinations into the STS categories. While this was not always simple, it was not a forced fit. The STS definitions were "naturally occurring" categories based on a 1986 work sampling. It is not surprising that the actual observations contained in the ES database used by witness Baron also tended to coalesce into major groupings of frequently-occurring tally configurations that conformed to the STS groupings.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

In the attachment to this response, to flesh out the categorization process used, I have prepared tally-group by tally-group descriptions of the key considerations underlying the STS classifications for almost 36,000 tallies, most of them being frequently occurring types. These tally groups represent over 90 percent of all of the data used by witness Baron.

In the descriptions provided, it can be seen that the STS categorizations were not always as straightforward as the general rules outlined earlier would seem to imply. For example, the fifth of the tally types on page 5 of 40 of the initial, uncategorized frequency distribution contained in LR-I-281 (the second of the two distributions in the library reference), represents 35 tallies with the following characteristics:

Location: On Route; Personal and Administrative: N/A; Delivery Type: Central; Delivery Type Status: Resident Outside; Activity: Travel B/t Divr; Activity Detail: LLV

It can be seen that carrier is located "On Route." This entry, combined with the activity of "Traveling between Deliveries (Travel B/t Divr.) and with the delivery type, Central, leaves open the possibility that either Driving time or Route/Access FAT is the appropriate STS classification. Note, however, that the record does not indicate a curb delivery, so the category Route/Access CAT time can be eliminated. In order to determine the appropriate STS classification, at least one additional piece of information is required. In this case, the final piece required in this record is the activity detail of "LLV." This detail places the carrier in the vehicle, consistent with Driving time. (If the detail had indicated walking, the tally might have been placed in STS category Route/Access FAT time). The

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 8**

remaining portions of the record provide more supporting information, indicating that the carrier was outside in the vehicle. This example demonstrates that usually, the less frequently occurring the tally configuration, the more information was needed to make a definitive classification.

The list of tally group analyses follows.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
3635	L12 Point of Deliver	A00 N/A	Code Activities WT02 Curb J08 Del/Coll.	Code Activity Detail S04 Resident Outside H06 # 1 Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points. The mailbox type is the most common curb box in the United States, a #1 box. Based on the definition this information is supportive in determining the STS category.</p>				
3501	L08 Vehicle	A00 N/A	WT02 Curb T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
<p>STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these data points the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to start the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries. The definition is now complete. The carrier is using the LLV to travel between deliveries and on the residential outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification, but provide a better definition as the mode of travel.</p>				
2474	L12 Point of Deliver	A00 N/A	WT05 Central J08 Del/Coll.	S04 Resident Outside H13 Central Outside
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, in a residential neighborhood of outside delivery points. Based on the definition this information is supportive in determining the "load time" classification.</p>				
1573	L13 On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.</p>				
986	L08 Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time". The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential outside portion of the route.</p>				
899	L12 Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H11 Gang Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a gang box. Based on the definition this information is supportive in determining the "load time" classification.</p>				
895	L13 On Route	A00 N/A	WT03 Park & Loop T03 Trav B/t w/sort	S04 Resident Outside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries and fingering or sorting the mail as the activity. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.</p>				
788	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H09 1 Hand Slam
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Park & Loop type delivery, in a residential neighborhood of outside delivery points using a one-hand slam method. Based on the definition this information is supportive in determining the "load time" classification.</p>				

Number of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery Type	Status
					Code Activities		Code Activity Detail		

780	L12	Point of Deliver	A00	N/A	WT05	Central	S03	Resident Inside	
					J08	Del/Coll.	H12	Central Inside	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, in a residential neighborhood of inside delivery points to a central type box. Based on the definition this information is supportive in determining the "load time" classification.

665	L08	Vehicle	A00	N/A	WT05	Central	S04	Resident Outside	
					T02	Travel B/t Dvr.	K01	LLV	

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential outside portion of the route.

654	L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	
					J12	Finger @ Deliver	H06	# 1 Box	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger at Deliver." is also consistent with the "load time" definition as the action of sorting mail at the delivery point. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a #1 type box. Based on the definition this information is supportive in determining the "load time" classification.

654	L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	
					J08	Del/Coll.	H07	# 1-1/2 Box	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a #1-1/2 type box. Based on the definition this information is supportive in determining the "load time" classification.

598	L14	P B L	A02	Sbj Break	WT02	Curb	S00	N/A	
					T00	N/A	H00	N/A	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. That is a break cannot be assigned to any of the other STS categories.

549	L12	Point of Deliver	A00	N/A	WT04	Dismount	S01	Business Inside	
					J08	Del/Coll.	H10	Drop to Cust	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services" The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the inside business delivery portion of a route. The load time definition is further supported by the "Drop to Cust" activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". Based on the definition this information is supportive in determining the "load time" classification.

488	L08	Vehicle	A00	N/A	WT04	Dismount	S01	Business Inside	
					T02	Travel B/t Dvr.	K01	LLV	

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business inside delivery type portion of the route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

469	L08 Vehicle	A00 N/A	WT02 Curb J11 Setup	S04 Resident Outside K01 LLV
-----	-------------	---------	------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery. The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb route.

451	L08 Vehicle	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
-----	-------------	---------	--	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential outside delivery type portion of the route.

445	L13 On Route	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S04 Resident Outside K10 Walk Flat
-----	--------------	---------	---------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.

431	L13 On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K09 Walking
-----	--------------	---------	--	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "walking" provides some additional information about the conditions the carrier faces.

405	L08 Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K01 LLV
-----	-------------	---------	-------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery. The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a park and loop route.

358	L08 Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S02 Business Outside K01 LLV
-----	-------------	---------	---------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of vehicle we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business outside delivery type portion of the route.

337	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Col.	S04 Resident Outside H06 # 1 Box
-----	----------------------	---------	-------------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services". The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Col." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route to a #1 type mailbox. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
		Code Activities		Code Activity Detail

312	L12 Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H08 # 2 Box
-----	----------------------	---------	----------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services". The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route to a #2 type mailbox. Based on the definition this information is supportive in determining the "load time" classification.

309	L08 Vehicle	A00 N/A	WT02 Curb T04 Return to Unit	S04 Resident Outside K01 LLV
-----	-------------	---------	---------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Return to Unit" satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, returning from the residential outside portion of a curb route.

288	L13 On Route	A00 N/A	WT02 Curb T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
-----	--------------	---------	-----------------------------------	---------------------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel B/t Divr.). The definition is now complete. The carrier is using the LLV to travel between deliveries and on the residential outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification and provide a better definition as the mode of travel.

276	L14 P B L	A02 Sbj Break	WT03 Park & Loop T00 N/A	S00 N/A H00 N/A
-----	-----------	---------------	-----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. That is a break cannot be assigned to any of the other STS categories.

256	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H11 Gang Box
-----	----------------------	---------	--------------------------------	--------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, in a residential neighborhood of outside delivery points to a gang box. Based on the definition this information is supportive in determining the "load time" classification.

251	L09 Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K01 LLV
-----	----------------	---------	-------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at a park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a park and loop route.

247	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H06 # 1 Box
-----	----------------------	---------	-----------------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop type delivery, in a residential neighborhood of outside delivery points to a #1 type mailbox. Based on the definition this information is supportive in determining the "load time" classification.

233	L14 P B L	A02 Sbj Break	WT04 Dismount T00 N/A	S00 N/A H00 N/A
-----	-----------	---------------	--------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. That is a "break" cannot be assigned to any of the other STS categories.

Number of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery Type	Status
-------------------	------	----------	------	----------	------	---------------	------	---------------	--------

					Code Activities	Code Activity Detail
228	L08	Vehicle	A00	N/A	WT02 Curb J09 Loading	S00 N/A K01 LLV

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb route.

225	L08	Vehicle	A00	N/A	WT05 Central J11 Setup	S04 Resident Outside K01 LLV
-----	-----	---------	-----	-----	---------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at a park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a central type delivery route.

217	L12	Point of Deliver	A00	N/A	WT02 Curb J12 Finger @ Deliver	S04 Resident Outside H11 Gang Box
-----	-----	------------------	-----	-----	-----------------------------------	--------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver." (fingering of sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, in a residential neighborhood of outside delivery points to a gang box. Based on the definition this information is supportive in determining the "load time" classification

215	L12	Point of Deliver	A00	N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H02 1 Handed Slot
-----	-----	------------------	-----	-----	-----------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop type delivery, in a residential neighborhood of outside delivery points to a one-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification

215	L08	Vehicle	A00	N/A	WT02 Curb T04 Return to Unit	S00 N/A K01 LLV
-----	-----	---------	-----	-----	---------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Return to Unit" satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, returning from the portion of a curb route.

214	L13	On Route	A00	N/A	WT03 Park & Loop T03 Trav B/t w/sort	S04 Resident Outside K09 Walking
-----	-----	----------	-----	-----	---	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries while sorting or fingering the mail as the activity(Travel B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walking" provides some additional information about the conditions the carrier faces.

208	L13	On Route	A00	N/A	WT03 Park & Loop T02 Travel B/t Dvr.	S04 Resident Outside K11 Walk Obst
-----	-----	----------	-----	-----	---	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity(Travel B/t Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Obst" (Walking Obstructed) helps provide some additional information about the conditions the carrier faces.

203	L12	Point of Deliver	A00	N/A	WT05 Central J08 Del/Coll.	S02 Business Outside H13 Central Outside
-----	-----	------------------	-----	-----	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, to a business outside delivery point to central outside type of mailboxes. Based on the definition this information is supportive in determining the "load time" classification

Number of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery Type	Status
-------------------	------	----------	------	----------	------	---------------	------	---------------	--------

					Code Activities	Code Activity Detail
203	L08	Vehicle	A00	N/A	WT04 Dismount J11 Setup	S04 Resident Outside K01 LLV

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at a park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a dismount type delivery route.

201	L08	Vehicle	A00	N/A	WT02 Curb T01 Travel To 1 Divr	S04 Resident Outside K01 LLV
-----	-----	---------	-----	-----	-----------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery on a residential outside portion of a curb route.

196	L08	Vehicle	A00	N/A	WT02 Curb T01 Travel To 1 Divr	S00 N/A K01 LLV
-----	-----	---------	-----	-----	-----------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a curb route.

196	L12	Point of Deliver	A00	N/A	WT02 Curb J12 Finger @ Deliver	S04 Resident Outside H07 # 1-1/2 Box
-----	-----	------------------	-----	-----	-----------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, to a residential outside delivery point to a #1-1/2 size mailbox. Based on the definition this information is supportive in determining the "load time" classification

180	L14	P B L	A02	Sbj Break	WT05 Central T00 N/A	S00 N/A H00 N/A
-----	-----	-------	-----	-----------	-------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. The "break" cannot be assigned to any of the other STS categories.

180	L12	Point of Deliver	A00	N/A	WT03 Park & Loop J08 Del/Coll.	S01 Business Inside H10 Drop to Cust
-----	-----	------------------	-----	-----	-----------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop type delivery, to a business inside delivery point and handing or dropping the mail to the customer. Based on the definition this information is supportive in determining the "load time" classification.

173	L12	Point of Deliver	A00	N/A	WT05 Central J12 Finger @ Deliver	S04 Resident Outside H13 Central Outside
-----	-----	------------------	-----	-----	--------------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, to a residential outside delivery point(s) of a group of central boxes. Based on the definition this information is supportive in determining the "load time" classification

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

167	L12	Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H09 1 Hand Slam
-----	-----	------------------	---------	--------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, to a residential outside delivery point and is placing the mail into a one-hand slam type of mailbox. Based on the definition this information is supportive in determining the "load time" classification.

166	L08	Vehicle	A00 N/A	WT02 Curb J08 Del/Coll.	S04 Resident Outside H06 # 1 Box
-----	-----	---------	---------	----------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Vehicle", this is not enough information to determine the category. The activity of "Del/Coll." (Deliver and collect) is consistent with the "load time" definition. The delivery type of "curb" is the final piece needed to verify the carrier is delivering the mail to a curb delivery point. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a residential outside type delivery and placing the mail into a #1 mailbox. Based on the definition this information is supportive in determining the "load time" classification.

148	L13	On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S01 Business Inside K10 Walk Flat
-----	-----	----------	---------	--	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" helps provide some additional information about the conditions the carrier faces.

142	L08	Vehicle	A00 N/A	WT02 Curb T02 Travel B/t Divr.	S04 Resident Outside K00 Jeep
-----	-----	---------	---------	-----------------------------------	----------------------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece needed to apply the "CAT" classification is the Activity of traveling between deliveries (Travel B/t Divr.). The definition is now complete. The carrier is using the jeep to travel between deliveries and on the residential outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification and provides a better definition as the mode of travel.

142	L12	Point of Deliver	A00 N/A	WT04 Dismount F02 Parcel	S04 Resident Outside H10 Drop to Cust
-----	-----	------------------	---------	-----------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location "Point of Deliver", this is consistent with the "load time" definition. The activity detail of "Drop to Cust" (Drop to customer) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a dismount type delivery, on the residential outside delivery portion of a route. The load time definition is further supported by the "Drop to Cust" activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts".

141	L13	On Route	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S02 Business Outside K10 Walk Flat
-----	-----	----------	---------	---------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and the activity detail of "Walk Flat" provides some additional information about the conditions the carrier faces.

141	L12	Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S02 Business Outside H10 Drop to Cust
-----	-----	------------------	---------	--------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route.

135	L14	P B L	A01 Sbj Personal	WT02 Curb T00 N/A	S00 N/A H00 N/A
-----	-----	-------	------------------	----------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. That personal break cannot be assigned to any of the other STS categories.

Number Type Status of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery
-------------------------------------	------	----------	------	----------	------	---------------	------	----------

Code Activities

Code Activity Detail

134	L13	On Route	A00	N/A	WT01	Foot	S04	Resident Outside
					T02	Travel B/t Divr.	K10	Walk Flat

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries as the activity(Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

134	L13	On Route	A00	N/A	WT04	Dismount	S01	Business Inside
					T02	Travel B/t Divr.	K10	Walk Flat

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries as the activity(Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

133	L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside
					J08	Del/Coll.	H02	1 Handed Slot

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, in a residential neighborhood of outside delivery points to a one-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification

129	L12	Point of Deliver	A00	N/A	WT05	Central	S01	Business Inside
					J08	Del/Coll.	H12	Central Inside

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, in a business that has an inside central type of delivery points. Based on the definition this information is supportive in determining the "load time" classification

128	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside
					T02	Travel B/t Divr.	K00	Jeep

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curbline portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portion of the record provide more supporting information, the carrier was driving a jeep on the residential outside delivery type portion of the route.

124	L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside
					J08	Del/Coll.	H10	Drop to Cust

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

123	L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside
					J08	Del/Coll.	H05	Flat Receptacle

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood of outside delivery points to a flat receptacle. Based on the definition this information is supportive in determining the "load time" classification

Number of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery Type Status
-------------------	------	----------	------	----------	------	---------------	------	----------------------

					Code Activities	Code Activity Detail
121	L12	Point of Deliver	A00	N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H10 Drop to Cust

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

118	L13	On Route	A00	N/A	WT04 Dismount F02 Parcel	S04 Resident Outside K10 Walk Flat
-----	-----	----------	-----	-----	-----------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is delivering a parcel. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

117	L12	Point of Deliver	A00	N/A	WT04 Dismount F01 Accountable	S04 Resident Outside H10 Drop to Cust
-----	-----	------------------	-----	-----	----------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route.

116	L08	Vehicle	A00	N/A	WT04 Dismount J11 Setup	S01 Business Inside K01 LLV
-----	-----	---------	-----	-----	----------------------------	--------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Business Inside" portion of a dismount type delivery route.

112	L12	Point of Deliver	A00	N/A	WT02 Curb F02 Parcel	S04 Resident Outside H10 Drop to Cust
-----	-----	------------------	-----	-----	-------------------------	--

STS Classification Load-Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

106	L08	Vehicle	A00	N/A	WT04 Dismount J11 Setup	S02 Business Outside K01 LLV
-----	-----	---------	-----	-----	----------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Business Outside" portion of a dismount type delivery route.

104	L08	Vehicle	A00	N/A	WT03 Park & Loop T02 Travel B/T Divr.	S04 Resident Outside K00 Jeep
-----	-----	---------	-----	-----	--	----------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter route other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/T Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portion of the record provide more supporting information, the carrier was driving a jeep on the residential outside delivery type portion of the route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail
99	L08 Vehicle	A00 N/A	WT02 Curb J09 Loading	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb route.</p>				
98	L08 Vehicle	A00 N/A	WT05 Central T04 Return to Unit	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a central type route.</p>				
88	L14 P B L	A01 Sbj Personal	WT04 Dismount T00 N/A	S00 N/A H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform an activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. That "personal break" cannot be assigned to any of the other STS categories.</p>				
87	L14 P B L	A01 Sbj Personal	WT03 Park & Loop T00 N/A	S00 N/A H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform an activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. That "personal break" cannot be assigned to any of the other STS categories.</p>				
86	L08 Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Dvr	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a residential outside portion of a dismount route.</p>				
85	L12 Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H10 Drop to Cust
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is also consistent with the "load time" definition. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, on the residential outside delivery portion of a route.</p>				
84	L08 Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Dvr.	S00 N/A K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the route.</p>				
84	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S04 Resident Outside H03 2 Handed Slot
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood outside delivery points to a two-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification.</p>				

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

83	L13	On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S02 Business Outside K10 Walk Flat
----	-----	----------	---------	--	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "park and loop" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

81	L13	On Route	A00 N/A	WT03 Park & Loop T03 Trav B/t w/sort	S04 Resident Outside K11 Walk Obst
----	-----	----------	---------	---	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park and Loop" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Obst" (walking obstructed) provides some additional supporting information about the conditions the carrier faces.

80	L08	Vehicle	A00 N/A	WT04 Dismount J09 Loading	S00 N/A K01 LLV
----	-----	---------	---------	------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on dismount portion of a route.

79	L13	On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S04 Resident Outside K10 Walk Flat
----	-----	----------	---------	--------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

78	L08	Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Divr	S00 N/A K01 LLV
----	-----	---------	---------	---------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV traveling to the first delivery of a dismount route.

75	L13	On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S03 Resident Inside K10 Walk Flat
----	-----	----------	---------	--------------------------------------	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Inside" and the activity detail of "Walk Flat" helps provide some additional supporting information about the conditions the carrier faces.

74	L08	Vehicle	A00 N/A	WT05 Central T01 Travel To 1 Divr	S00 N/A K01 LLV
----	-----	---------	---------	--------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a Central type route.

73	L08	Vehicle	A00 N/A	WT05 Central T02 Travel B/t Divr.	S02 Business Outside K01 LLV
----	-----	---------	---------	--------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business outside portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

72	L13	On Route	A00 N/A	WT01 Foot T03 Trav Bt w/sort	S04 Resident Outside K10 Walk Flat
----	-----	----------	---------	---------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav Bt w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

71	L08	Vehicle	A00 N/A	WT02 Curb T02 Travel Bt Dvr.	S02 Business Outside K01 LLV
----	-----	---------	---------	---------------------------------	---------------------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblane portions of routes. Also includes the time spent driving up to curblane stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel Bt Dvr.). The definition is now complete. The carrier is using the LLV to travel between deliveries and on the business outside portion of the route. These last two pieces of information are supportive in determining the STS CAT classification and provide a better definition as the mode of travel.

71	L08	Vehicle	A00 N/A	WT03 Park & Loop T01 Travel To 1 Dvr	S00 N/A K01 LLV
----	-----	---------	---------	---	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a Park and Loop type route.

71	L08	Vehicle	A00 N/A	WT02 Curb J10 Unloading	S00 N/A K01 LLV
----	-----	---------	---------	----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, abs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on curb of a route.

70	L07	Dock	A00 N/A	WT02 Curb J09 Loading	S00 N/A K01 LLV
----	-----	------	---------	--------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a curb route.

68	L08	Vehicle	A00 N/A	WT04 Dismount J11 Setup	S04 Resident Outside K00 Jeep
----	-----	---------	---------	----------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Resident Outside" portion of a dismount type delivery route.

67	L08	Vehicle	A00 N/A	WT03 Park & Loop T01 Travel To 1 Dvr.	S04 Resident Outside K01 LLV
----	-----	---------	---------	--	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a "Park and Loop" type route.

67	L08	Vehicle	A00 N/A	WT05 Central J11 Setup	S03 Resident Inside K01 LLV
----	-----	---------	---------	---------------------------	--------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

67	L08 Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K00 Jeep
----	-------------	---------	-------------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a Jeep, on the "Resident Outside" portion of a "Park and Loop" route.

66	L08 Vehicle	A00 N/A	WT03 Park & Loop T04 Return to Unit	S04 Resident Outside K01 LLV
----	-------------	---------	--	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a "Park and Loop" type route.

65	L13 On Route	A00 N/A	WT01 Foot T02 Travel B/A Dvr.	S04 Resident Outside K04 Walkg Push Cart
----	--------------	---------	----------------------------------	---

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/A Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walkg Push Cart" (Walking with a pushcart) helps provide some additional supporting information about the conditions the carrier faces.

65	L08 Vehicle	A00 N/A	WT05 Central T04 Return to Unit	S00 N/A K01 LLV
----	-------------	---------	------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in LLV return from a "Central" type route.

65	L09 Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K00 Jeep
----	----------------	---------	-------------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the "Resident Inside" portion of a "Park & Loop" type delivery.

63	L12 Point of Deliver	A00 N/A	WT02 Curb J12 Finger @ Deliver	S04 Resident Outside H08 #2 Box
----	----------------------	---------	-----------------------------------	------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, to a residential outside delivery point and is placing the mail into a #2 mailbox. Based on the definition this information is supportive in determining the "load time" classification.

62	L08 Vehicle	A00 N/A	WT05 Central J09 Loading	S00 N/A K01 LLV
----	-------------	---------	-----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a central route.

Number of tallies	Code	Location	Code	Personal	Code	Delivery Type	Code	Delivery Type	Status
					Code	Activities	Code	Activity	Detail

12	L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S04	Resident Outside	
					J08	Del/Coll.	H13	Central Outside	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood of outside delivery types and is loading the mail into a central type box. Based on the definition this information is supportive in determining the "load time" classification.

62	L12	Point of Deliver	A00	N/A	WT03	Park & Loop	S03	Resident Inside	
					J08	Del/Coll.	H12	Central Inside	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a park and loop route type delivery, in a residential neighborhood of inside delivery types and is loading the mail into a central type box. Based on the definition this information is in determining the "load time" classification.

59	L14	P B L	A01	Sbj Personal	WT05	Central	S00	N/A	
					T00	N/A	H00	N/A	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal, break and lunch). The carrier personal code of "A01" "Sbj Personal" is the compensated time the carrier took to perform an activity of a personal nature. Due to the nature of the STS category of Street Support a decision was made to include all carrier personal breaks in this category. A "personal break" cannot be assigned to any of the other STS categories.

57	L08	Vehicle	A00	N/A	WT04	Dismount	S04	Resident Outside	
					T04	Return to Unit	K01	LLV	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV return from a "Resident Outside" portion of a route.

55	L12	Point of Deliver	A00	N/A	WT02	Curb	S04	Resident Outside	
					F01	Accountable	H10	Drop to Cust	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, on the residential outside delivery portion of a route.

55	L08	Vehicle	A00	N/A	WT03	Park & Loop	S00	N/A	
					J09	Loading	K01	LLV	

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a park and loop type route.

55	L12	Point of Deliver	A00	N/A	WT01	Foot	S04	Resident Outside	
					J08	Del/Coll.	H13	Central Outside	

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot type delivery, in a residential neighborhood of outside delivery types and is loading the mail into an outside central type box. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

53	L09	Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside K03 Pickup / Van
----	-----	------------	---------	-------------------------------	--

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an "Pickup/Van", on the "Resident Outside" portion of a "Park & Loop" type delivery.

52	L08	Vehicle	A00 N/A	WT02 Curb J10 Unloading	S04 Resident Outside K01 LLV
----	-----	---------	---------	----------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a curb of a route.

51	L12	Point of Deliver	A00 N/A	WT05 Central J12 Finger @ Deliver	S03 Resident Inside H12 Central Inside
----	-----	------------------	---------	--------------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, to a residential inside delivery point and is placing the mail into a central inside type mailbox. Based on the definition this information is supportive in determining the "load time" classification

51	L08	Vehicle	A00 N/A	WT04 Dismount J09 Loading	S04 Resident Outside K01 LLV
----	-----	---------	---------	------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV at the residential outside portion of a park and loop type route.

50	L08	Vehicle	A00 N/A	WT02 Curb T02 Travel B/t Divr.	S00 N/A K01 LLV
----	-----	---------	---------	-----------------------------------	--------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is in the vehicle. This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the Activity of traveling between deliveries (Travel B/t Divr.). The definition is now complete. The carrier is using the LLV to travel between deliveries of a route. These last two pieces of information are supportive in determining the STS CAT classification, and provide a better definition as the mode of travel.

50	L08	Vehicle	A00 N/A	WT05 Central T02 Travel B/t Divr.	S03 Resident Inside K01 LLV
----	-----	---------	---------	--------------------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the residential inside portion of a route.

48	L08	Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S02 Business Outside K00 Jeep
----	-----	---------	---------	---------------------------------------	----------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a jeep on the outside business portion of a route.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

48	L08	Vehicle	A00 N/A	WT04 Dismount T01 Travel To 1 Dvr	S02 Business Outside K01 LLV
----	-----	---------	---------	--------------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of an outside business dismount type route.

48	L12	Point of Deliver	A00 N/A	WT02 Curb J08 Del/Coll.	S02 Business Outside H06 # 1 Box
----	-----	------------------	---------	----------------------------	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curb type delivery, outside business delivery points with a #1 type mailbox. Based on the definition this information is supportive in determining the "load time" classification

45	L08	Vehicle	A00 N/A	WT03 Park & Loop T02 Travel B/t Dvr.	S01 Business Inside K01 LLV
----	-----	---------	---------	---	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a LLV on the business inside portion of a route.

44	L12	Point of Deliver	A00 N/A	WT04 Dismount J08 Del/Coll.	S04 Resident Outside H02 1 Handed Slot
----	-----	------------------	---------	--------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a dismount type delivery, outside residential delivery points with a one-handed slot type mailbox. Based on the definition this information is supportive in determining the "load time" classification

44	L13	On Route	A00 N/A	WT04 Dismount T05 Walking	S04 Resident Outside K10 Walk Flat
----	-----	----------	---------	------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "walking flat" provides some additional supporting information about the conditions the carrier faces.

44	L12	Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S03 Resident Inside H12 Central Inside
----	-----	------------------	---------	----------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to inside residential delivery points with a central type mailbox. Based on the definition this information is supportive in determining the "load time" classification

43	L08	Vehicle	A00 N/A	WT03 Park & Loop T04 Return to Unit	S00 N/A K01 LLV
----	-----	---------	---------	--	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV returning from a "Park & Loop" portion of a route.

43	L08	Vehicle	A00 N/A	WT04 Dismount T04 Return to Unit	S00 N/A K01 LLV
----	-----	---------	---------	-------------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The activity of "Return to Unit" is consistent with the "traveling to and from the route" from the STS definition. The other portion of the record provides more details in determining the carriers actions. The carrier was in an LLV returning from a "Dismount" portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
-------------------	---------------	---------------	--------------------	---------------------------

			Code Activities	Code Activity Detail
--	--	--	-----------------	----------------------

40	L08 Vehicle	A00 N/A	WT05 Central T01 Travel To 1 Divr	S04 Resident Outside K01 LLV
----	-------------	---------	--------------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the vehicle. The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, traveling to the first delivery of a central type delivery and the residential outside portion route.

38	L07 Dock	A00 N/A	WT02 Curb J10 Unloading	S00 N/A K01 LLV
----	----------	---------	----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a curb of a route.

38	L08 Vehicle	A00 N/A	WT02 Curb J11 Setup	S04 Resident Outside K00 Jeep
----	-------------	---------	------------------------	----------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The term used as "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a jeep, on the "Resident Outside" portion of a "Curb" type delivery.

37	L13 On Route	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
----	--------------	---------	---------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "on route" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) lines the second part of the definition. Another portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The final piece required in this record is the activity detail of "LLV", this allows us to complete the "driving time" definition by putting the carrier in the vehicle. The remaining portions of the record provide more supporting information, residential outside portion of a route.

37	L13 On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
----	--------------	---------	--	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "on route" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines a second part of the definition. Another portion needed is the delivery type, a "Park & Loop delivery type determines that the record does not belong to a curb delivery. The final piece required in this record is the activity detail of "LLV", this allows us to complete the "driving time" definition by putting the carrier in the vehicle. The remaining portions of the record provide more supporting information, residential outside portion of a route.

36	L08 Vehicle	A00 N/A	WT04 Dismount T02 Travel B/t Divr.	S01 Business Inside K00 Jeep
----	-------------	---------	---------------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a dismount delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portions of the record provide more supporting information, the carrier was driving a jeep on the business inside portion of a route.

36	L12 Point of Deliver	A00 N/A	WT05 Central F01 Accountable	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	---------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the residential outside delivery portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

L12	Point of Deliver	A00 N/A	WT05 Central J11 Setup	S04 Resident Outside H13 Central Outside
-----	------------------	---------	---------------------------	---

STS Classification: Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "setup" is the activity of the carrier handing bulk mail pieces. This is the action of the carrier obtaining another armful of mail while standing at a NDCBU "delivery point". He is at the point of delivery getting mail for the next group of residential outside deliveries. The activity detail and resident outside delivery type further supports the NDCBU delivery type.

35	L13 On Route	A00 N/A	WT05 Central T02 Travel B/t Divr.	S04 Resident Outside K01 LLV
----	--------------	---------	--------------------------------------	---------------------------------

STS Classification: Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curbline portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "on route" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. Another portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery (CAT). The final piece required in this record is the activity detail of "LLV", this allows us to complete the "driving time" definition by putting the carrier in the vehicle. The remaining portions of the record provide more supporting information, residential outside portion of a route.

35	L17 Gas Station	A00 N/A	WT02 Curb T00 N/A	S00 N/A H00 N/A
----	-----------------	---------	----------------------	--------------------

STS Classification: Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "Gas Station". The carrier is with the vehicle at a gas station. This action occurs in most cases as the carrier is traveling to the first delivery or returning from the last delivery. The is clearly defined by the STS classification of "Street Support" by "activities such as traveling to and from the route"

34	L13 On Route	A00 N/A	WT04 Dismount T05 Walking	S01 Business Inside K10 Walk Flat
----	--------------	---------	------------------------------	--------------------------------------

STS Classification: Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "walk flat" provide additional supporting information about the conditions the carrier faces.

32	L08 Vehicle	A00 N/A	WT04 Dismount J11 Setup	S02 Business Outside K00 Jeep
----	-------------	---------	----------------------------	----------------------------------

STS Classification: Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a jeep, on the "Business Outside" portion of a "Dismount" type delivery.

32	L12 Point of Deliver	A00 N/A	WT05 Central F02 Parcel	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	----------------------------	--

STS Classification: Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the residential outside delivery portion of a route.

32	L08 Vehicle	A00 N/A	WT03 Park & Loop J09 Loading	S04 Resident Outside K01 LLV
----	-------------	---------	---------------------------------	---------------------------------

STS Classification: Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is loading an LLV at the residential outside portion of an park and loop type route.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
--------------------------	-------------	-----------------	----------------------	---------------------------	----------------------------------

Code Activities	Code Activity Detail
------------------------	-----------------------------

2	L12	Point of Deliver	A00	N/A	WT03 Park & Loop F01 Accountable	S04 Resident Outside H10 Drop to Cust
---	-----	------------------	-----	-----	-------------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a "Park & Loop" type delivery, on the residential outside delivery portion of a route.

32	L14	P B L	A02	Sbj Break	WT01 Foot T00 N/A	S00 N/A H00 N/A
----	-----	-------	-----	-----------	----------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location "P B L" (personal break and lunch). The carrier personal code of "A02" "Sbj Break" is the compensated time the carrier is allowed for break. Due to the nature of the STS category of Street Support a decision was made to include all carrier breaks in this category. The "break" cannot be assigned to any of the other STS categories.

31	L13	On Route	A00	N/A	WT04 Dismount F01 Accountable	S04 Resident Outside K10 Walk Flat
----	-----	----------	-----	-----	----------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is to deliver an accountable. The activity detail of "walk flat" is required to demonstrate that the carrier has not reached the customer. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" helps provide some additional supporting information about delivery.

31	L12	Point of Deliver	A00	N/A	WT04 Dismount J12 Finger @ Deliver	S04 Resident Outside H11 Gang Box
----	-----	------------------	-----	-----	---------------------------------------	--------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Dismount type delivery, to a residential outside delivery point and is placing the mail a gang box type mailbox. Based on the definition this information is supportive in determining the "load time" classification

31	L13	On Route	A00	N/A	WT04 Dismount T03 Trav B/t w/sort	S04 Resident Outside K10 Walk Flat
----	-----	----------	-----	-----	--------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.

30	L13	On Route	A00	N/A	WT04 Dismount T02 Travel B/t Divr.	S04 Resident Outside K11 Walk Obst
----	-----	----------	-----	-----	---------------------------------------	---------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries while fingering or sorting the mail as the activity (Trav B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Obst" (walking obstructed) provides some additional supporting information about the conditions the carrier faces.

30	L12	Point of Deliver	A00	N/A	WT03 Park & Loop J12 Finger @ Deliver	S04 Resident Outside H09 1 Hand Slam
----	-----	------------------	-----	-----	--	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a "Park & Loop" type delivery, to a residential outside delivery point and is placing the mail in a one-hand slam type mailbox. Based on the definition this information is supportive in determining the "load time" classification

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail 30	
L07	Dock	A00	N/A	WT04	Dismount J09 Loading	S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a dismount route.</p>						
29	L08	Vehicle	A00	N/A	WT03 Park & Loop J11 Setup	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is on the "Resident Outside" portion of a "Park & Loop" type delivery.</p>						
29	L08	Vehicle	A00	N/A	WT05 Central T02 Travel B/t Divr.	S00 N/A K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "Vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery (CAT). The remaining portions of the record provide more supporting information, the carrier is in an LLV on the residential outside portion of a route.</p>						
28	L08	Vehicle	A00	N/A	WT03 Park & Loop T02 Travel B/t Divr.	S00 N/A K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "Vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a park and loop delivery type determines that the record does not belong to a curb delivery (CAT). The remaining portions of the record provide more supporting information, the carrier is in an LLV on the residential outside portion of a route.</p>						
28	L08	Vehicle	A00	N/A	WT04 Dismount J09 Loading	S01 Business Inside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was loading an LLV on the business inside portion of dismount route.</p>						
28	L07	Dock	A00	N/A	WT02 Curb J10 Unloading	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on a curb of a residential outside route.</p>						
28	L13	On Route	A00	N/A	WT05 Central T02 Travel B/t Divr.	S01 Business Inside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries as the activity (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.</p>						
28	L13	On Route	A00	N/A	WT02 Curb T02 Travel B/t Divr.	S04 Resident Outside K10 Walk Flat
<p>STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is "On Route". This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the activity of traveling between deliveries (Travel B/t Divr.). The definition is now complete. These last two pieces of information are supportive in determining the STS "CAT" classification, and provide a better definition as the mode of travel.</p>						

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail
27	L08 Vehicle	A00 N/A	WT05 Central T02 Travel B/t Divr.	S01 Business Inside K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provide as "Driving vehicles on all portions of letter routes other than the curblin portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "Vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Divr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery (CAT). The remaining portions of the record provide more supporting information, the carrier is in an LLV on the business inside portion of a route.</p>				
27	L12 Point of Deliver	A00 N/A	WT04 Dismount F01 Accountable	S01 Business Inside H10 Drop to Cust
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a dismount type delivery, on the business inside portion of a route.</p>				
26	L11 Relay Box	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Relay Box". More information is needed to determine the category. The term used as "Del/Coll." (deliver and collect) is defined as consistent with "Preparing bulk mail at the vehicle and at relay boxes" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier on a foot route in a residential outside delivery portion of the route.</p>				
25	L12 Point of Deliver	A00 N/A	WT04 Dismount J12 Finger @ Deliver	S04 Resident Outside K01 LLV
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Dismount type delivery, to a residential outside delivery point from the LLV. Based on the definition this information is supportive in determining the "load time" classification</p>				
25	L08 Vehicle	A00 N/A	WT05 Central J10 Unloading	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the residential outside portion of a central route.</p>				
25	L12 Point of Deliver	A00 N/A	WT05 Central F02 Parcel	S04 Resident Outside H13 Central Outside
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The "load time" choice is further supported by the "Central Outside" activity detail. Many of the NDCBU type deliveries include a parcel locker for delivery of the parcel. This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the residential outside delivery portion of a route.</p>				
24	L13 On Route	A00 N/A	WT01 Foot T02 Travel B/t Divr.	S01 Business Inside K04 Walk Push Cart
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Push Cart" (Walking with a pushcart) provides some additional supporting information about the conditions the carrier faces.</p>				
24	L12 Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H05 Flat Receptacle
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering on a foot route to outside residential delivery points with a flat</p>				

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
		Code Activities		Code Activity Detail
24	L09 Park Point	A00 N/A	WT05 Central J11 Setup	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Resident Outside" portion of a "Central" type delivery.</p>				
23	L08 Vehicle	A00 N/A	WT05 Central J09 Loading	S04 Resident Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was loading an LLV on the residential outside portion of central route.</p>				
23	L08 Vehicle	A00 N/A	WT02 Curb J11 Setup	S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the curb portion of the route..</p>				
23	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J08 Del/Coll.	S02 Business Outside H10 Drop to Cust
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is the activity of the carrier delivering mail. The load time defir is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Park and loop type delivery, on the business outside delivery portion of a route.</p>				
22	L08 Vehicle	A00 N/A	WT04 Dismount J09 Loading	S02 Business Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV, on the business outside portion of a dismount route.</p>				
22	L08 Vehicle	A00 N/A	WT04 Dismount J10 Unloading	S00 N/A K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was loading an LLV on a dismount portion of the route.</p>				
22	L13 On Route	A00 N/A	WT03 Park & Loop T02 Travel B/t Divr.	S03 Resident Inside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Inside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".</p>				

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

22	L08	Vehicle	A00	N/A	WT05 Central J10 Unloading	S00 N/A K01 LLV
----	-----	---------	-----	-----	-------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on the portion of a central route.

22	L12	Point of Deliver	A00	N/A	WT05 Central J08 Del/Coll.	S04 Resident Outside H12 Central Inside
----	-----	------------------	-----	-----	-------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering on a central portion of a route to outside residential delivery points to a central inside type mailbox. Based on the definition this information is supportive in determining the "load time" classification

22	L12	Point of Deliver	A00	N/A	WT03 Park & Loop F02 Parcel	S04 Resident Outside H10 Drop to Cust
----	-----	------------------	-----	-----	--------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Parcel" is the activity of the carrier delivering a parcel. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Park and Loop type delivery, on the residential outside delivery portion of a route.

22	L08	Vehicle	A00	N/A	WT05 Central J11 Setup	S02 Business Outside K01 LLV
----	-----	---------	-----	-----	---------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the central portion of a business outside type route..

21	L08	Vehicle	A00	N/A	WT03 Park & Loop J10 Unloading	S00 N/A K01 LLV
----	-----	---------	-----	-----	-----------------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in an LLV on the portion of a park and loop route.

21	L08	Vehicle	A00	N/A	WT05 Central J08 Del/Coll.	S04 Resident Outside H13 Central Outside
----	-----	---------	-----	-----	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location is "vehicle", on a central type delivery this is not enough information to determine "load time". The activity of "Del/Coll." (Deliver and collect) is consistent with the "load time" definition. This satisfies the definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to outside residential delivery points to a central outside type mailbox. Some NDCBU units are mounted with the side of the box used to load the mail facing the curb. The carrier is able to service the central delivery points from the vehicle. Based on the definition this information is supportive in determining the "load time" classification

21	L09	Park Point	A00	N/A	WT03 Park & Loop J11 Setup	S01 Business Inside K01 LLV
----	-----	------------	-----	-----	-------------------------------	--------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Business Inside" portion of a "Park & Loop" type delivery.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
21	L12	Point of Deliver	A00 N/A	Code Activities WT02 Curb J08 Del/Coll.	Code Activity Detail S04 Resident Outside H01 Illegal Mail Box
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a curbside route delivery, in a residential neighborhood of outside delivery points to a mail box that has been damaged, missing or unusable. Based on the definition this information is supportive in determining the "load time" classification</p>					
21	L13	On Route	A00 N/A	WT01 Foot T02 Travel B/t Divr.	S01 Business Inside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/t Divr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".</p>					
20	L08	Vehicle	A00 N/A	WT04 Dismount J12 Finger @ Deliver	S04 Resident Outside K01 LLV
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Vehicle", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" is the activity of the carrier fingering the mail at the point of delivery. This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is in the LLV delivering to a dismount type delivery, on the residential outside delivery portion of a route.</p>					
20	L11	Relay Box	A00 N/A	WT01 Foot J11 Setup	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Relay Box". More information is needed to determine the category. The term used as "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery" is consistent with "Preparing bulk mail at the vehicle and at relay boxes" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier on a foot route in a residential outside delivery portion of the route.</p>					
20	L13	On Route	A00 N/A	WT03 Park & Loop T05 Walking	S04 Resident Outside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".</p>					
20	L08	Vehicle	A00 N/A	WT03 Park & Loop J11 Setup	S02 Business Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Business Outside" portion of a "Park & Loop" type delivery.</p>					
20	L09	Park Point	A00 N/A	WT03 Park & Loop J11 Setup	S02 Business Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "park point". More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with relocating mail at the vehicle. The remaining portion of the record provides more details in determining the carriers actions. The carrier is at the LLV on the "Business Outside" portion of a "Park & Loop" type delivery.</p>					
20	L13	On Route	A00 N/A	WT03 Park & Loop T03 Trav B/t w/sort	S01 Business Inside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Park & Loop" and the carrier is traveling between deliveries and sorting or fingering the mail (Trav B/t w/sort). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides additional supporting information about the choice of "Route/Access (FAT)".</p>					

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
		Code Activities		Code Activity Detail

19	L12 Point of Deliver	A00 N/A	WT03 Park & Loop J12 Finger @ Deliver	S04 Resident Outside H06 # 1 Box
----	----------------------	---------	--	-------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" is the activity of the carrier fingering the mail at the point of delivery. This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a #1 box on a park and loop type delivery, to the residential outside delivery portion of a route.

19	L07 Dock	A00 N/A	WT03 Park & Loop J09 Loading	S04 Resident Outside K01 LLV
----	----------	---------	---------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Dock". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is loading an LLV at the residential outside portion of a park and loop type route.

19	L13 On Route	A00 N/A	WT04 Dismount T02 Travel Bt Dvr.	S02 Business Outside K09 Walking
----	--------------	---------	-------------------------------------	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Dismount" and the carrier is traveling between deliveries (Travel Bt Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and the activity detail of "Walking" provides additional supporting information about the choice of "Route/Access (FAT)".

19	L12 Point of Deliver	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H10 Drop to Cust
----	----------------------	---------	----------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." is the activity of the carrier delivering mail. The load time definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The remaining information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Foot type route, on the residential outside delivery portion of a route.

19	L13 On Route	A00 N/A	WT05 Central T02 Travel Bt Dvr.	S04 Resident Outside K09 Walking
----	--------------	---------	------------------------------------	-------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Central" and the carrier is traveling between deliveries (Travel Bt Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" and the activity detail of "Walking" provides additional supporting information about the choice of "Route/Access (FAT)".

18	L08 Vehicle	A00 N/A	WT01 Foot T04 Return to Unit	S00 N/A K06 Bus - Public
----	-------------	---------	---------------------------------	-----------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". In this case the vehicle public transportation, a bus. More information is needed to determine the category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is in a bus returning to the unit from a foot route.

1	L08 Vehicle	C05 Other - Specify	WT05 Central D08 Delay - Specify	S00 N/A K01 LLV
---	-------------	---------------------	-------------------------------------	--------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter route: other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "C05 Other - Specify" in the "Personal / Administrative" level and the "D08 Delay - Specify" in the activities level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place. The delivery type central determines that the record does not belong to a curb delivery.

1	L08 Vehicle	C05 Other - Specify	WT03 Park & Loop F04 DelaySpfyDetail	S04 Resident Outside G05 Excess Wrds Carr
---	-------------	---------------------	---	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "Vehicle", this does not provide enough information to determine the STS category. The activity of "DelaySpfyDetail" (Delay Specify Details) does not provide additional information. The "Personal / Administrative" code of "C05 Other - Specify" does not provide additional information. The activity detail of "G04" "Excess Wrds Carr" (Excess words by the carrier) allows us to determine the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a "Park & Loop" type delivery, on the residential outside portion of a route.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail

1	L08 Vehicle	C05 Other - Specify	WT03 Park & Loop T00 N/A	S00 N/A H00 N/A
---	-------------	---------------------	-----------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The "Personal / Administrative" code "C03 Other - Specify" would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place. The remaining portion of the record provides more details in determining the carriers actions. The carrier was on a "Park & Loop" type delivery portion of a route. The STS category of "Street Support" was assigned

1	L12 Point of Deliver	A00 N/A	WT05 Central J12 Finger @ Deliver	S04 Resident Outside H11 Gang Box
---	----------------------	---------	--------------------------------------	--------------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Finger @ Deliver" (Fingering or sorting mail at the delivery point) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a Central type delivery, to a residential outside delivery point and is placing the mail into a gang box type mailbox. Based on the definition this information is supportive to determining the "load time" classification

1	L08 Vehicle	C05 Other - Specify	WT02 Curb T00 N/A	S00 N/A H00 N/A
---	-------------	---------------------	----------------------	--------------------

STS Classification Route/Access (CAT) Using the "CAT" definition of "Vehicle driving time on the curblines portions of routes. Also includes the time spent driving up to curblines stops to load mail into and to collect mail from customer boxes." On these records the carrier is "Vehicle". This alone does not permit us to classify these records. The delivery type is curb, this allows us to refine the classification. The final piece need to apply the "CAT" classification is the "Personal / Administrative" code of "C05 Other - Specify" would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place.

1	L08 Vehicle	C03 Superv. Instruct	WT02 Curb F04 DelaySpfyDetail	S04 Resident Outside H00 N/A
---	-------------	----------------------	----------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The term used as "DelaySpfyDetail" (delay specify detail) is further defined by the "Personal / Administrative" code "C03 Super. Instruct". The carriers' supervisor is out on the route, at the vehicle giving instructions to the carrier. The remaining portion of the record provides more details in determining the carriers actions. The carrier was on a "Curb" type delivery portion of a residential outside group of deliveries. The STS category of "Street Support" was assigned.

1	L12 Point of Deliver	C02 Forms	WT05 Central F01 Accountable	S04 Resident Outside H13 Central Outside
---	----------------------	-----------	---------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "Point of Deliver" and the "Personal / Administrative" code "C02 Forms" describes the carrier at the point of delivery completing a form (notice of accountable delivery). This notice would satisfy the "providing special services" portion of the definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a central outside box of a central type delivery in a residential neighborhood.

1	L09 Park Point	A00 N/A	WT02 Curb J09 Loading	S00 N/A K01 LLV
---	----------------	---------	--------------------------	--------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was at the LLV on a "Curb" type delivery.

1	L13 On Route	A00 N/A	WT01 Foot T04 Return to Unit	S03 Resident Inside K09 Walking
---	--------------	---------	---------------------------------	------------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is "On Route". More information is needed to determine the category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is walking back to the unit from a foot route of residential inside deliveries.

1	L12 Point of Deliver	C02 Forms	WT05 Central T00 N/A	S00 N/A H00 N/A
---	----------------------	-----------	-------------------------	--------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location "Point of Deliver" and the "Personal / Administrative" code "C02 Forms" describes the carrier at the point of delivery completing a form (notice of parcel delivery). This notice would satisfy the "providing special services" portion of the definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a central type delivery.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Delivery Type Status
			Code Activities	Code Activity Detail
1	L08 Vehicle	A00 N/A	WT05 Central D08 Delay - Specify	S03 Resident Inside H00 N/A
<p>STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "D08 Delay - Specify" in the administrative level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what activity was taking place. The delivery type central determines that the record does not belong to a curb delivery.</p>				
1	L13 On Route	A00 N/A	WT01 Foot T01 Travel To 1 Divr	S02 Business Outside K10 Walk Flat
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Divr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was walking on flat ground on the business outside portion of a foot type route.</p>				
1	L13 On Route	A00 N/A	WT01 Foot T02 Travel B/t Divr.	S02 Business Outside K09 Walking
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops; that is, walking up to a residential and/or business delivery points to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". This alone is not sufficient to determine the STS category. The activity of "Travel B/t Divr." (travel between deliveries) and the delivery type being serviced are "Foot" type deliveries. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Outside" and walking provides additional supporting information about the carriers' activities.</p>				
1	L08 Vehicle	A00 N/A	WT05 Central T02 Travel B/t Divr.	S02 Business Outside K00 Jeep
<p>STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curbside portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "Travel B/t Divr." (travel between deliveries) provides a portion of the definition, "driving vehicles on all portions of letter routes". The delivery type central determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The activity detail of "Jeep" and the "Business Outside" delivery status are supportive of the "Driving Time" selection</p>				
1	L13 On Route	A00 N/A	WT01 Foot T04 Return to Unit	S02 Business Outside K09 Walking
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is "On Route". More information is needed to determine the category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is walking back to the unit from a foot route of business outside deliveries.</p>				
1	L08 Vehicle	A00 N/A	WT05 Central J10 Unloading	S02 Business Outside K01 LLV
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a LLV, on the business outside portion of a central of a route.</p>				
1	L13 On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S03 Resident Inside H12 Central Inside
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data point records the carrier location as "On Route", more information is required to classify this record. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to a residential inside delivery point into a central inside type of mailbox. Based on the definition this information is supportive in determining the "load time" classification</p>				
1	L13 On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S02 Business Outside H02 1 Handed Slot
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data point records the carrier location as "On Route", more information is required to classify this record. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to a business outside delivery points into a one-handed slot type of mailbox. Based on the definition this information is supportive in determining the "load time" classification</p>				

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

1	L13	On Route	A00 N/A	WT01 Foot T02 Travel Bt Dvr.	S03 Resident Inside K10 Walk Flat
---	-----	----------	---------	---------------------------------	--------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". This alone is not sufficient to determine the STS category. The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel Bt Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Inside" and "Walk Flat" provides additional supporting information about the carrier's location.

1	L08	Vehicle	A00 N/A	WT05 Central J11 Setup	S03 Resident Inside H12 Central Inside
---	-----	---------	---------	---------------------------	---

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the vehicle. More information is needed to determine the category. The carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". The term used as "Setup" would be defined "as preparing mail in bulk at the vehicle" is consistent with "Preparing mail in bulk at the vehicle". The remaining portion of the record provides more details in determining the carriers actions. The carrier was at a central delivery on a central type route.

1	L08	Vehicle	A00 N/A	WT05 Central T00 N/A	S01 Business Inside K01 LLV
---	-----	---------	---------	-------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "N/A" does not provide any additional information. The delivery type central determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors.

1	L08	Vehicle	A00 N/A	WT05 Central T00 N/A	S01 Business Inside H00 N/A
---	-----	---------	---------	-------------------------	--------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblane portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "N/A" does not provide any additional information. The delivery type central determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors.

1	L13	On Route	A00 N/A	WT01 Foot D08 Delay - Specify	S04 Resident Outside H00 N/A
---	-----	----------	---------	----------------------------------	---------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". This alone is not sufficient to determine the STS category. The delivery type being serviced is "Foot" and the carrier is being delayed. This delay specify could be the carrier waiting to cross a busy street or waiting at a stoplight. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Resident Outside" provides additional supporting information about the carrier's location.

1	L13	On Route	A00 N/A	WT01 Foot D10 Wait 4 Collectn	S04 Resident Outside H00 N/A
---	-----	----------	---------	----------------------------------	---------------------------------

STS Classification Collection Box The STS definition of "Collection Time" is "The time spent walking up to and sweeping Express mail and non-express mail collection boxes. The time spent driving vehicles up to the collection stops is included in driving time,....". The data point records the carrier location as "On Route". The location does not provide enough information to determine the STS category. The activity of "Wait 4 Collectn" (Wait for Collection) is the carrier waiting at the collection box for the collection time. The allows for the STS category of "Collection Time" to be assigned. The information in the remainder of the record further supports the selection. The carrier is on a "foot" type route in a residential outside group of deliveries.

1	L13	On Route	A00 N/A	WT01 Foot F04 DelaySpckyDetail	S04 Resident Outside G04 Excess Wrds Cust
---	-----	----------	---------	-----------------------------------	--

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carrier location as "On route", this does not provide enough information to determine the STS category. The activity of "DelaySpckyDetail" (Delay Specify Details) also does not provide additional information. The activity detail of "G04" "Excess Wrds Cust" (Excess words by the customer) allows us to determine the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a foot type delivery, on the residential outside portion of a route.

1	L08	Vehicle	A00 N/A	WT05 Central T04 Return to Unit	S00 N/A K00 Jeep
---	-----	---------	---------	------------------------------------	---------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Vehicle". More information is needed to determine the STS category. The term used as "Return to Unit" is defined as "traveling to and from the route" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier is in a jeep returning to the unit from a central type delivery.

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail

1	L13	On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S04 Resident Outside H09 1 Hand Slam
---	-----	----------	---------	----------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data point records the carrier location as "On Route", more information is required to classify this record. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a foot route type delivery, to a residential outside delivery into a one-hand slam type of mailbox. Based on the definition this information is supportive in determining the "load time" classification

1	L13	On Route	A00 N/A	WT01 Foot T02 Travel B/T Dvr.	S03 Resident Inside K09 Walking
---	-----	----------	---------	----------------------------------	------------------------------------

STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries (Travel B/T Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Residential Inside" and the activity detail of "Walking" provides additional supporting information about the conditions the carrier faces

1	L08	Vehicle	A00 N/A	WT05 Central F01 Accountable	S04 Resident Outside K01 LLV
---	-----	---------	---------	---------------------------------	---------------------------------

STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter routes other than the curblin portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "Accountable" shows the carrier has an accountable to be delivered. The activity detail is required to determine where the carrier is with the accountable. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors.

1	L09	Park Point	A00 N/A	WT03 Park & Loop J09 Loading	S04 Resident Outside K01 LLV
---	-----	------------	---------	---------------------------------	---------------------------------

STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the park point. More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was at the LLV on the "Resident Outside" portion of a "Park & Loop" type delivery.

1	L12	Point of Deliver	C02 Forms	WT05 Central T00 N/A	S04 Resident Outside H00 N/A
---	-----	------------------	-----------	-------------------------	---------------------------------

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point record the carrier location as "Point of Deliver", this is consistent with the "at residential and business delivery points" portion of the "load time" definition. The activity and activity detail of N/A does not provide any further details. The personal and administrative code "C02" for "Forms" details the carrier is filling out a form at the point of delivery. The use of the "C02" code is consistent with the "incidental time for customer contacts" portion of the "load time" definition. The other supporting information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, outside residential delivery point. Based on the definition this information is supportive in determining the "load time" classification

1	L12	Point of Deliver	C05 Other - Specify	WT05 Central F01 Accountable	S01 Business Inside H12 Central Inside
---	-----	------------------	---------------------	---------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "accountable" is the activity of the carrier delivering an accountable piece of mail. This satisfies the "load time" definition. The "C05" "Other - Specify" in the administrative level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what administrative function was taking place. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering to a central type delivery, on the business inside portion of a route.

1	L12	Point of Deliver	C05 Other - Specify	WT05 Central J08 Del/Coll.	S02 Business Outside H13 Central Outside
---	-----	------------------	---------------------	-------------------------------	---

STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services". The data points records the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The "C05" "Other - Specify" in the administrative level would require a reference to the observer comments log or the USPS form 3999X to determine exactly what administrative function was taking place. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central type delivery, on the business outside delivery portion of a route to a central outside type mailbox. Based on the definition this information is supportive in determining the "load time" classification.

Number of tallies	Code Location	Code Personal	Code Delivery Type	Code Activities	Code Delivery Type Status	Code Activity Detail
1	L13 On Route	A00 N/A	WT01 Foot D08 Delay - Specify	S00 N/A H00 N/A		
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is delayed on route. These portions of the record are consistent with the definition of "FAT". The "Specify" portion of the Activity "Delay - Specify" requires the remaining fields of the record to identify from the observers comment log the specific reason the carrier was delayed.</p>						
1	L08 Vehicle	A00 N/A	WT05 Central J10 Unloading	S04 Resident Outside K00 Jeep		
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Unloading" is defined as "Taking empty trays, tubs, collected mail etc. out of the vehicle typically at the end of the day" and is consistent with "preparing mail in bulk at the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a jeep, on the residential outside portion of a central of a route.</p>						
1	L13 On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S00 N/A K03 Pickup / Van		
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was in a Pickup/Van of another carrier traveling to the first delivery of a foot type route.</p>						
1	L08 Vehicle	A00 N/A	WT05 Central J09 Loading	S04 Resident Outside K00 Jeep		
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the 'slide' and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was at the jeep on the "Resident Outside" portion of a "Central" type delivery.</p>						
1	L13 On Route	A00 N/A	WT01 Foot J08 Del/Coll.	S02 Business Outside H10 Drop to Cust		
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points. Also includes incidental time for customer contacts and providing of special services." The data point records the carriers' location as "On route" this does not provide enough information to classify the record. The activity of "Del/Coll." is the activity of the carrier delivering or collecting mail. The "load time" definition is further supported by the "Drop to Cust" (drop to customer) activity detail. The drop to customer satisfies the second portion of the "load time" definition as to "incidental time for customer contacts". This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is delivering on a foot type route, on the business outside delivery portion of a route.</p>						
1	L13 On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S00 N/A K09 Walking		
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was walking to the first delivery of a foot type route.</p>						
1	L12 Point of Deliver	C02 Forms	WT05 Central J08 Del/Coll.	S02 Business Outside H13 Central Outside		
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Point of Deliver", this is consistent with the "load time" definition. The activity of "Del/Coll." (Deliver and collect) is also consistent with the "load time" definition. This satisfies the definition. The other information included in the record provides more detail to exactly what the work the carrier is performing. He is delivering to a central route type delivery, in a business outside delivery points to an outside central type of mailbox. Based on the definition this information is supportive in determining the "load time" classification</p>						
1	L13 On Route	A00 N/A	WT01 Foot F01 Accountable	S01 Business Inside K10 Walk Flat		
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The activity code of "F01" "Accountable" shows the carrier is delivering an accountable piece of mail. The delivery type of "Foot" is consistent with the "FAT" category. The activity detail is required to determine the location of the carrier. The "K10" "Walk Flat" shows the carrier is walking and has not made contact with the customer. These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" provides additional information about the carriers location.</p>						

Number of tallies	Code	Location	Code Personal	Code Delivery Type	Code Delivery Type Status
				Code Activities	Code Activity Detail
1	L08	Vehicle	A00 N/A	WT05 Central T02 Travel B/t Dvr.	S03 Resident Inside K02 1 or 2 Ton Truck
<p>STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter route other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of traveling between deliveries (Travel B/t Dvr.) defines the second part of the definition. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portion of the record provide more supporting information, the carrier was driving a 1 or 2 ton truck on the residential inside delivery type portion of the route.</p>					
1	L13	On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S01 Business Inside K06 Bus - Public
<p>STS Classification Driving Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was using public transportation to travel to the first delivery of a foot type route.</p>					
1	L13	On Route	A00 N/A	WT01 Foot T01 Travel To 1 Dvr	S01 Business Inside K10 Walk Flat
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is in the "On Route". The carrier activity of "Travel to 1 Dvr" (Travel to first delivery) satisfies the "traveling to and from the route, to the carriers' station" portion of the STS definition. The remaining portion of the record provides more details in determining the carriers actions. The carrier was walking to the first delivery of a business inside foot type route.</p>					
1	L08	Vehicle	A00 N/A	WT05 Central T00 N/A	S03 Resident Inside K01 LLV
<p>STS Classification Driving Time Using the definition for "Driving Time" provided as "Driving vehicles on all portions of letter route other than the curblines portions. Also includes time spent driving to stop locations (deviations). It does not include the time spent by the carrier after stopping the vehicle and leaving it." By the carrier location of "vehicle" we supply part of the definition. The activity of "N/A" does not provide any further information. The activity detail defines the carrier is in a LLV. The final portion needed is the delivery type, a central delivery type determines that the record does not belong to a curb delivery. The record belongs in "Driving time" due to these factors. The remaining portion of the record provide more supporting information the carrier was on the residential inside delivery type portion of the route.</p>					
1	L08	Vehicle	A00 N/A	WT05 Central J12 Finger @ Deliver	S03 Resident Inside K01 LLV
<p>STS Classification Load Time Using the "Load Time" definition of "Delivering and collecting mail pieces at residential and business delivery points." The data points record the carrier location as "Vehicle", does not provide enough information to determine the STS category. The activity of "Finger at Deliver." is also consistent with the "load time" definition as the action of sorting mail at the delivery point. The other information included in the record provides more detail to exactly what the work the carrier is performing. The carrier is in the LLV delivering to a central type delivery, in a residential neighborhood of inside delivery points. Based on the definition this information is supportive in determining the "load time" classification.</p>					
1	L13	On Route	A00 N/A	WT01 Foot T02 Travel B/t Dvr.	S01 Business Inside K13 Service Elevator
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries the activity (Travel B/t Dvr.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Service Elevator" provides some additional supporting information about the conditions the carrier faces.</p>					
1	L13	On Route	A00 N/A	WT01 Foot T03 Trav B/t w/sort	S01 Business Inside K10 Walk Flat
<p>STS Classification Route/Access (FAT) Using the "FAT" definition of "The time spent by carriers walking on the foot and park and loop portions of routes. Also includes the time spent accessing stops: that is, walking up to a residential and/or business delivery point to deliver and collect mail pieces." The records indicate the carrier's location as "On Route". The delivery type being serviced is "Foot" and the carrier is traveling between deliveries while sorting or fingering the mail (Trav B/t w/sort.). These portions of the record are consistent with the definition of "FAT". The remaining delivery type status of "Business Inside" and the activity detail of "Walk Flat" provides some additional supporting information about the conditions the carrier faces.</p>					
1	L08	Vehicle	A00 N/A	WT05 Central J09 Loading	S04 Resident Outside H00 N/A
<p>STS Classification Street Support Time The STS definition of "Street Support Time" is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "vehicle". More information is needed to determine the category. The term used as "Loading" is defined as "putting mail into the vehicle" and is consistent with "loading the vehicle" from the STS definition. The remaining portion of the record provides more details in determining the</p>					

1 CHAIRMAN GLEIMAN: Is there any Additional
2 Designated Written Cross Examination for this witness? Mr.
3 McLaughlin?

4 MR. McLAUGHLIN: Mr. Chairman, we do have some
5 additional designations.

6 CHAIRMAN GLEIMAN: Please proceed.

7 MR. McLAUGHLIN: I was expecting we'd have many,
8 many more, but for the reasons we discussed earlier, there
9 have been very few responses received in the last week.

10 I would like to hand the witness the following
11 interrogatories: Advo/USPS-T-13-51, 101, 103; 105 through
12 109; MPA/USPS-T-13-7 and 56.

13 CROSS EXAMINATION

14 BY MR. McLAUGHLIN:

15 Q Were those prepared by you?

16 A Just a minute, please, while I skim these.

17 [Pause.]

18 Yes, those were either prepared by me or under my
19 supervision.

20 Q And are they true and correct?

21 A Yes.

22 MR. McLAUGHLIN: Mr. Chairman, I move that they be
23 received into evidence and transcribed.

24 CHAIRMAN GLEIMAN: If I could impose upon you to
25 provide two copies to the Reporter, I'll direct that the

1 material be received into evidence and transcribed into the
2 record.

3 [Additional Designated Written
4 Cross Examination of Lloyd Raymond,
5 Advo/USPS-T-13-51, 101, 103; 105
6 through 109; and MPA/USPS-T-13-7
7 and 56, was received into evidence
8 and transcribed into the record.]

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

ADVO/USPS-T13-51. Please refer to your response to MPA/USPS-T13-51 concerning a definition of the term "outlier."

- (a) Provide any decision rules you had concerning the identification of outliers.**
- (b) Identify all examples of outliers of which you are aware.**
- (c) You state that a lunch break scan at the end of the day would be considered an outlier. What were the standard times for lunch breaks? For example, if there is no break in the middle of the day, would that be considered an outlier? Please explain.**
- (d) You state that six vehicle inspection scans in a row would be an outlier. Please provide some examples of observations which indicate a vehicle inspection is occurring.**
- (e) Is vehicle inspection considered to be an "out-of-office" activity? Please explain.**

RESPONSE:

- (a) There were no formal decision rules concerning the identification of outliers. The data coordinators used their judgement and the field generated-marked-up sets to make corrections to the database. They would then run reports and scan for values that appeared to them as a point to be discussed with the data collectors. Outliers were not purged from the database; they were modified to an agreed-on change based on discussions between the data coordinators and data collectors.**
- (b) Please see response to ADVO/USPS-T13-39.**
- (c) Please see response to ADVO/USPS-T13-67.**
- (d-e) Vehicle inspection was an "in-office" activity and was therefore not part of the LR-I-163. The following sheets contain examples of sets of Vehicle Inspection scans, identified by Location "Vehicle."**

Data Collected - Work Sampling

04/26/2000 8:17:13 PM

5/12/199 OB537 XXXXXXXXXX CY48 XXXXXXXXXX Route: 0148

Job Class	Location		Personal		Delivery Type and Status			Activities		
Regular Carrier	N/A		N/A		N/A	N/A		N/A	N/A	
Regular Carrier	N/A		N/A		N/A	N/A		N/A	N/A	
Regular Carrier	Vehicle	8:01 AM	Vehicle Inspect	8:02 AM	Inside Work	N/A	8:02 AM	N/A	N/A	8:02 AM
Regular Carrier	Work Station	8:06 AM	N/A	8:06 AM	Inside Work	N/A	8:06 AM	Letters	Ltr Srt Empty	8:06 AM
Regular Carrier	Work Station	8:12 AM	N/A	8:12 AM	Inside Work	N/A	8:12 AM	Letters	Ltr Srt Empty	8:12 AM
Regular Carrier	Work Station	8:18 AM	N/A	8:18 AM	Inside Work	N/A	8:18 AM	Letters	Ltr Srt Empty	8:18 AM
Regular Carrier	Work Station	8:24 AM	N/A	8:24 AM	Inside Work	N/A	8:24 AM	Letters	Ltr Srt Partial	8:24 AM
Regular Carrier	Work Station	8:30 AM	N/A	8:30 AM	Inside Work	N/A	8:30 AM	Letters	Ltr Srt Partial	8:30 AM
Regular Carrier	Work Station	8:36 AM	N/A	8:36 AM	Inside Work	N/A	8:36 AM	Flats	Flt Srt Vert Em	8:36 AM
Regular Carrier	Work Station	8:42 AM	N/A	8:42 AM	Inside Work	N/A	8:42 AM	Flats	Flt Srt Vert Em	8:42 AM
Regular Carrier	Work Station	8:48 AM	N/A	8:48 AM	Inside Work	N/A	8:48 AM	Flats	Flt Srt Vert Em	8:48 AM
Regular Carrier	N/A	8:48 AM	N/A	8:48 AM	N/A	N/A	8:48 AM	N/A	N/A	8:48 AM
Regular Carrier	Work Station	8:54 AM	N/A	8:54 AM	Inside Work	N/A	8:54 AM	Flats	Flt Srt Vert Par	8:54 AM
Regular Carrier	Work Station	9:00 AM	N/A	9:00 AM	Inside Work	N/A	9:00 AM	Flats	Flt Srt Vert Par	9:00 AM
Regular Carrier	Work Station	9:06 AM	N/A	9:06 AM	Inside Work	N/A	9:06 AM	Flats	Flt Srt Vert Me	9:06 AM

Data Collected - Work Sampling

04/26/2000 6:15:51 PM

9/10/199 OB539 XXXXXXXXXX CY47 XXXXXXXXXX Route: 1507

Job Class	Location		Personal		Delivery Type and Status			Activities		
Regular Carrier	N/A		N/A		N/A	N/A	N/A	N/A		
Regular Carrier	Vehicle	7:06 AM	Vehicle Inspect	7:07 AM	Inside Work	N/A	7:07 AM	N/A	N/A	7:07 AM
Regular Carrier	Work Station	7:12 AM	N/A	7:13 AM	Inside Work	N/A	7:13 AM	Letters	Mat'l Handling	7:13 AM
Regular Carrier	Work Station	7:19 AM	Superv. Instruct	7:19 AM	Inside Work	N/A	7:19 AM	N/A	N/A	7:19 AM
Regular Carrier	Work Station	7:25 AM	N/A	7:25 AM	Inside Work	N/A	7:25 AM	Letters	Ltr Srt Empty	7:25 AM
Regular Carrier	Work Station	7:31 AM	N/A	7:31 AM	Inside Work	N/A	7:31 AM	Letters	Ltr Srt Partial	7:31 AM
Regular Carrier	Work Station	7:37 AM	N/A	7:37 AM	Inside Work	N/A	7:37 AM	Letters	Ltr Srt Partial	7:38 AM
Regular Carrier	N/A	7:43 AM	N/A	7:43 AM	N/A	N/A	7:43 AM	N/A	N/A	7:43 AM
Regular Carrier	Work Station	7:43 AM	N/A	7:43 AM	Inside Work	N/A	7:43 AM	Letters	Ltr Srt Medium	7:43 AM
Regular Carrier	Work Station	7:49 AM	N/A	7:49 AM	Inside Work	N/A	7:49 AM	Letters	Ltr Srt Partial	7:49 AM
Regular Carrier	Work Station	7:55 AM	N/A	7:55 AM	Inside Work	N/A	7:55 AM	Letters	Ltr Srt Partial	7:55 AM
Regular Carrier	Work Station	8:01 AM	N/A	8:01 AM	Inside Work	N/A	8:01 AM	Letters	Ltr Srt Partial	8:01 AM
Regular Carrier	Work Station	8:07 AM	N/A	8:07 AM	Inside Work	N/A	8:07 AM	Flats	Flt Srt Vert Em	8:07 AM
Regular Carrier	Work Station	8:13 AM	N/A	8:13 AM	Inside Work	N/A	8:13 AM	Folded Flats	Flt Srt Vert Fu	8:13 AM
Regular Carrier	Work Station	8:19 AM	N/A	8:19 AM	Inside Work	N/A	8:19 AM	Flats	Flt Srt Vert Me	8:19 AM

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

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

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

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

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			
	Counts for Mail Type	Scan the item(s) that were counted during the task timing	
	Counts for Delivery Type	Scan each item as needed for quantity input	PCxx
	Counts for Transportation Type	Scan each item as needed for quantity input	DCxx
9.1	Quantity	Scan each item as needed for quantity input	TCxx
		Input quantity that applies to the item scanned in level 9	####

10 Work Sampling Location			
10	Location - Inside Location - Outside	Scan inside location where subject is when 6 min. timer sounds Scan outside location where subject is when 6 min. timer sounds	Lxx
11 Work Sampling			
11.1	Personal Non-Job Admin Job Admin	Scan specific subject personal or administrative activity if required when alarm sounds	Axx Bxx 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
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		
		CY02		
		CY03		
		CY04		
4	Route Number	Entry		Keyed entry of 4 digits
4	Subject Job Classification	JC01	Regular Carrier	
		JC02	Utility Carrier	
		JC03	PTE, 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 Time Study			
8.1	Event Number	0000 0001	Not Applicable Events Events 0001 to 9999
8.2	Event Status	STT FIN INT RES NAA	Start Finish Interrupted Resumed Not Applicable Starts task timing function Finish task timing Interrupted task timing Resume task timing
8.3	Task Type	TT00	N/A Not Applicable
	Mail Type	PT01 PT02 PT03 PT04 PT05 PT06 PT07 PT08 PT09 PT10 PT11	AM Letters AM Flats AM Accountable AM Parcels AM Mix AM Admin PM Letters PM Flats PM Accountable PM Mix PM Admin Inside letters handled in the AM Inside flat mail handled in the AM Inside accountables handled in the AM Inside parcels handled in the AM Inside Mixed Mail handled in the AM AM Administrative functions and Inside and Outside Clock Inside letters handled in the PM Inside flat mail handled in the PM Inside accountables handled in the PM Inside Mixed Mail handled in the PM PM Administrative functions and Inside Clock at end of day
	Delivery Type		
	Reference counts to Business and Residential Deliveries	DT12 DT13 DT14 DT15 DT16 DT17 DT18	Curb Foot/Walking Dismount Central / Inside Park and Loop Central / Outside VIM Room Curbside delivery Walking route delivery Dismount delivery Apartment type delivery inside Park and Loop delivery Condominium delivery outside Vertical Improved Mail delivery
	Transportation Type	TT19 TT20 TT21 TT22 TT23 TT24 TT25 TT26 TT27 TT28 TT29	Jeep LLV 1 or 2 Ton Truck Pickup Truck Walking - Push Cart Bike Bus - Public Automobile Elevator - Passenger Walking Train - Public

Tasks	Y00	Not Applicable	
Inside Tasks Yxx	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
			Pull down letter or flat case, band and load, setup relay
	Y07	Pull Down	
	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
			Delivery of accountable on curb / dismount route
	P03	Dismount Accountable	
	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

Event Quantities			
Counts for Mail Type		PC00	Not Applicable
		PC01	Accountables
		PC02	Parcels
		PC03	Letters
		PC04	Flats
		PC05	Withdrawals
		PC06	Forms
		PC07	Folded Flats
		PC08	Delivery Points
		PC09	COA's
		PC10	Bends at Case
		PC11	Feet of mail
		PC12	DPS
		PC13	UBBM Quantity
		PC14	Pulldown Bundles
		PC15	Paces Vehicle Inspection
		PC16	Missorts/CMUs
		PC17	Sequenced Flats
Counts for Delivery Type			
		DC01	Paces Inside
		DC02	Paces Outside
		DC03	Paces Outside Obstructed
		DC04	Bends - Weighted
		DC05	Bends - Unweighted
		DC06	Doors / Gates
		DC07	Forms
		DC08	Residential delivery points
		DC09	Bundles
		DC10	Customer Interaction
		DC11	Pickups
		DC12	Dismounts
		DC13	Illegal Boxes
		DC14	Business delivery points
		DC15	Missed delivery points
		DC16	Screen / Storm Doors
		DC17	Trays/Tubs unloaded
Counts for Transportation Type			
		TC01	Miles
		TC02	Park Points
2.1	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 Vm Room
11.3 Delivery Type Status	S00 Not Applicable S01 Business Inside S02 Business Outside S03 Residential Inside S04 Residential Outside

FEA	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
		J09 Loading
		J10 Unloading
		J11 Setup
		D01 No Access to Box
		D02 Vehicle Breakdown
		D03 Mail Processing
		D04 Weather
		D05 Traffic/Detour
		D06 No Work
		D07 Other

Provide details for Box type next level 11.4.1
Vehicle or Satchel in the AM
Vehicle at the end of the day
Rearranging vehicle or satchel during the day

H 41 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 Pager Occurrences	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 snow at 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	
	Carrier forward reach in inches	
R21		
R23	Distance to clock	Paces to clock from carrier case
	Distance to Accountable	
R24	Cage	Paces to Accountable cage from case
R25	Distance to hotcase	Paces to hotcase from carriers case
R26	Distance to Parcel hamper	
	Distance to Throwback case	
R27		
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	
	Distance to Supervisors	
R38	Desk	
	Distance to 1st swinging exit door	
R39		
13	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

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

and each piece of data has its 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.

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

(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.

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

(b) No, we did not attempt to relate the specific work sampling data contained in LR-1-163 to the time standards. This comparative analysis was not requested by the Postal Service.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/27**

MPA/USPS-T13-7. Please provide a copy of the methods analysis and time values for standards developed during the study described in your testimony at page 5, lines 3-5, and indicate which method(s) was/were used to determine them.

RESPONSE:

Presiding Officer's Ruling NO. R2000-1/27 requires the Postal Service to indicate which method(s) was/were used to determine the final (or most recent) time standards and engineered methods that were developed from the ES project.

This information has already been provided in the responses to interrogatories

NAA/USPS-T13-3, 4.

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND
TO MPA INTERROGATORIES
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/27**

MPA/USPS-T13-56. As to each route/day, please provide the total time and total tallies collected.

RESPONSE:

The following attachment provides the total time recorded which may or may not match the carrier's compensated work hours. The total tallies include both inside/office and outside/street tallies.

Attachment to in Response to MPA/USPS-T13-56

Date	City	Pop. (1990)	Pop. (2000)	Start Time	End Time	End Time
10/15/96	CY07	8035	122	7:12:55	17:47:11	10:34:16
10/15/96	CY08	1638	90	7:36:58	16:29:40	8:52:42
10/15/96	CY11	4712	108	11:03:05	21:05:11	10:02:06
10/16/96	CY02	1595	119	6:32:09	16:53:43	10:21:34
10/16/96	CY07	8045	84	8:05:34	15:50:01	7:44:27
10/16/96	CY08	1632	83	7:17:55	15:18:37	8:00:42
10/16/96	CY11	4811	102	7:35:53	17:15:59	9:40:06
10/17/96	CY02	1569	92	7:05:36	15:44:58	8:39:22
10/17/96	CY07	8028	110	7:32:19	18:20:39	10:48:20
10/17/96	CY08	1620	80	7:32:52	15:57:04	8:24:12
10/17/96	CY11	4732	84	8:02:16	16:10:54	8:08:38
10/21/96	CY03	4126	103	7:36:57	17:11:08	9:34:11
10/21/96	CY05	2835	86	6:31:41	15:21:02	8:49:21
10/22/96	CY03	4114	92	7:01:47	15:28:33	8:26:46
10/22/96	CY05	2822	81	7:36:28	15:19:37	7:43:09
10/22/96	CY10	2160	103	7:31:01	17:46:06	10:15:05
10/22/96	CY11	4731	84	8:07:54	16:10:37	8:02:43
10/23/96	CY03	4106	108	7:34:02	17:31:37	9:57:35
10/23/96	CY05	2806	92	7:08:15	15:53:16	8:45:01
10/23/96	CY10	2167	85	7:37:11	16:14:23	8:37:12
10/23/96	CY11	4910	89	8:04:31	16:31:59	8:27:28
10/24/96	CY03	4104	94	7:39:21	16:12:27	8:33:06
10/24/96	CY05	2814	91	7:10:16	15:37:11	8:26:55
10/24/96	CY10	2169	79	7:01:08	15:12:47	8:11:39
10/24/96	CY11	4725	92	8:01:39	16:30:54	8:29:15
10/25/96	CY10	2155	88	7:29:12	17:16:31	9:47:19
10/25/96	CY11	4708	89	8:04:38	16:25:48	8:21:10
10/26/96	CY11	4817	90	8:02:49	16:29:58	8:27:09
10/28/96	CY06	9302	84	7:30:35	15:17:50	7:47:15
10/28/96	CY09	2469	93	7:29:58	16:47:28	9:17:30
10/28/96	CY11	4921	86	9:05:42	17:39:15	8:33:33
10/29/96	CY09	2451	107	7:09:10	17:36:15	10:27:05
10/29/96	CY11	4814	100	8:08:31	17:24:00	9:15:29
10/30/96	CY09	2465	94	7:07:24	16:24:11	9:16:47
10/30/96	CY11	4719	93	8:05:24	17:14:30	9:09:06
11/01/96	CY11	4726	93	8:04:09	17:13:20	9:09:11
11/05/96	CY17	1928	90	7:36:22	16:20:35	8:44:13
11/06/96	CY14	3703	73	7:11:42	14:38:08	7:26:26
11/06/96	CY17	1908	88	7:33:50	15:28:04	7:54:14
11/07/96	CY17	1926	77	7:33:48	14:56:34	7:22:46
11/08/96	CY02	1558	114	7:30:50	17:34:19	10:03:29
11/09/96	CY02	1560	66	7:05:29	12:43:56	5:38:27
11/12/96	CY14	3705	96	6:00:14	15:21:46	9:21:32
11/13/96	CY16	1233	84	7:03:30	15:26:47	8:23:17
11/14/96	CY16	1237	83	6:54:08	14:51:22	7:57:14
11/14/96	CY18	2934	91	7:02:34	15:29:25	8:26:51
11/15/96	CY03	4111	94	7:52:23	16:37:06	8:44:43
11/18/96	CY16	1252	83	7:11:13	15:14:13	8:03:00
11/18/96	CY19	4846	95	7:32:29	16:20:59	8:48:30
11/19/96	CY15	1061	90	6:53:23	15:57:11	9:03:48
11/19/96	CY19	4880	89	7:05:18	15:31:46	8:26:28
11/20/96	CY15	1024	104	6:43:01	16:34:26	9:51:25
12/03/96	CY34	3125	94	7:28:32	16:13:02	8:44:30
12/04/96	CY34	3104	84	7:59:20	16:20:21	8:21:01
12/04/96	CY36	0326	87	7:05:18	15:20:20	8:15:21

Attachment to in Response to MPA/USPS-T13-56

12/05/96	CY34	3141	104	7:29:29	17:26:54	9:57:25
12/05/96	CY36	0480	88	7:03:06	16:18:08	9:15:02
12/06/96	CY36	0310	84	7:02:11	15:42:09	8:39:58
12/09/96	CY33	1842	107	7:05:59	16:57:01	9:51:02
12/09/96	CY35	6742	104	7:18:27	17:52:27	10:34:00
12/09/96	CY37	0211	103	6:34:10	16:06:35	9:32:25
12/10/96	CY33	1612	100	6:59:02	16:06:51	9:07:49
12/10/96	CY35	6703	94	7:18:05	16:33:28	9:15:23
12/10/96	CY37	0321	79	6:32:04	14:30:52	7:58:48
12/11/96	CY33	1618	90	8:02:35	16:43:15	8:40:40
12/11/96	CY35	6739	86	7:09:00	15:36:00	8:27:00
12/11/96	CY37	0134	88	6:34:18	14:24:55	7:50:37
12/13/96	CY38	8008	103	7:02:10	17:25:59	10:23:49
12/13/96	CY40	8404	90	8:03:00	17:29:50	9:26:50
12/14/96	CY39	0908	78	7:02:36	14:39:51	7:37:15
12/14/96	CY40	8405	80	8:07:13	16:58:44	8:51:31
12/16/96	CY38	8229	93	7:34:19	17:20:03	9:45:44
12/16/96	CY39	1205	97	6:45:42	16:31:03	9:45:21
12/16/96	CY40	8408	87	7:40:17	16:13:23	8:33:06
12/17/96	CY38	8044	73	7:29:09	14:53:57	7:24:48
12/17/96	CY39	1206	93	7:07:02	16:16:28	9:09:26
01/06/97	CY26	0818	95	7:10:37	16:25:30	9:14:53
01/06/97	CY29	3549	95	8:18:52	17:40:57	9:22:05
01/07/97	CY26	0828	99	7:04:09	16:54:33	9:50:24
01/07/97	CY29	4506	86	7:35:17	16:25:36	8:50:19
01/08/97	CY26	0849	85	7:08:51	15:41:41	8:32:50
01/08/97	CY29	3656	85	8:01:56	16:26:29	8:24:33
01/09/97	CY27	1428	95	7:03:14	16:18:18	9:15:04
01/09/97	CY29	3618	89	6:56:34	15:27:28	8:30:54
01/10/97	CY27	1430	83	7:06:31	15:09:23	8:02:52
01/10/97	CY30	3655	79	8:19:14	16:05:40	7:46:26
01/11/97	CY27	1435	90	7:06:13	15:45:03	8:38:50
01/11/97	CY29	4310	96	7:35:31	16:42:52	9:07:21
01/13/97	CY23	0603	77	7:28:32	15:54:46	8:26:14
01/13/97	CY28	2374	90	6:51:33	15:54:19	9:02:46
01/13/97	CY29	4515	98	7:38:54	17:46:36	10:07:42
01/14/97	CY23	0623	91	7:31:35	15:51:38	8:20:03
01/14/97	CY28	2385	96	6:32:30	15:59:44	9:27:14
01/15/97	CY23	0607	75	7:44:15	15:40:17	7:56:02
01/15/97	CY28	2375	66	6:08:58	13:23:27	7:14:29
01/15/97	CY30	4442	68	7:35:08	14:18:48	6:43:40
02/04/97	CY18	2947	87	7:31:24	15:58:22	8:26:58
02/05/97	CY14	3707	72	7:04:56	15:26:00	8:21:04
02/05/97	CY18	2912	87	7:33:04	16:00:06	8:27:02
02/05/97	CY20	5546	81	7:04:33	14:35:23	7:30:50
02/06/97	CY14	3706	72	7:02:23	14:18:39	7:16:16
02/06/97	CY20	5566	92	7:07:16	16:03:39	8:56:23
02/11/97	CY41	0610	88	6:16:48	14:31:43	8:14:55
02/12/97	CY41	0628	87	6:04:27	14:37:01	8:32:34
02/13/97	CY41	0626	94	6:07:59	15:35:38	9:27:39
02/13/97	CY42	1946	80	7:18:44	15:09:33	7:50:49
05/05/97	CY02	1579	99	7:10:57	15:24:56	8:13:59
05/05/97	CY48	0164	113	7:49:40	18:05:17	10:15:37
05/05/97	CY49	0101	94	7:05:08	18:25:24	11:20:16
05/06/97	CY02	1579	96	7:24:49	15:51:07	8:26:18
05/06/97	CY46	1133	92	7:06:09	17:25:19	10:10:04

Attachment to in Response to MPA/USPS-T13-56

05/06/97	CY47	1411	104	7:33:17	17:29:43	9:56:26
05/06/97	CY48	0164	87	8:28:55	16:42:54	8:13:59
05/06/97	CY49	0101	94	7:09:52	16:47:20	9:37:28
05/07/97	CY02	1579	113	7:33:29	16:22:06	8:48:37
05/07/97	CY46	1133	82	7:01:28	15:58:46	8:57:18
05/07/97	CY47	1411	97	7:17:57	16:57:29	9:39:32
05/07/97	CY48	0164	83	7:55:13	15:33:34	7:38:21
05/08/97	CY46	1133	101	7:06:54	16:34:40	9:27:46
05/08/97	CY47	1411	85	7:15:19	14:55:41	7:40:22
05/08/97	CY48	0105	71	7:20:39	15:11:05	7:50:26
05/08/97	CY49	0711	92	7:06:42	17:20:32	10:13:50
05/08/97	CY50	8717	98	6:55:12	16:05:28	9:10:16
05/09/97	CY02	1579	88	7:35:17	15:24:06	7:48:49
05/09/97	CY46	1133	88	7:11:21	16:32:58	9:21:37
05/09/97	CY47	1411	96	7:16:23	16:57:07	9:40:44
05/09/97	CY48	0105	87	7:32:54	16:18:49	8:45:55
05/09/97	CY49	0711	86	7:05:12	16:06:52	9:01:40
05/09/97	CY50	8717	99	7:05:51	16:28:25	9:22:34
05/10/97	CY02	1579	114	6:35:18	16:44:38	10:09:20
05/10/97	CY47	1411	93	7:27:39	17:47:35	10:19:56
05/10/97	CY48	0105	65	7:33:19	14:58:54	7:25:35
05/10/97	CY49	0711	106	7:14:17	17:42:18	10:28:01
05/10/97	CY50	8717	95	7:03:56	16:18:54	9:14:58
05/12/97	CY02	1579	113	6:36:32	17:35:33	10:59:01
05/12/97	CY48	0146	78	8:01:57	15:20:54	7:18:57
05/12/97	CY49	0716	103	7:03:47	17:20:17	10:16:30
05/12/97	CY50	8717	101	7:02:42	16:41:32	9:38:50
05/13/97	CY02	1579	109	7:06:22	17:07:23	10:01:01
05/13/97	CY46	1133	80	7:08:15	16:23:44	9:15:29
05/13/97	CY48	0146	83	8:00:24	15:09:02	7:08:38
05/13/97	CY49	0716	93	7:09:26	15:55:00	8:45:34
05/13/97	CY50	8717	103	6:44:06	16:48:03	10:03:57
05/14/97	CY02	1579	91	7:32:07	15:46:29	8:14:22
05/14/97	CY46	1133	89	7:01:50	15:12:54	8:11:04
05/14/97	CY48	0146	78	8:02:11	14:59:11	6:57:00
05/14/97	CY49	0716	95	7:02:19	15:57:01	8:54:42
05/14/97	CY50	8717	103	7:05:04	16:41:57	9:36:53
05/15/97	CY02	1579	107	7:25:47	16:32:47	9:07:00
05/15/97	CY48	0337	75	7:35:25	15:49:54	8:14:29
05/15/97	CY49	0102	92	7:04:32	16:29:04	9:24:32
05/15/97	CY50	8717	104	7:04:23	17:25:17	10:20:54
05/16/97	CY02	1579	96	7:32:24	16:06:56	8:34:32
05/16/97	CY46	1133	78	7:02:02	16:01:56	8:59:54
05/16/97	CY47	1411	91	7:18:07	16:24:50	9:06:43
05/16/97	CY48	0337	81	7:34:32	15:07:27	7:32:55
05/16/97	CY49	0102	93	7:08:06	15:30:19	8:22:13
05/16/97	CY50	8717	99	7:04:27	16:12:00	9:07:33
05/17/97	CY02	1579	87	7:33:15	15:08:18	7:35:03
05/17/97	CY47	1411	108	6:48:38	17:38:39	10:50:01
05/17/97	CY49	0102	61	6:51:51	14:37:14	7:45:23
05/17/97	CY50	8717	90	7:06:48	15:29:59	8:23:11
05/19/97	CY02	1579	100	7:07:07	16:08:05	9:00:58
05/19/97	CY46	1133	102	6:21:33	16:53:50	10:32:17
05/19/97	CY47	1411	106	7:16:02	17:22:05	10:06:03
05/19/97	CY51	6156	93	8:42:38	17:33:41	8:51:03
05/19/97	CY54	0411	93	7:06:51	17:09:10	10:02:19

Attachment to in Response to MPA/USPS-T13-56

05/20/97	CY02	1579	105	6:35:16	16:30:47	9:55:31
05/20/97	CY46	1133	91	7:03:11	16:30:54	9:27:43
05/20/97	CY51	6156	53	7:54:15	13:11:22	5:17:07
05/20/97	CY54	0411	93	7:04:27	15:57:19	8:52:52
05/21/97	CY02	1579	103	6:38:00	15:48:32	9:10:32
05/21/97	CY46	1133	89	7:04:19	16:40:55	9:36:36
05/21/97	CY51	6156	103	7:44:58	17:30:21	9:45:23
05/21/97	CY54	0411	97	7:03:00	16:37:21	9:34:21
05/22/97	CY46	1133	77	7:05:34	15:19:42	8:14:08
05/22/97	CY47	1411	86	7:23:45	15:44:08	8:20:23
05/22/97	CY50	8717	96	6:52:33	15:54:10	9:01:37
05/22/97	CY51	6157	60	7:12:22	12:44:15	5:31:53
05/22/97	CY54	0424	77	6:44:29	15:36:27	8:51:58
05/23/97	CY02	1579	72	6:33:17	12:47:12	6:13:55
05/23/97	CY46	1133	71	7:06:50	15:23:01	8:16:11
05/23/97	CY50	8717	95	6:54:25	16:24:30	9:30:05
05/23/97	CY51	6157	81	7:25:06	15:15:47	7:50:41
05/23/97	CY54	0424	78	6:25:44	16:08:21	9:42:37
05/24/97	CY02	1579	99	7:06:38	15:35:12	8:28:34
05/24/97	CY46	1133	81	7:03:50	15:57:06	8:53:16
05/24/97	CY50	8717	93	6:47:43	15:02:10	8:14:27
05/24/97	CY54	0424	61	6:19:57	14:06:08	7:46:11
05/27/97	CY02	1579	109	6:35:56	16:15:07	9:39:11
05/27/97	CY46	1133	109	6:12:45	17:01:00	10:48:15
05/27/97	CY51	6410	94	7:05:36	15:56:37	8:51:01
05/27/97	CY54	0432	107	7:35:14	17:59:32	10:24:18
05/28/97	CY46	1133	89	7:04:14	16:28:39	9:24:25
05/28/97	CY51	6410	86	7:32:45	15:29:31	7:56:46
05/28/97	CY54	0432	100	7:14:35	16:03:14	8:48:39
05/29/97	CY46	1133	83	7:05:09	15:52:00	8:46:51
05/29/97	CY50	8717	87	7:10:31	15:02:46	7:52:15
05/29/97	CY51	6419	106	8:06:11	18:07:28	10:01:17
05/29/97	CY54	0474	97	7:09:58	16:32:01	9:22:03
05/30/97	CY46	1133	80	7:04:42	16:17:15	9:12:33
05/30/97	CY47	1411	106	7:17:26	18:48:14	11:30:48
05/30/97	CY50	8717	99	7:03:14	15:48:44	8:45:30
05/30/97	CY54	0474	104	6:39:44	15:18:10	8:38:26
05/31/97	CY02	1579	100	7:05:42	16:09:09	9:03:27
05/31/97	CY46	1133	77	7:06:18	15:39:46	8:33:28
05/31/97	CY47	1411	107	7:26:06	17:11:38	9:45:32
05/31/97	CY50	8717	50	7:08:35	15:29:22	8:20:47
05/31/97	CY54	0474	87	6:54:12	15:19:58	8:25:46
06/02/97	CY46	1148	78	7:08:23	16:19:41	9:11:18
06/02/97	CY52	1101	98	7:48:36	17:01:18	9:12:42
06/02/97	CY55	0621	108	7:38:13	19:13:24	11:35:11
06/03/97	CY52	1101	93	6:46:50	15:13:47	8:26:57
06/03/97	CY55	0621	88	7:16:24	15:58:54	8:42:30
06/04/97	CY02	1581	97	6:56:45	16:44:35	9:47:50
06/04/97	CY47	1508	92	7:16:25	16:37:04	9:20:39
06/04/97	CY50	8701	111	7:06:38	17:09:19	10:02:41
06/04/97	CY52	1101	87	6:31:40	14:58:33	8:26:53
06/04/97	CY55	0621	97	7:03:57	16:48:20	9:44:23
06/05/97	CY02	1581	111	6:54:49	17:03:24	10:08:35
06/05/97	CY46	1148	82	7:06:42	16:56:09	9:49:27
06/05/97	CY50	8701	87	7:46:53	16:06:45	8:19:52
06/05/97	CY52	1111	89	6:39:35	15:54:31	9:14:56

Attachment to in Response to MPA/USPS-T13-56

06/05/97	CY55	0611	103	8:04:23	18:27:20	10:22:57
06/06/97	CY02	1581	98	6:35:58	15:32:37	8:56:39
06/06/97	CY46	1148	81	7:06:27	14:51:05	7:44:38
06/06/97	CY50	8701	94	7:24:03	15:42:51	8:18:48
06/06/97	CY55	0611	94	6:56:51	15:59:06	9:02:15
06/07/97	CY02	1581	97	6:35:33	15:02:22	8:26:49
06/07/97	CY46	1148	47	7:08:46	11:28:32	4:19:46
06/07/97	CY50	8701	93	7:08:12	15:44:26	8:36:14
06/07/97	CY55	0611	97	7:55:26	16:48:26	8:53:00
06/09/97	CY02	1581	95	7:34:52	16:03:23	8:28:31
06/09/97	CY46	1148	85	7:07:27	15:37:37	8:30:10
06/09/97	CY50	8701	120	6:41:25	17:53:34	11:12:09
06/09/97	CY52	1131	92	6:35:01	14:58:59	8:23:58
06/09/97	CY55	1605	85	6:19:07	15:14:08	8:55:01
06/10/97	CY02	1581	98	7:07:30	15:58:28	8:50:58
06/10/97	CY46	1148	84	7:08:21	15:43:55	8:35:34
06/10/97	CY47	1508	101	7:21:04	16:43:00	9:21:56
06/10/97	CY50	8701	107	7:14:50	17:46:40	10:31:50
06/10/97	CY52	1131	89	6:37:43	14:58:04	8:20:21
06/10/97	CY55	1605	71	6:06:32	12:20:55	6:14:23
06/11/97	CY02	1581	92	7:00:15	16:03:44	9:03:29
06/11/97	CY50	8701	99	7:09:43	15:57:37	8:47:54
06/11/97	CY55	1605	89	6:33:49	15:15:24	8:41:35
06/12/97	CY02	1581	104	7:34:06	17:07:51	9:33:45
06/12/97	CY46	1148	89	7:14:59	17:26:45	10:11:46
06/12/97	CY50	8701	97	7:05:49	16:06:26	9:00:37
06/12/97	CY52	1121	70	6:34:20	13:29:18	6:54:58
06/12/97	CY55	1606	84	6:33:37	14:23:39	7:50:02
06/13/97	CY02	1581	114	6:56:22	17:34:31	10:38:09
06/13/97	CY47	1508	92	7:18:39	15:54:25	8:35:46
06/13/97	CY50	8701	96	7:45:58	16:07:39	8:21:41
06/13/97	CY52	1121	77	6:37:41	13:43:13	7:05:32
06/13/97	CY55	1606	93	6:43:16	15:05:53	8:22:37
06/14/97	CY02	1581	103	6:54:23	17:38:47	10:44:24
06/14/97	CY50	8701	74	7:21:23	14:21:36	7:00:13
06/14/97	CY55	1606	75	6:36:58	13:26:05	6:49:07
06/16/97	CY02	1581	114	7:02:34	17:48:37	10:46:03
06/16/97	CY46	1148	83	7:11:09	15:05:48	7:54:39
06/16/97	CY47	1508	96	7:04:13	16:31:16	9:27:03
06/16/97	CY50	8701	122	7:04:51	18:13:36	11:08:45
06/16/97	CY53	2219	90	7:09:58	15:29:30	8:19:32
06/17/97	CY02	1581	92	7:40:45	16:15:57	8:35:12
06/17/97	CY46	1148	90	7:08:03	15:38:50	8:30:47
06/17/97	CY47	1508	108	7:05:52	16:43:26	9:37:34
06/17/97	CY50	8701	111	7:01:32	16:52:37	9:51:05
06/17/97	CY53	2219	89	6:36:50	15:03:16	8:26:26
06/17/97	CY56	0467	90	7:34:10	16:28:37	8:54:27
06/18/97	CY02	1581	117	7:19:15	18:07:38	10:48:23
06/18/97	CY46	1148	91	7:11:59	17:10:29	9:58:30
06/18/97	CY47	1508	99	7:07:28	17:05:56	9:58:28
06/18/97	CY50	8701	94	7:05:44	15:48:47	8:43:03
06/18/97	CY53	2219	81	6:36:39	14:03:10	7:26:31
06/18/97	CY56	0467	75	7:31:44	14:28:09	6:56:25
06/19/97	CY02	1581	103	6:58:42	16:16:43	9:18:01
06/19/97	CY50	8701	85	7:45:27	17:03:49	9:18:22
06/19/97	CY53	2227	81	7:10:05	17:22:47	10:12:42

Attachment to in Response to MPA/USPS-T13-56

06/19/97	CY56	0498	99	7:34:18	18:35:15	11:00:57
06/20/97	CY02	1581	87	6:49:57	14:46:54	7:56:57
06/20/97	CY46	1148	75	7:07:29	14:14:21	7:06:52
06/20/97	CY50	8701	86	7:11:42	16:10:33	8:58:51
06/20/97	CY56	0498	119	7:16:56	18:47:37	11:30:41
06/21/97	CY02	1581	98	6:40:53	15:50:00	9:09:07
06/21/97	CY46	1148	82	7:11:40	16:07:30	8:55:50
06/21/97	CY47	1508	72	7:04:26	15:32:26	8:28:00
06/21/97	CY50	8701	67	7:30:40	15:26:17	7:55:37
06/21/97	CY53	2227	80	6:38:22	15:16:27	8:38:05
06/21/97	CY56	0498	79	7:27:05	14:47:56	7:20:51
06/23/97	CY02	1581	103	6:54:13	16:51:31	9:57:18
06/23/97	CY46	1148	77	7:07:11	14:56:10	7:48:59
06/23/97	CY47	1508	105	7:07:52	16:27:28	9:19:36
06/23/97	CY50	8701	102	7:37:25	16:51:46	9:14:21
06/23/97	CY53	2214	101	6:32:46	15:48:24	9:15:38
06/23/97	CY56	0405	91	7:30:37	15:54:32	8:23:55
06/24/97	CY02	1581	80	7:29:49	15:08:00	7:38:11
06/24/97	CY46	1148	92	7:07:09	15:58:38	8:51:29
06/24/97	CY47	1508	93	7:02:45	16:19:44	9:16:59
06/24/97	CY50	8701	111	7:08:03	16:52:12	9:44:09
06/24/97	CY53	2214	75	6:45:00	13:52:19	7:07:19
06/24/97	CY56	0405	77	7:37:09	15:42:03	8:04:54
06/25/97	CY02	1581	117	6:32:29	16:34:55	10:02:26
06/25/97	CY46	1148	91	7:09:05	15:55:14	8:46:09
06/25/97	CY47	1508	102	7:13:20	16:58:15	9:44:55
06/25/97	CY50	8701	96	7:09:43	15:37:38	8:27:55
06/25/97	CY53	2214	93	6:32:54	14:54:03	8:21:09
06/25/97	CY56	0405	101	7:35:40	16:26:54	8:51:14
06/26/97	CY02	1581	113	6:27:17	17:54:16	11:26:59
06/26/97	CY46	1148	94	7:07:53	17:25:16	10:17:23
06/26/97	CY50	8701	96	7:05:16	15:43:36	8:38:20
06/26/97	CY56	1049	93	7:34:33	15:40:05	8:05:32
06/27/97	CY02	1581	110	6:32:59	16:59:37	10:26:38
06/27/97	CY46	1148	74	7:08:50	15:35:55	8:27:05
06/27/97	CY50	8701	95	7:21:58	16:17:11	8:55:13
06/27/97	CY53	2215	94	6:36:54	16:55:20	10:18:26
06/27/97	CY56	1049	84	7:37:00	15:09:32	7:32:32
06/28/97	CY02	1581	96	6:34:18	15:55:42	9:21:24
06/28/97	CY46	1148	41	8:25:28	14:15:36	5:50:08
06/28/97	CY50	8701	93	7:27:36	15:48:32	8:20:56
06/28/97	CY56	1049	87	7:39:18	15:41:21	8:02:03
06/30/97	CY04	4243	104	6:40:57	16:33:22	9:52:25
06/30/97	CY46	1145	86	7:07:05	15:10:09	8:03:04
06/30/97	CY47	1475	109	7:02:23	17:13:50	10:11:27
06/30/97	CY50	8735	105	7:11:26	16:43:11	9:31:45
06/30/97	CY57	3716	94	7:08:44	15:44:16	8:35:32
06/30/97	CY60	1929	92	7:37:36	16:08:17	8:30:41
07/01/97	CY04	4243	93	7:04:25	15:11:41	8:07:16
07/01/97	CY46	1145	79	7:07:50	17:24:51	10:17:01
07/01/97	CY47	1475	112	7:07:54	17:44:13	10:36:19
07/01/97	CY50	8735	106	7:14:51	16:42:16	9:27:25
07/01/97	CY57	3716	65	7:06:59	14:50:51	7:43:52
07/01/97	CY60	1929	105	7:28:49	17:08:09	9:39:20
07/02/97	CY04	4243	82	7:03:19	14:41:52	7:38:33
07/02/97	CY46	1145	94	6:33:47	15:55:04	9:21:17

Attachment to in Response to MPA/USPS-T13-56

07/02/97	CY50	8735	97	7:36:49	15:51:04	8:14:15
07/02/97	CY57	3716	88	7:06:03	15:10:55	8:04:52
07/03/97	CY46	1145	84	7:07:47	16:11:20	9:03:33
07/03/97	CY47	1475	97	7:13:20	18:02:53	10:49:33
07/03/97	CY50	8735	94	7:07:59	15:55:31	8:47:32
07/03/97	CY57	3709	89	7:03:57	15:55:23	8:51:26
07/03/97	CY60	1913	84	7:40:35	16:01:07	8:20:32
07/05/97	CY04	4243	120	7:12:03	17:45:28	10:33:25
07/05/97	CY46	1145	91	6:16:41	15:47:17	9:30:36
07/05/97	CY47	1475	111	6:35:19	18:35:14	11:59:55
07/05/97	CY50	8735	102	6:36:52	15:47:58	9:11:06
07/05/97	CY57	3709	96	7:01:11	15:25:26	8:24:15
07/05/97	CY60	1913	95	7:37:14	16:51:57	9:14:43
07/07/97	CY04	4243	103	7:11:28	16:32:52	9:21:24
07/07/97	CY46	1145	95	7:02:29	15:48:54	8:46:25
07/07/97	CY47	1475	98	7:03:25	16:50:30	9:47:05
07/07/97	CY50	8735	120	7:09:25	17:31:02	10:21:37
07/07/97	CY57	3707	96	7:03:47	16:08:53	9:05:06
07/07/97	CY60	1901	96	7:31:55	16:35:18	9:03:23
07/08/97	CY04	4243	84	7:06:35	14:57:40	7:51:05
07/08/97	CY46	1145	96	7:04:51	15:56:02	8:51:11
07/08/97	CY47	1475	101	7:01:49	16:53:45	9:51:56
07/08/97	CY50	8735	104	7:38:02	16:53:18	9:15:16
07/08/97	CY57	3707	93	7:08:34	16:01:20	8:52:46
07/08/97	CY60	1901	97	7:34:50	16:42:04	9:07:14
07/09/97	CY04	4243	95	7:07:34	15:28:29	8:20:55
07/09/97	CY46	1145	94	7:02:47	15:30:38	8:27:51
07/09/97	CY47	1475	110	7:03:51	17:31:13	10:27:22
07/09/97	CY50	8735	98	7:24:19	15:50:52	8:26:33
07/09/97	CY57	3707	88	7:05:18	15:02:00	7:56:42
07/09/97	CY60	1901	95	7:35:41	16:38:11	9:02:30
07/10/97	CY04	4243	90	7:18:29	15:32:34	8:14:05
07/10/97	CY46	1145	90	7:06:32	16:50:54	9:44:22
07/10/97	CY47	1475	106	7:03:31	18:10:20	11:06:49
07/10/97	CY50	8735	91	7:01:16	15:43:54	8:42:38
07/10/97	CY57	3704	101	7:32:21	16:20:26	8:48:05
07/10/97	CY60	1917	86	7:34:40	15:52:35	8:17:55
07/11/97	CY04	4243	93	7:04:11	15:31:05	8:26:54
07/11/97	CY46	1145	80	8:37:53	16:30:18	7:52:25
07/11/97	CY47	1475	90	7:07:36	16:32:33	9:24:57
07/11/97	CY50	8735	90	7:06:45	15:37:02	8:30:17
07/11/97	CY57	3704	98	7:27:02	15:56:26	8:29:24
07/12/97	CY04	4243	77	7:06:34	14:16:27	7:09:53
07/12/97	CY46	1145	88	6:07:50	13:46:05	7:38:15
07/12/97	CY47	1475	99	7:05:26	16:33:30	9:28:04
07/12/97	CY50	8735	94	6:55:00	15:39:11	8:44:11
07/12/97	CY57	3704	94	7:32:49	15:53:40	8:20:51
07/12/97	CY60	1917	83	7:32:15	15:16:55	7:44:40
07/14/97	CY04	4243	101	7:09:42	16:34:37	9:24:55
07/14/97	CY46	1145	86	7:06:10	15:02:06	7:55:56
07/14/97	CY47	1475	111	7:03:21	17:45:47	10:42:26
07/14/97	CY50	8735	80	7:10:06	15:37:10	8:27:04
07/15/97	CY04	4243	90	7:05:22	15:32:31	8:27:09
07/15/97	CY46	1145	103	7:06:01	16:18:13	9:12:12
07/15/97	CY47	1475	94	7:06:39	16:18:08	9:11:29
07/15/97	CY50	8735	97	7:05:58	15:32:45	8:26:47

Attachment to in Response to MPA/USPS-T13-56

07/15/97	CY58	8212	95	7:39:13	16:36:37	8:57:24
07/15/97	CY61	4271	80	7:06:01	14:31:34	7:25:33
07/16/97	CY04	4243	90	7:03:21	15:51:34	8:48:13
07/16/97	CY46	1145	93	7:06:57	15:51:45	8:44:48
07/16/97	CY47	1475	98	7:11:13	16:20:16	9:09:03
07/16/97	CY50	8735	100	7:03:24	15:54:15	8:50:51
07/16/97	CY58	8212	107	7:13:52	17:42:46	10:28:54
07/16/97	CY61	4271	78	7:07:11	14:27:29	7:20:18
07/17/97	CY04	4243	91	7:04:05	15:22:58	8:18:53
07/17/97	CY46	1145	103	7:05:51	17:52:55	10:47:04
07/17/97	CY50	8735	13	14:47:24	15:42:52	0:55:28
07/17/97	CY58	8217	84	7:29:53	15:08:19	7:38:26
07/17/97	CY61	2717	88	7:07:56	16:21:27	9:13:31
07/18/97	CY04	4243	88	7:03:36	16:01:36	8:58:00
07/18/97	CY47	1475	91	6:59:17	15:44:01	8:44:44
07/18/97	CY50	8735	94	7:06:44	15:36:30	8:29:46
07/18/97	CY58	8217	95	7:27:28	16:55:47	9:28:19
07/18/97	CY61	2717	83	7:04:15	14:39:58	7:35:43
07/19/97	CY04	4243	70	7:05:09	14:12:58	7:07:49
07/19/97	CY47	1475	95	7:02:19	16:20:40	9:18:21
07/19/97	CY50	8735	94	7:06:05	15:29:51	8:23:46
07/19/97	CY58	8217	79	7:27:57	14:34:23	7:06:26
07/19/97	CY61	2717	63	7:03:56	12:59:50	5:55:54
07/21/97	CY04	4243	109	6:04:43	16:20:22	10:15:39
07/21/97	CY46	1145	111	6:30:18	16:42:00	10:11:42
07/21/97	CY47	1475	106	7:05:09	17:13:53	10:08:44
07/21/97	CY58	8218	107	7:39:40	17:06:45	9:27:05
07/21/97	CY61	4275	93	7:02:10	17:03:43	10:01:33
07/22/97	CY04	4243	89	7:04:09	15:06:48	8:02:39
07/22/97	CY46	1145	107	6:33:14	16:29:59	9:56:45
07/22/97	CY47	1475	99	7:02:36	16:07:18	9:04:42
07/22/97	CY58	8218	94	7:32:05	16:26:10	8:54:05
07/22/97	CY61	4275	95	7:03:59	16:00:27	8:56:28
07/23/97	CY04	4243	90	7:09:07	15:29:58	8:20:51
07/23/97	CY46	1145	91	7:05:51	15:33:18	8:27:27
07/23/97	CY47	1475	102	7:03:42	16:12:18	9:08:36
07/23/97	CY58	8218	97	7:44:49	16:32:58	8:48:09
07/23/97	CY61	4275	91	7:04:17	15:49:09	8:44:52
07/24/97	CY04	4243	92	7:05:29	15:35:22	8:29:53
07/24/97	CY46	1145	93	7:07:21	17:27:15	10:19:54
07/24/97	CY50	8735	93	7:38:06	15:58:45	8:20:39
07/24/97	CY58	8221	57	7:33:11	14:06:28	6:33:17
07/24/97	CY61	4273	87	7:09:35	15:59:34	8:49:59
07/25/97	CY04	4243	87	7:02:24	15:44:34	8:42:10
07/25/97	CY47	1475	93	7:02:42	15:56:48	8:54:06
07/25/97	CY50	8735	88	7:24:58	15:23:09	7:58:11
07/25/97	CY58	8221	55	7:31:45	13:14:30	5:42:45
07/25/97	CY61	4273	86	7:08:29	15:33:00	8:24:31
07/26/97	CY04	4243	93	6:22:13	15:09:59	8:47:46
07/26/97	CY46	1145	79	7:06:52	15:50:30	8:43:38
07/26/97	CY47	1475	103	7:05:50	16:45:13	9:39:23
07/26/97	CY58	8221	56	7:31:24	13:08:57	5:37:33
07/28/97	CY04	4234	90	7:20:52	15:41:43	8:20:51
07/28/97	CY46	1132	102	6:37:47	17:41:46	11:03:59
07/28/97	CY47	1586	93	7:02:33	15:33:00	8:30:27
07/28/97	CY50	8759	107	7:06:59	17:07:28	10:00:29

Attachment to in Response to MPA/USPS-T13-56

07/28/97	CY59	0320	105	6:41:52	16:27:12	9:45:20
07/28/97	CY62	0406	102	7:02:35	16:47:53	9:45:18
07/29/97	CY04	4234	88	7:19:56	15:48:01	8:28:05
07/29/97	CY46	1132	97	7:07:59	16:20:48	9:12:49
07/29/97	CY47	1586	97	7:06:09	16:15:35	9:09:26
07/29/97	CY50	8759	113	7:05:00	17:20:31	10:15:31
07/29/97	CY59	0320	96	6:31:18	15:44:52	9:13:34
07/29/97	CY62	0406	100	6:07:04	15:39:59	9:32:55
07/30/97	CY04	4234	93	7:16:46	15:43:29	8:26:43
07/30/97	CY46	1132	82	7:03:20	16:05:24	9:02:04
07/30/97	CY47	1586	76	7:03:39	14:00:07	6:56:28
07/30/97	CY59	0320	94	6:34:36	15:32:51	8:58:15
07/30/97	CY62	0406	51	7:22:12	11:58:40	4:36:28
07/31/97	CY04	4234	87	7:19:48	15:38:32	8:18:44
07/31/97	CY46	1132	85	7:08:49	14:56:26	7:47:37
07/31/97	CY47	1586	96	7:03:14	15:29:41	8:26:27
07/31/97	CY50	8739	92	7:46:06	16:06:52	8:20:46
07/31/97	CY59	0305	86	6:31:49	14:46:34	8:14:45
07/31/97	CY62	0415	110	6:54:16	17:52:39	10:58:23
08/01/97	CY04	4234	94	7:18:03	15:46:59	8:28:56
08/01/97	CY46	1132	79	7:07:18	15:03:48	7:56:30
08/01/97	CY47	1586	91	7:02:43	15:29:28	8:26:45
08/01/97	CY50	8759	100	7:03:09	15:48:12	8:45:03
08/01/97	CY59	0305	98	6:28:42	15:43:47	9:15:05
08/01/97	CY62	0415	108	6:53:55	16:44:10	9:50:15
08/02/97	CY04	4234	92	7:16:49	15:50:08	8:33:19
08/02/97	CY46	1132	75	7:04:09	14:19:14	7:15:05
08/02/97	CY47	1586	87	6:59:58	14:57:50	7:57:52
08/02/97	CY50	8759	95	7:02:58	15:41:30	8:38:32
08/02/97	CY59	0305	92	6:31:02	15:37:34	9:06:32
08/02/97	CY62	0415	96	6:52:53	16:53:32	10:00:39
08/04/97	CY04	4234	99	6:37:07	15:53:28	9:16:21
08/04/97	CY46	1132	80	7:04:42	14:45:30	7:40:48
08/04/97	CY47	1586	96	7:05:00	15:34:41	8:29:41
08/04/97	CY59	2417	91	6:34:14	15:26:17	8:52:03
08/04/97	CY62	0424	103	6:59:48	16:42:28	9:42:40
08/05/97	CY04	4234	95	7:17:37	17:19:39	10:02:02
08/05/97	CY46	1132	90	7:06:10	16:10:29	9:04:19
08/05/97	CY47	1586	94	7:01:07	15:33:37	8:32:30
08/05/97	CY50	8759	95	7:09:02	15:36:12	8:27:10
08/05/97	CY59	2417	83	6:34:24	14:43:16	8:08:52
08/05/97	CY62	0424	98	6:44:23	16:11:30	9:27:07
08/06/97	CY04	4234	92	7:17:13	15:37:49	8:20:36
08/06/97	CY46	1132	90	6:35:54	15:06:09	8:30:15
08/06/97	CY47	1586	86	7:05:13	15:15:36	8:10:23
08/06/97	CY50	8759	105	7:08:30	16:29:06	9:20:36
08/06/97	CY59	2417	89	7:08:52	16:05:54	8:57:02
08/06/97	CY62	0424	87	6:39:51	14:54:31	8:14:40
08/07/97	CY04	4234	95	7:20:33	16:11:02	8:50:29
08/07/97	CY46	1132	84	7:14:08	14:52:00	7:37:52
08/07/97	CY47	1586	70	7:04:03	14:28:28	7:24:25
08/07/97	CY50	8759	103	7:06:28	16:26:20	9:19:52
08/07/97	CY59	2402	78	6:36:13	14:29:52	7:53:39
08/07/97	CY62	0426	94	6:57:12	15:13:21	8:16:09
08/08/97	CY04	4234	94	7:16:00	15:46:11	8:30:11
08/08/97	CY46	1132	76	7:04:33	16:13:39	9:09:06

Attachment to in Response to MPA/USPS-T13-56

08/08/97	CY47	1586	79	7:01:22	15:47:12	8:45:50
08/08/97	CY50	8759	94	7:12:20	16:08:40	8:56:20
08/08/97	CY59	2402	75	6:34:14	14:03:12	7:28:58
08/08/97	CY62	0426	84	6:39:21	14:31:44	7:52:23
08/09/97	CY04	4234	92	7:15:49	15:43:48	8:27:59
08/09/97	CY46	1132	82	7:05:55	14:30:10	7:24:15
08/09/97	CY47	1586	75	7:09:14	14:52:44	7:43:30
08/09/97	CY50	8759	94	7:08:29	16:04:14	8:55:45
08/09/97	CY59	2402	72	6:38:37	14:28:48	7:50:11
08/09/97	CY62	0426	79	6:48:47	14:12:30	7:23:43
08/11/97	CY04	4234	109	6:34:13	16:42:40	10:08:27
08/11/97	CY46	1132	88	7:11:42	16:10:15	8:58:33
08/11/97	CY47	1586	94	6:47:21	15:53:57	9:06:36
08/11/97	CY50	8759	110	7:08:53	17:14:47	10:05:54
08/11/97	CY64	1401	90	7:06:09	16:48:23	9:42:14
08/12/97	CY04	4234	89	6:33:03	15:48:23	9:15:20
08/12/97	CY46	1132	94	7:01:54	15:52:22	8:50:28
08/12/97	CY47	1586	90	7:06:01	16:02:07	8:56:06
08/12/97	CY50	8759	110	7:11:31	16:55:59	9:44:28
08/12/97	CY63	0825	94	6:36:23	15:08:13	8:31:50
08/12/97	CY64	1401	95	7:02:53	16:30:03	9:27:10
08/13/97	CY04	4234	82	7:18:00	15:50:16	8:32:16
08/13/97	CY46	1132	79	7:09:08	15:38:34	8:29:26
08/13/97	CY47	1586	76	7:09:30	13:57:37	6:48:07
08/13/97	CY50	8759	103	7:10:42	16:23:28	9:12:46
08/13/97	CY63	0825	94	6:37:35	15:14:18	8:36:43
08/13/97	CY64	1401	92	6:36:42	15:42:10	9:05:28
08/14/97	CY04	4234	97	7:19:42	16:42:02	9:22:20
08/14/97	CY46	1132	92	7:02:51	15:39:23	8:36:32
08/14/97	CY47	1586	95	7:04:04	15:30:47	8:26:43
08/14/97	CY50	8759	100	7:03:38	16:12:24	9:08:46
08/14/97	CY63	0825	89	6:33:55	14:18:29	7:44:34
08/14/97	CY64	2407	73	7:01:57	14:41:05	7:39:08
08/15/97	CY04	4234	111	7:18:13	18:28:06	11:09:53
08/15/97	CY46	1132	86	6:07:44	16:12:07	10:04:23
08/15/97	CY47	1586	90	7:03:38	15:23:23	8:19:45
08/15/97	CY63	0825	74	7:01:02	13:56:19	6:55:17
08/15/97	CY64	2407	77	7:03:15	14:48:03	7:44:48
08/16/97	CY04	4234	92	7:21:00	15:42:27	8:21:27
08/16/97	CY46	1132	75	7:04:11	14:43:40	7:39:29
08/16/97	CY47	1586	77	7:03:40	14:25:49	7:22:09
08/16/97	CY50	8759	91	6:38:12	15:38:41	9:00:29
08/16/97	CY63	0825	74	7:02:53	13:47:23	6:44:30
08/16/97	CY64	2407	97	6:58:56	16:16:13	9:17:17
08/18/97	CY04	4234	117	6:34:31	17:47:37	11:13:06
08/18/97	CY46	1132	87	7:07:28	15:42:50	8:35:22
08/18/97	CY63	0825	97	6:34:04	15:21:58	8:47:54
08/18/97	CY64	1457	90	7:06:06	17:20:39	10:14:33
08/19/97	CY04	4234	90	7:23:21	15:30:54	8:07:33
08/19/97	CY46	1132	96	7:06:03	16:02:50	8:56:47
08/19/97	CY47	1586	81	7:03:43	14:45:42	7:41:59
08/19/97	CY63	0825	81	6:34:20	15:52:47	9:18:27
08/19/97	CY64	1457	94	7:08:12	15:38:12	8:30:00
08/20/97	CY04	4234	91	7:17:07	15:48:32	8:31:25
08/20/97	CY46	1132	91	7:07:30	16:01:43	8:54:13
08/20/97	CY47	1586	60	7:06:36	14:16:27	7:09:51

Attachment to in Response to MPA/USPS-T13-56

08/20/97	CY50	8759	103	7:08:48	16:05:47	8:56:59
08/20/97	CY63	0825	84	6:34:54	14:15:29	7:40:35
08/20/97	CY64	1457	94	7:03:15	16:00:44	8:57:29
08/21/97	CY04	4234	96	7:20:33	15:49:54	8:29:21
08/21/97	CY46	1132	88	7:05:45	16:15:02	9:09:23
08/21/97	CY47	1586	56	7:57:42	14:41:44	6:44:02
08/21/97	CY63	0827	100	7:04:07	15:43:02	8:38:55
08/21/97	CY64	2411	79	7:03:42	14:43:46	7:40:04
08/22/97	CY04	4234	100	7:20:25	18:45:03	11:24:38
08/22/97	CY46	1132	80	7:04:21	15:55:49	8:51:28
08/22/97	CY47	1586	59	7:15:40	15:14:46	7:59:06
08/22/97	CY50	8759	75	7:07:08	13:56:57	6:49:49
08/22/97	CY63	0827	92	7:06:31	15:32:59	8:26:28
08/22/97	CY64	2411	86	7:09:52	15:56:06	8:46:14
08/23/97	CY46	1132	78	6:47:53	15:09:41	8:21:48
08/23/97	CY50	8759	75	7:06:12	13:56:56	6:50:44
08/23/97	CY63	0827	92	7:06:33	15:27:21	8:20:48
08/23/97	CY64	2411	94	7:00:24	16:43:39	9:43:15
08/25/97	CY04	4234	111	7:33:17	18:03:32	10:30:15
08/25/97	CY46	1142	102	7:09:42	16:36:51	9:27:09
08/25/97	CY47	1507	103	7:03:35	16:29:20	9:25:45
08/25/97	CY50	8744	101	7:12:16	15:57:53	8:45:37
08/25/97	CY63	0822	98	6:38:54	15:29:50	8:50:56
08/26/97	CY04	4254	94	6:34:48	15:49:52	9:15:04
08/26/97	CY46	1142	82	7:25:53	15:30:55	8:05:02
08/26/97	CY47	1507	95	7:05:29	16:43:53	9:38:24
08/26/97	CY50	8744	107	7:08:31	16:41:09	9:32:38
08/26/97	CY63	0822	90	6:41:12	14:55:38	8:14:26
08/27/97	CY04	4254	112	7:35:40	18:01:47	10:26:07
08/27/97	CY46	1142	100	7:05:42	16:24:13	9:18:31
08/27/97	CY47	1507	83	7:00:58	15:25:11	8:24:13
08/27/97	CY50	8744	78	7:08:03	13:59:01	6:50:58
08/27/97	CY63	0822	92	6:33:50	14:59:59	8:26:09
08/28/97	CY04	4254	91	7:35:35	16:24:06	8:48:31
08/28/97	CY46	1142	87	7:07:02	16:01:13	8:54:11
08/28/97	CY47	1507	82	7:09:32	15:53:32	8:44:00
08/28/97	CY50	8744	97	7:06:58	16:27:50	9:20:52
08/28/97	CY63	0831	93	6:39:01	19:43:18	13:04:17
08/29/97	CY04	4254	94	7:38:26	16:34:43	8:56:17
08/29/97	CY46	1142	85	7:05:37	16:01:17	8:55:40
08/29/97	CY47	1507	94	7:03:48	17:51:39	10:47:51
08/29/97	CY50	8744	89	7:05:57	15:44:57	8:39:00
08/29/97	CY63	0831	117	6:38:51	17:09:29	10:30:38
08/30/97	CY04	4254	94	7:37:12	16:32:31	8:55:19
08/30/97	CY46	1142	101	7:05:33	16:53:06	9:47:33
08/30/97	CY47	1507	91	7:08:09	16:55:18	9:47:09
08/30/97	CY50	8744	100	8:14:05	17:09:23	8:55:18
08/30/97	CY63	0831	98	6:08:44	14:46:42	8:37:58
09/02/97	CY04	4254	126	6:35:59	19:50:07	13:14:08
09/02/97	CY46	1142	104	6:10:30	17:20:39	11:10:09
09/02/97	CY47	1507	117	6:05:22	17:57:04	11:51:42
09/02/97	CY50	8744	108	7:09:46	16:54:14	9:44:28
09/02/97	CY63	0828	100	7:43:39	18:36:32	10:52:53
09/03/97	CY04	4254	108	6:34:17	17:06:38	10:32:21
09/03/97	CY46	1142	87	7:06:32	16:28:14	9:21:42
09/03/97	CY47	1507	80	7:04:50	17:04:33	9:59:43

Attachment to in Response to MPA/USPS-T13-56

09/03/97	CY50	8744	112	7:06:11	17:15:39	10:09:28
09/03/97	CY63	0828	105	7:03:24	16:32:57	9:29:33
09/04/97	CY04	4254	104	6:35:07	17:08:56	10:33:49
09/04/97	CY46	1142	87	6:15:29	15:49:58	9:34:29
09/04/97	CY47	1507	91	7:02:57	17:34:24	10:31:27
09/04/97	CY50	8744	106	7:10:48	16:37:52	9:27:04
09/04/97	CY63	0807	93	7:10:45	15:35:21	8:24:36
09/05/97	CY04	4254	110	7:30:45	18:02:16	10:31:31
09/05/97	CY46	1142	94	6:43:06	15:41:00	8:57:54
09/05/97	CY50	8744	111	7:10:52	17:18:16	10:07:24
09/05/97	CY63	0807	93	7:06:21	15:37:20	8:30:59
09/06/97	CY04	4254	101	7:20:54	16:37:14	9:16:20
09/06/97	CY46	1142	106	6:05:27	16:40:15	10:34:48
09/06/97	CY47	1507	44	7:06:08	11:13:32	4:07:24
09/06/97	CY50	8744	93	7:14:41	16:00:24	8:45:43
09/06/97	CY63	0807	94	7:09:54	15:30:55	8:21:01
09/08/97	CY04	4254	94	7:30:52	16:02:27	8:31:35
09/08/97	CY46	1142	104	6:26:08	16:16:59	9:50:51
09/08/97	CY47	1507	107	7:03:47	17:11:07	10:07:20
09/08/97	CY50	8744	100	7:33:48	16:31:17	8:57:29
09/08/97	CY63	0830	103	6:48:43	16:27:56	9:39:13
09/09/97	CY04	4254	117	7:31:00	18:05:49	10:34:49
09/09/97	CY46	1142	94	7:05:42	16:46:14	9:40:32
09/09/97	CY50	8744	112	7:08:15	16:53:39	9:45:24
09/09/97	CY63	0830	112	6:47:02	16:50:28	10:03:26
09/10/97	CY04	4254	110	6:32:20	16:58:18	10:25:58
09/10/97	CY46	1142	98	7:05:04	17:02:12	9:57:08
09/10/97	CY47	1507	93	7:06:58	16:12:42	9:05:44
09/10/97	CY50	8744	102	7:13:16	16:24:03	9:10:47
09/10/97	CY63	0830	104	6:45:27	15:54:27	9:09:00
09/11/97	CY04	4254	88	7:16:32	15:46:04	8:29:32
09/11/97	CY46	1142	92	7:07:25	16:29:14	9:21:49
09/11/97	CY47	1507	106	7:12:09	18:25:48	11:13:39
09/11/97	CY50	8744	108	7:19:48	17:05:18	9:45:30
09/11/97	CY63	0824	83	6:40:11	15:29:50	8:49:39
09/12/97	CY04	4254	85	7:47:18	16:23:09	8:35:51
09/12/97	CY46	1142	101	7:06:16	17:44:49	10:38:33
09/12/97	CY50	8744	92	6:59:56	16:22:30	9:22:34
09/12/97	CY63	0824	94	6:40:04	15:07:54	8:27:50
09/13/97	CY04	4254	87	7:38:57	16:27:30	8:48:33
09/13/97	CY46	1142	102	7:02:30	17:13:09	10:10:39
09/13/97	CY47	1507	94	7:14:02	18:06:38	10:52:36
09/13/97	CY50	8744	83	7:11:45	14:59:09	7:47:24
09/13/97	CY63	0824	88	6:40:49	14:56:49	8:16:00
09/15/97	CY46	1142	105	7:06:11	16:59:24	9:53:13
09/15/97	CY50	8744	100	8:27:44	17:57:05	9:29:21
09/15/97	CY63	0820	94	7:08:14	15:37:37	8:29:23
09/16/97	CY46	1142	105	7:06:08	17:29:11	10:23:03
09/16/97	CY50	8744	112	7:12:45	17:27:01	10:14:16
09/16/97	CY63	0820	90	7:44:21	15:37:45	7:53:24
09/17/97	CY46	1142	94	7:01:51	15:45:33	8:43:42
09/17/97	CY50	8744	113	7:10:59	17:18:00	10:07:01
09/17/97	CY63	0820	80	7:07:17	14:36:45	7:29:28
09/18/97	CY46	1142	86	7:02:32	15:41:35	8:39:03
09/18/97	CY50	8744	101	7:16:18	16:35:05	9:18:47
09/18/97	CY63	0811	97	7:13:58	17:23:19	10:09:21

Attachment to in Response to MPA/USPS-T13-56

09/19/97	CY46	1142	84	7:07:28	15:28:15	8:20:47
09/19/97	CY50	8744	96	7:12:45	15:44:40	8:31:55
09/19/97	CY63	0811	90	7:10:44	16:45:40	9:34:56
09/20/97	CY46	1142	66	9:37:21	16:23:54	6:46:33
09/20/97	CY50	8744	74	7:09:26	15:28:38	8:19:12
09/20/97	CY63	0811	93	6:41:21	15:07:39	8:26:18
10/07/97	CY04	4945	104	6:31:45	17:14:03	10:42:18
10/08/97	CY04	4931	75	7:37:19	16:48:07	9:10:48
10/09/97	CY04	4940	102	6:45:52	17:48:42	11:02:50
10/10/97	CY04	4908	93	7:07:56	16:28:57	9:21:01
10/15/97	CY04	4912	98	7:57:36	17:38:14	9:40:38
10/16/97	CY04	4944	92	6:51:15	16:34:23	9:43:08
10/20/97	CY04	4920	102	6:40:53	17:38:31	10:57:38
10/20/97	CY50	8705	99	7:48:51	18:13:20	10:24:29
10/21/97	CY04	4917	88	7:19:15	16:35:21	9:16:06
10/21/97	CY50	8714	102	6:49:31	16:58:25	10:08:54
10/22/97	CY04	4909	71	7:36:59	15:49:50	8:12:51
10/22/97	CY04	4916	88	7:58:09	16:50:14	8:52:05
10/22/97	CY50	8703	85	7:45:10	16:11:26	8:26:16
10/23/97	CY04	4910	102	6:39:40	16:57:36	10:17:56
10/23/97	CY04	4926	90	7:02:43	16:23:32	9:20:49
10/23/97	CY50	8726	98	7:15:12	16:58:53	9:43:41
10/24/97	CY04	4915	104	6:33:38	16:58:01	10:24:23
10/24/97	CY50	8736	89	7:12:50	16:17:04	9:04:14
10/25/97	CY04	4906	88	7:07:09	16:19:35	9:12:26
10/25/97	CY50	8702	94	7:45:56	17:05:22	9:19:26
10/27/97	CY50	8727	102	7:18:34	17:30:37	10:12:03
10/27/97	CY53	2201	90	6:44:56	15:38:48	8:53:52
10/28/97	CY50	8748	91	6:42:07	15:48:20	9:06:13
10/28/97	CY53	2202	90	6:32:46	16:08:52	9:36:06
10/29/97	CY50	8770	58	7:40:41	13:16:58	5:36:17
10/29/97	CY53	2203	82	6:38:09	16:11:10	9:33:01
10/30/97	CY50	8747	72	8:02:23	16:48:06	8:45:43
10/30/97	CY53	2206	104	7:01:27	17:22:26	10:20:59
10/31/97	CY50	8729	92	6:47:20	16:02:02	9:14:42
10/31/97	CY53	2207	93	7:04:30	16:32:14	9:27:44
11/01/97	CY50	8711	101	7:05:31	18:06:50	11:01:19
11/01/97	CY53	2211	88	6:33:36	15:02:32	8:28:56
11/03/97	CY53	2205	97	6:39:29	17:16:13	10:36:44
11/04/97	CY50	8756	106	7:25:57	18:08:57	10:43:00
11/04/97	CY53	2212	76	6:36:33	14:39:25	8:02:52
11/05/97	CY50	8717	94	7:13:16	16:28:43	9:15:27
11/05/97	CY53	2210	79	7:43:44	16:44:40	9:00:56
11/06/97	CY50	8744	98	7:14:00	17:24:00	10:10:00
11/06/97	CY53	2213	80	7:06:30	15:52:04	8:45:34
11/07/97	CY50	8735	95	7:11:38	17:06:14	9:54:36
11/07/97	CY53	2214	89	6:34:32	16:05:11	9:30:39
11/08/97	CY50	8701	85	7:07:30	15:38:55	8:31:25
11/08/97	CY53	2215	98	6:33:24	16:10:30	9:37:06
11/10/97	CY50	8759	107	7:34:41	18:27:08	10:52:27
11/10/97	CY53	2216	91	7:09:04	16:05:59	8:56:55
11/12/97	CY50	8702	97	7:45:52	17:32:46	9:46:54
11/12/97	CY53	2219	87	6:45:48	17:23:04	10:37:16
11/12/97	CY63	0823	86	6:35:43	16:30:35	9:54:52
11/12/97	CY66	0129	86	7:45:45	16:28:10	8:42:25
11/13/97	CY53	2221	95	6:49:56	16:37:03	9:47:07

Attachment to in Response to MPA/USPS-T13-56

11/13/97	CY63	0821	84	6:10:01	15:33:43	9:23:42
11/14/97	CY53	2224	87	7:29:24	15:56:21	8:26:57
11/14/97	CY63	0803	100	6:41:37	17:12:12	10:30:35
11/14/97	CY66	0130	88	7:35:53	19:44:34	12:08:41
11/15/97	CY53	2225	61	6:39:49	15:46:28	9:06:39
11/15/97	CY63	0806	86	6:03:47	14:42:43	8:38:56
11/15/97	CY66	0131	37	8:42:04	12:25:35	3:43:31
11/17/97	CY63	0832	106	6:47:29	19:16:07	12:28:38
11/18/97	CY63	0817	82	7:15:41	15:52:40	8:36:59
11/19/97	CY63	0815	72	7:10:41	15:30:47	8:20:06
11/20/97	CY63	0816	79	7:07:32	16:43:22	9:35:50
11/21/97	CY63	0809	91	7:08:15	18:33:41	11:25:26
11/22/97	CY63	0808	94	7:05:57	16:36:36	9:30:39
11/24/97	CY04	4945	116	6:35:46	19:12:24	12:36:38
11/24/97	CY63	0801	95	7:37:31	17:33:04	9:55:33
11/24/97	CY63	0802	109	7:02:32	18:55:00	11:52:28
11/25/97	CY04	4931	112	6:02:47	17:05:52	11:03:05
11/25/97	CY63	0819	109	5:29:12	17:38:58	12:09:46
12/11/97	CY66	0242	84	7:14:17	15:29:22	8:15:05
12/12/97	CY04	4920	116	5:30:23	18:27:03	12:56:40
12/13/97	CY66	0251	82	7:12:22	16:04:26	8:52:04
12/15/97	CY04	4940	122	6:49:02	19:28:16	12:39:14
12/15/97	CY66	0249	124	6:41:09	20:47:29	14:06:20
12/16/97	CY66	0244	83	7:10:41	17:48:32	10:37:51
12/16/97	CY66	0370	93	7:08:11	16:32:23	9:24:12
12/17/97	CY66	0374	70	7:13:04	17:26:54	10:13:50
12/17/97	CY66	0382	95	7:07:47	18:33:50	11:26:03
12/18/97	CY04	4908	99	6:41:58	16:31:55	9:49:57
12/18/97	cy66	0377	84	7:10:23	16:40:21	9:29:58
12/18/97	CY66	0384	89	7:09:49	18:08:02	10:58:13
12/19/97	CY66	0255	80	7:09:42	15:52:41	8:42:59
12/19/97	CY66	0257	87	7:11:27	16:47:34	9:36:07
12/20/97	CY66	0114	61	7:43:17	14:37:57	6:54:40
12/20/97	CY66	0115	72	7:33:37	14:38:22	7:04:45
12/29/97	CY66	0106	109	7:36:52	19:08:13	11:31:21
12/30/97	CY66	0111	93	7:31:01	16:36:16	9:05:15
01/02/98	CY66	0116	90	7:21:32	16:06:10	8:44:38
01/02/98	CY66	0373	105	7:05:42	18:22:49	11:17:07
01/03/98	CY66	0246	89	7:06:35	16:17:50	9:11:15
01/05/98	CY66	0245	81	7:12:15	15:38:01	8:25:46
01/05/98	CY66	0247	90	7:07:34	17:13:27	10:05:53
01/06/98	CY66	0252	78	7:07:51	15:05:46	7:57:55
01/06/98	CY66	0375	85	7:06:08	15:32:43	8:26:35
01/07/98	CY66	0124	84	7:41:29	16:18:58	8:37:29
01/08/98	CY66	0112	88	7:44:30	16:10:11	8:25:41
01/08/98	CY66	0126	64	7:37:47	15:09:54	7:32:07
01/09/98	CY66	0119	93	7:41:48	16:39:08	8:57:20
01/09/98	CY66	0244	86	7:08:42	15:45:57	8:37:15
01/09/98	CY66	0376	72	7:15:06	14:37:08	7:22:02
01/10/98	CY66	0117	98	6:37:05	16:18:52	9:41:47
01/10/98	CY66	0248	94	7:01:47	16:12:05	9:10:18
01/10/98	CY66	0378	92	7:07:25	16:09:48	9:02:23
01/12/98	CY66	0102	101	7:39:29	17:28:22	9:48:53
01/12/98	CY66	0254	94	7:13:53	17:47:01	10:33:08
01/12/98	CY66	0379	85	7:03:22	15:35:13	8:31:51
01/13/98	CY66	0101	80	7:41:25	17:09:24	9:27:59

Attachment to in Response to MPA/USPS-T13-56

01/13/98	CY66	0120	86	7:38:05	16:06:33	8:28:28
01/13/98	CY66	0281	70	7:05:13	14:10:24	7:05:11
01/14/98	CY66	0123	91	7:35:55	17:02:33	9:26:38
01/20/98	CY66	0110	101	6:40:37	16:54:29	10:13:52
01/20/98	CY66	0380	111	6:39:32	18:29:47	11:50:15
01/20/98	CY66	0383	105	6:43:26	17:35:01	10:51:35
01/21/98	CY66	0103	104	7:09:34	17:56:31	10:46:57
01/21/98	CY66	0107	109	7:26:24	17:19:46	9:53:22
01/21/98	CY66	0128	104	7:07:59	17:35:16	10:27:17
01/22/98	CY66	0254	67	7:08:30	13:57:28	6:48:58
01/22/98	CY66	0372	87	7:05:58	16:00:52	8:54:54
01/26/98	CY04	4233	101	8:14:51	18:14:00	9:59:09
01/27/98	CY04	4285	73	8:17:27	16:20:19	8:02:52
01/28/98	CY04	4238	82	6:53:55	15:47:30	8:53:35
01/28/98	CY66	0105	78	7:38:09	16:07:29	8:29:20
01/28/98	CY66	0250	88	7:08:00	16:08:00	9:00:00
01/29/98	CY04	4214	90	6:12:29	15:56:40	9:44:11
01/29/98	CY66	0240	87	7:03:34	15:49:45	8:46:11
01/29/98	CY66	0253	93	7:07:20	16:12:43	9:05:23
01/30/98	CY04	4235	79	7:08:12	15:39:08	8:30:56
01/30/98	CY04	4999	44	8:08:58	14:27:56	6:18:58
01/31/98	CY04	4241	88	7:08:11	17:00:03	9:51:52
02/02/98	CY04	4249	80	7:14:49	16:47:38	9:32:49
02/03/98	CY04	4219	94	7:08:23	17:50:18	10:41:55
02/04/98	CY04	4242	76	6:54:23	15:51:39	8:57:16
02/04/98	CY66	0241	85	7:08:54	15:32:55	8:24:01
02/04/98	CY66	0371	85	7:04:50	15:45:25	8:40:35
02/05/98	CY04	4229	84	7:32:53	16:50:09	9:17:16
02/05/98	CY04	4237	87	7:16:26	17:01:44	9:45:18
02/05/98	CY66	0102	84	7:45:59	16:04:26	8:18:27
02/05/98	CY66	0113	88	7:39:42	16:09:23	8:29:41
02/06/98	CY04	4213	80	7:07:13	16:06:13	8:59:00
02/06/98	CY66	0108	105	7:35:20	18:23:14	10:47:54
02/06/98	CY66	0110	95	7:03:59	16:23:09	9:19:10
02/07/98	CY04	4230	81	6:49:48	14:52:50	8:03:02
02/07/98	CY66	0111	94	7:35:13	17:10:38	9:35:25
02/07/98	CY66	0130	69	8:36:13	15:38:11	7:01:58
02/09/98	CY04	4221	96	7:11:28	19:31:24	12:19:56
02/09/98	CY66	0104	94	7:32:29	17:42:23	10:09:54
02/09/98	CY66	0116	87	7:40:41	16:18:58	8:38:17
02/10/98	CY04	4207	90	7:52:09	16:43:11	8:51:02
02/11/98	CY04	4222	89	7:30:16	16:50:13	9:19:57
02/12/98	CY04	4228	95	6:55:45	16:27:47	9:32:02
02/18/98	CY04	4232	97	7:06:57	16:54:51	9:47:54
02/20/98	CY04	4218	79	6:58:50	18:01:16	11:02:26
02/21/98	CY04	4254	17	13:37:03	15:25:22	1:48:19
02/23/98	CY04	4225	91	6:37:04	17:26:20	10:49:16
02/24/98	CY04	4248	84	6:48:58	15:59:30	9:10:32
02/27/98	CY04	4224	88	7:19:09	16:25:59	9:06:50
03/02/98	CY04	4225	86	7:58:38	17:46:15	9:47:37
03/04/98	CY04	4236	83	7:22:37	16:06:23	8:43:46
03/09/98	CY04	4257	97	6:43:22	16:44:14	10:00:52
03/10/98	CY04	4258	81	7:07:23	17:01:10	9:53:47
03/11/98	CY04	4259	90	6:42:48	18:46:15	12:03:27
03/11/98	CY04	4262	92	6:37:40	16:54:26	10:16:46
03/12/98	CY04	4265	87	7:13:14	19:57:58	12:44:44

Attachment to in Response to MPA/USPS-T13-56

03/12/98	CY04	4917	14	16:03:01	20:11:06	4:08:05
03/19/98	CY66	0256	60	7:05:03	18:00:09	10:55:06
03/20/98	CY66	0243	87	7:08:29	16:05:32	8:57:03
04/22/98	CY04	4211	76	8:04:18	16:17:25	8:13:07
04/23/98	CY04	4272	52	8:43:03	13:50:14	5:07:11

1 CHAIRMAN GLEIMAN: Is there anyone else?

2 [No response.]

3 CHAIRMAN GLEIMAN: If not, that brings us to oral
4 cross examination. The following parties have requested
5 oral cross examination: Advo, Inc., the Newspaper
6 Association of America, the Office of the Consumer Advocate,
7 the Periodicals Mailers Group, and United Parcel Service.

8 Is there any other party that wishes to cross
9 examine the witness?

10 [No response.]

11 CHAIRMAN GLEIMAN: If not, Mr. McLaughlin,
12 whenever you're ready, you may proceed.

13 BY MR. McLAUGHLIN [Resuming]:

14 Q Good afternoon, Mr. Raymond. Just a couple of
15 very general -- and these are not tricky questions, just
16 startup questions.

17 The data that you have in Library Reference 163,
18 that was collected as part of a larger project that was
19 known as Engineered Standards or Delivery Redesign; is that
20 correct?

21 A Yes, it was, sir.

22 Q And that had -- there were several different
23 purposes for that broader project, one of which was, for
24 example, to develop Engineered Standards or time standards
25 and things like that; that there were some other purposes

1 to, in fact, make it into later on in confidential sessions;
2 is that correct?

3 A Yes, it had many purposes.

4 Q Okay. And you looked at a lot of different routes
5 in a number of different cities?

6 A Correct.

7 Q I'd like to refer you to page 14 of your
8 testimony, lines 5 and 6.

9 A Okay.

10 Q There you state -- this was filed, by the way, on
11 January 12th, is that correct?

12 A Yes.

13 Q You state there, and I quote, "Over the course of
14 the project 844 route days of street information was
15 collected through one day and multiple day studies of
16 routes."

17 Do you see that statement?

18 A Yes.

19 Q Is that a correct statement?

20 A Yes.

21 Q What do you mean by "over the course of the
22 project" 844 route days of information was collected? What
23 project are you referring to there?

24 A The Delivery Redesign Engineered Standards
25 Project.

1 Q So it is your statement that during the course of
2 the Delivery Redesign Project 844 route days of information
3 were collected?

4 A Yes.

5 Q Could you turn to your response to ADVO
6 Interrogatory 16?

7 There you were asked about changes that were made
8 in the dataset and in response to part (c) of that question,
9 you make the statement, "No full route days were purged."

10 Is that a correct statement?

11 A Using my definition of "purge" at this point in
12 time in developing my testimony, yes, I feel that that was a
13 correct answer.

14 Q What do mean by using your definition of "purged"?
15 How do you define the word "purge"?

16 A The dataset that I am referring to in my testimony
17 is the dataset that was given to Witness Baron, of which
18 there were 844 route days worth of data that pertains to
19 this testimony.

20 Q In other words, you are saying that of the data
21 that was given to Witness Baron, within that dataset no full
22 records were purged?

23 A Correct.

24 Q Isn't that almost a tautology? What you are
25 saying is the records you gave to Witness Baron did not have

1 anything that you didn't give to Witness Baron?

2 A Do me a favor and see if you could rephrase your
3 question so I might be able to grasp what your intent of the
4 question is, please.

5 Q Were any records purged from the database before
6 you gave it to Mr. Baron?

7 A There are a significant number of records in the
8 database that are outside of the scope of the information
9 that was requested by Mr. Baron, so the dataset that Mr.
10 Baron ended up with was 844 route days worth of data but the
11 study was much larger in its capacity or mass of information
12 that was collected.

13 Q So in fact there were more than 844 days of data
14 that were collected?

15 A In the total study, yes, there were more than 844
16 days worth of data in the total study that was collected.

17 Q Let's go back -- I don't want to beat this to
18 death -- back to your testimony in 14 where you say, "Over
19 the course of the project 844 route days of street
20 information was collected."

21 Isn't it correct that more than 844 days of street
22 time data was collected over the course of the project?

23 A We were given a definition of what a street time
24 set of records was supposed to represent so that if in
25 looking at our records there will be some additional days'

1 worth of data in the entire dataset that were outside the
2 scope of the records that were requested for the street time
3 survey.

4 Q Mr. Raymond, can you point to me where in your
5 initial testimony you discuss any criteria that were given
6 to you or that you discussed with Witness Baron about what
7 kinds of route data should be included in the database and
8 what kinds of route data should be included in the database
9 and what kinds of route data should not be included in the
10 database?

11 That is not in your testimony, is it?

12 A No. I did not specify which other records are in
13 the entire database that were left out of the dataset. I
14 only have described the data that was given to Witness
15 Baron.

16 Q And when asked if any records had been purged, you
17 said no records were purged?

18 A Records have not been purged from our database.
19 The records are still in the database.

20 Q What do you mean by your database? Are you
21 referring to the ES database or are you referring to the
22 Library Reference 163 database?

23 A I am referring to the entire database.

24 Q I'm still confused. You say no records were
25 purged from the entire database. What do you mean by that?

1 When you say entire database, are you referring to the
2 entire ES database beyond what was provided to Witness
3 Baron?

4 A Yes, and I said my testimony refers to the
5 database that was given to Witness Baron.

6 Q Weren't those omitted records that were not
7 included in the information given to Baron, weren't they in
8 essence "purged" from the ES database that was given to
9 Witness Baron?

10 A No, I do not feel that they were "purged" from the
11 database. They were not given to Witness Baron in the
12 beginning.

13 Q Where did you tell us that there were additional
14 observations that had not been included?

15 A I say my testimony refers to the dataset that was
16 given to Witness Baron.

17 Q Please refer to your response to MPA-48. This
18 response I believe was filed by you or filed by the Postal
19 Service on March 2nd? Do you see that?

20 [Pause.]

21 BY MR. McLAUGHLIN:

22 Q The question -- do you have that?

23 A I haven't been able to find it yet. It's probably
24 in here somewhere.

25 THE WITNESS: For some reason I seem to be having

1 difficulty finding Number 48.

2 MR. McLAUGHLIN: Is it possible for counsel to
3 provide him with a copy?

4 [Pause.]

5 BY MR. McLAUGHLIN:

6 Q There you were asked by MPA to state whether any
7 records made during the course of the study were purged from
8 the dataset and to please state how many records were purged
9 from the dataset.

10 Your answer in the first sentence was, "Records
11 were purged from the database." Do you see that?

12 A But I think I have an opportunity to say that
13 maybe here's another one that I need to make a correction
14 on, because the original dataset that we have has all the
15 records in it that were made from the field entries. They
16 were not purged.

17 Records were modified but they were not purged.

18 Q If you look at MPA-48, it refers to records made
19 during the course of the study and then it refers to whether
20 they were purged from the dataset. Isn't there a
21 distinction there between the study and the dataset?

22 A Maybe I was confused at this point, but I look at
23 the study as I am going through these interrogatories and I
24 may have got confused between what is in the entire
25 engineering dataset. You stated that you have been

1 confused. I, likewise, may get confused at times. I, in
2 preparing this, was referring to the study that was done and
3 the data that was given to Mr. Baron.

4 Q Well, I might say -- I know Mr. Chairman is not
5 here -- we were also quite surprised to find very late on
6 that apparently, contrary to our earlier understandings,
7 there was data not included in the dataset that had been
8 collected.

9 When was the -- you say in response to MPA-48, "A
10 count of these records that were purged from the database
11 were not maintained."

12 Now what did you mean by that?

13 Do you know how many total records were collected
14 during the course of the ES study and do you know how many
15 were given to Witness Baron?

16 A There were 39,046 records that were given to
17 Witness Baron. Okay? I believe that is the number of
18 records that was stated.

19 Now if I look at our information that we have, we
20 have manual records of records that were modified based upon
21 requested edits from the data collection process that was
22 done in the field between the field and our data
23 coordinators.

24 These records -- I say the records exist in the
25 database, the records that were modified in the database,

1 but we don't go around dropping records out of the database,
2 and sometimes I do get confused when I am referring to which
3 study I am referring to in answering these interrogatories.

4 Q Well, believe me, we thought we understood what we
5 were dealing with and now we suddenly find we don't.

6 Please turn to ADVO, your response to ADVO Number
7 32.

8 A Yes.

9 Q Do you have that?

10 COMMISSIONER LeBLANC: Mr. McLaughlin, that was
11 32?

12 MR. McLAUGHLIN: Yes, Advo-32.

13 COMMISSIONER LeBLANC: Thank you.

14 THE WITNESS: I found it.

15 BY MR. McLAUGHLIN:

16 Q Okay. Now, Advo filed this question on March
17 15th. We received the response on April 28th, which was 44
18 days after we asked it, 30 days beyond the date it was due.
19 We there asked, referring to some information you gave in
20 response to MPA-16, to explain a disparity between the
21 number of carrier routes that showed up and your response to
22 MPA-16 identifying observers, and the total number of routes
23 in your database in LR 193, do you recall that?

24 A Yes, I am reviewing the question.

25 Q Well, the question noted that your testimony

1 stated that there were 106 routes in Phase 1 of your study,
2 but your list of observers by route showed 148 routes, is
3 that correct?

4 A That's correct.

5 Q Now, in your response you acknowledge that the
6 difference represented routes that had been observed but
7 which were not included in the data you gave to Baron, is
8 that correct?

9 A That's correct.

10 Q Was that the first time that you advised the
11 parties and the Commission that there was this additional
12 data out there that had not been included in the data set
13 given to Baron?

14 A I can't recollect whether or not that was the
15 first time that I made this, it very possibly could have
16 been.

17 Q And that was on April 28th, just a short while
18 ago, is that correct?

19 A When this response was filed, yes.

20 Q Can you tell us why it took you so long to provide
21 this information indicating that there were records that had
22 not been included in a database given to Witness Baron?
23 Strike that question.

24 Now, I am somewhat curious by the third sentence
25 in your answer to Advo-32(a) where you say the Phase 1

1 observer and route listing in the response to MPA-16 was not
2 intended to identify unique routes. What did you mean by
3 that statement?

4 A I believe part of the confusion here is that in
5 my interpretation of MPA Question 16, it asked for the
6 observers which observed which routes.

7 Our database lists a number of routes, and so we
8 provided the response to that question, and then identified
9 which observers observed which routes.

10 Q But that statement was not somehow intended to
11 qualify the core of your answer, which was that, yes, there
12 were an additional 42 routes that had been observed, but
13 which were not included in the database given to Witness
14 Baron.

15 That sentence I just read does not somehow qualify
16 or explain that portion of the answer; does it?

17 A In Question MPA-16, I was listing the routes that
18 were included, what I thought was the appropriate response
19 for MPA-16, which was 106 routes.

20 Now, were there additional routes in the database?
21 Yes, there were additional routes in the database, 42
22 additional routes in the database.

23 Those 42 routes were not in the dataset for
24 Witness Baron.

25 Q And this was the first time that we were advised

1 of that?

2 A I'd have to do some checking on some dates to see
3 if this was the first time that you were advised of this.

4 And like I said earlier, there are other routes in
5 the entire engineering dataset that were not given to
6 Witness Baron. Some of those routes -- and since that
7 period of time, you become aware that also work sampling was
8 done inside the stations as well as just outside work
9 sampling.

10 Some of those routes could very well be routes
11 that were included in the engineering dataset for, say,
12 inside work sampling purposes and were not part of the
13 outside street activities that were required for Witness
14 Baron.

15 Q Now, you state in Advo-32(a), Subpart 3, that all
16 scanned data is provided in the zipped access file Advo-32
17 something or other, to be provided as a Library Reference.

18 Have we seen this Library Reference yet?

19 A I don't know whether you've seen that Library
20 Reference or not.

21 Q Has it been filed with the Rate Commission?

22 [Pause.]

23 And, if so, please give me a Library Reference
24 number.

25 [Pause.]

1 A I will have to check on that to see if that has
2 been filed at this point in time.

3 MR. McLAUGHLIN: Does Postal Service counsel know
4 whether it has filed a Library Reference that contains this
5 information?

6 MR. COOPER: No, I would have to check as well.

7 MR. McLAUGHLIN: You don't have handy with you, a
8 list of Library References that have been filed in
9 connection with Mr. Raymond's testimony?

10 MR. COOPER: I don't want to be argumentative with
11 counsel. There have been hundreds of Library References
12 filed.

13 MR. McLAUGHLIN: Well, I think this is one that's
14 --

15 CHAIRMAN GLEIMAN: If it will help, I have a list
16 of Library References that I'm willing to loan to Postal
17 Service counsel to peruse, but if not, since we're going to
18 be here tomorrow morning anyway, certainly we can get an
19 answer to that question by tomorrow morning, I would think.

20 MR. McLAUGHLIN: Well, it would have been one
21 filed since April 28th, because that's the date that we
22 first learned that this additional route data --

23 CHAIRMAN GLEIMAN: My list does not correlate
24 Library Reference numbers to dates of filing.

25 BY MR. McLAUGHLIN:

1 Q Now, that same part (a)(3) to Advo-32 then says
2 all hard copies have been made available for review under
3 protective conditions. What hard copies are you talking
4 about?

5 A It seems to me I remember seeing you out at the
6 Prosperity Facility at one of our informal technical
7 conferences where I reviewed various documents that
8 represented the hard copies of information that was
9 collected in the field.

10 There were a variety of things like 3999-Xs; there
11 were various reports that had been processed by the data
12 collectors that noted their comments on them as to what
13 records needed to be modified.

14 Q Okay, let me just follow up on that a little bit.
15 When was that technical conference held; do you recall?

16 It was held before this response was filed; is
17 that correct?

18 A I'd have to check; I don't know.

19 Q At the time of the technical conference, did we
20 have any reason to believe or any knowledge that there were
21 route days of observations that were maintained out at
22 Merrifield that were not in the database given to Witness
23 Raymond from Phases I and II?

24 I'm just kind of wondering how we should have
25 guessed that we should be looking for that?

1 A I believe there were other technical conferences
2 that were held prior to that, as well. In the engineering
3 dataset, this is an extremely large and complex project.

4 And I think I refer to that in my testimony; that
5 there is a lot of data that's available. Some of it -- I
6 say, the data that's directly obtainable to Witness Baron
7 and lots of other information that's part of that study.

8 Q So, you're saying, in essence, that we should have
9 just have known better and should have been looking for
10 things, even though we had no reason to believe that it
11 might have come from Phase I and Phase II observations that
12 were excluded from the Baron database; is that correct?

13 A [No response.]

14 Q I'll strike that question, too.

15 What form are those hard copies in? Here you're
16 referring to the Merrifield facility; is that correct? Is
17 that where these records are located?

18 A That's correct.

19 Q How many documents are we talking about, hard
20 copy?

21 A [No response.]

22 Q I'm not asking for a precise estimate, just a
23 rough figure within, let's say, a couple thousand, ten
24 thousand pages.

25 A The total amount of hard copies available at

1 Merrifield -- maybe I can give you something that will be
2 more realistic.

3 You have just recently asked for a number of
4 videotapes and videotape days, of which there are about 40
5 days worth of data to supply the vertical data stream that
6 you have asked for to support that. My estimate is that it
7 will take about ten thousand copies to get one set of data;
8 that is, the 3999Xs and the various reports that the data
9 collectors processed in the field, noting their comments.

10 Q Well, with respect to that particular request that
11 we made, I believe I indicated earlier that we had talked
12 with counsel about seeing if there was a way to simplify
13 that, so I don't want to get into that.

14 A My additional estimate for the total database is
15 that there are approximately over 900 videotapes and there
16 are approximately 1,500,000 pages that would have to be in a
17 final dataset that would be necessary to have all of the
18 copies, if the entire dataset was to be copied.

19 MR. McLAUGHLIN: Can I ask counsel for when we
20 will expect to receive this Library Reference, assuming that
21 it has not been filed?

22 MR. COOPER: I'll have to go back to my office and
23 see if I have the file. It could be that the witness gave
24 me the file and I haven't filed it yet. It should be within
25 a couple of days, I would think.

1 BY MR. McLAUGHLIN:

2 Q Now you talk also in ADVO-32, let me just back up.

3 Did it ever occur to you when you were writing
4 your testimony that perhaps you should have advised the
5 Commission and the parties that there was a broader set of
6 data and that you were providing it all but that only
7 portions of it were being used by Baron for the following
8 six reasons, as opposed to simply without telling us, giving
9 us a portion that we didn't know was less than the total?

10 A I'd appreciate it if you would state your question
11 once again.

12 Q Why did you not in your original testimony when it
13 was filed reveal the entire database and then explain why
14 Witness Raymond was being given only a portion of it, so
15 that all the parties would be able to look at the entire
16 dataset from the outset?

17 Why did you instead without telling us decide to
18 give us just a part of the complete dataset?

19 A The reason that I gave Mr. Baron and the USPS just
20 part of the dataset was that was what was requested of me to
21 supply.

22 Q That wasn't my question. My question was in your
23 testimony why did you not advise the Commission and the
24 parties that you had given the witness only a portion of the
25 total database and then presenting your reasons for doing

1 that so that the parties could then from the outset know
2 what the total database was?

3 Can you answer that question?

4 A My response is going to remain basically the same.
5 I was requested by the post office to supply to them
6 information that was pertinent to outside street activities
7 that was accomplished via work sampling process, and that is
8 what I focused my testimony on and that is the information
9 that I supplied them.

10 I saw at that time no reason for me to expand
11 beyond that scope to describe all of the pieces of
12 information that have been collected over a substantial
13 calendar period of time.

14 Q You list on ADVO Interrogatory-32, subpart (a)(2)
15 a couple of reasons why you say you excluded certain routes,
16 and one of them is you excluded routes less than 8 hours.
17 Do you see that?

18 Did you exclude all routes less than 8 hours?

19 A No. Those routes that we identified as auxiliary
20 routes.

21 Q Okay. Other routes that were less than 8 hours
22 you kept in the database?

23 A Yes.

24 Q Now as you can understand, Mr. Raymond, a number
25 of your responses to earlier interrogatories have since

1 created a great deal of confusion for us because we have
2 only now understood that some of your answers were referring
3 to information from the narrower dataset given to Baron and
4 some of your other answers were referring to data that
5 encompassed the broader dataset that went beyond what you
6 gave to Baron, is that correct?

7 A I would say that in order to respond to some of
8 the interrogatories that I have been requested I have had to
9 expand the area of providing information beyond the dataset
10 that was given to Mr. Baron.

11 Q And in those various interrogatories did you ever
12 indicate in your response that you were expanding it beyond
13 the LR-163 database? Isn't that something we just had to
14 figure out on our own later on?

15 Take, for example your response to MPA-16. Where
16 in MPA-16 do you state that you were providing information
17 that goes beyond the database given to Witness Baron?

18 You don't, do you?

19 A MPA-16?

20 Q Well, I hope I have the right number. I was doing
21 it off the top of my head without looking.

22 MR. COOPER: That was MPA-16.

23 MR. McLAUGHLIN: I hope I had guessed right.

24 THE WITNESS: In our response to Number 16, we
25 supplied all of the records that we had whether the routes

1 were or were not included in Mr. Baron's dataset.

2 BY MR. McLAUGHLIN:

3 Q Yes, and where in your response did you indicate
4 that that is what you were doing?

5 A I did not indicate that.

6 Q You did not indicate that?

7 A That this was supplied on Library Reference-163.

8 Q Please state that last statement again.

9 A I did not state, I do not believe and I can check
10 it here, that the data that we were supplying here, I did
11 not state that it did come from Library Reference 163. I
12 didn't state that it came -- just gave you the information
13 that we had available.

14 Q So we basically had to guess whether it
15 represented Library Reference 163 or something else. Is
16 there any way for someone just glancing at this to have any
17 clue that it didn't come just from Library Reference 163?

18 A No, there is no way for you just glancing at this
19 to state whether it did or did not come from Library
20 Reference 163.

21 Q And in fact since it was provided to us in hard
22 copy form the only way that we discovered that there were
23 some additional routes not in 163 was through going down,
24 line by line, with our fingers and suddenly spotting that
25 there were more routes than you had shown in 163, is that

1 correct?

2 Well, I guess you wouldn't know how we discovered
3 that, so I will drop that question too.

4 Likewise, could you please turn to your response
5 to ADVO-63.

6 A Yes.

7 Q Do you have that?

8 A Yes, I have Number 63.

9 Q This table that we presented there was an attempt
10 by us to try to match up the observed sites in Phase 1 and
11 Phase 2 against what we thought was in Library Reference
12 163.

13 You have had a long discussion here and I will get
14 back to this some more later on, but at the end of your
15 response to the 163 -- by the way, excuse me, it's
16 ADVO-63 -- ADVO-63 was filed on March 16th, before we had
17 any inkling that there were additional data or additional
18 routes that had been observed, and we received the answer on
19 April 27th, 28 days late.

20 MR. COOPER: Mr. Chairman, I believe that all
21 these filing dates are matters of record and can be easily
22 established. It is apparent that counsel is attempting to
23 argue here with the witness.

24 MR. McLAUGHLIN: Mr. Chairman, I can perhaps be
25 somewhat accused of that, and I will try to tone it down.

1 It does seem to me, Mr. Chairman, that the dates are in many
2 cases quite relevant, particular in terms of when certain
3 questions were asked, when other questions were answered
4 that may have been inconsistent with earlier question.

5 I will try to avoid embellishing. I would simply
6 note that in virtually all of the interrogatory responses I
7 will be referring to, except for the very early ones, we are
8 dealing with 28, 30, 35 day late answers.

9 CHAIRMAN GLEIMAN: Mr. Cooper, I appreciate your
10 concern and my impression when counsel started to ask that
11 question was that it was in connection with the fact that
12 certain additional information was uncovered in the
13 intervening period and I think we really have to provide an
14 opportunity for the record to be developed and fleshed out
15 in that regard, so we have Mr. McLaughlin and his word that
16 he word that he will attempt to tone down and not embellish
17 and if you would let him try and develop his case, thank
18 you.

19 BY MR. McLAUGHLIN:

20 Q We had thought that we were developing something
21 which in the question represented data in Library Reference
22 163. At the end of ADVO-63, you have a revised table, and
23 isn't it true that the revised table is not accurate with
24 respect to Library Reference 163? It is instead a
25 representation of the total data that were in the Phase 1

1 and Phase 2, including the information not included in
2 Library Reference 163?

3 [Pause.]

4 THE WITNESS: I believe you are correct that this
5 table represents what was in the total data set and not just
6 in 163.

7 BY MR. McLAUGHLIN:

8 Q So, in terms of what we thought we were asking
9 for, we still don't have a breakout with respect to what is
10 in 163. I will get back to that later, I just wanted to
11 clarify that that is the case. Could you now turn quickly
12 over to your response to MPA-18? By quickly, I am not
13 asking you to do it quickly, I have a quick question. I am
14 not trying to rush the witness.

15 MR. COOPER: That question again was number?

16 MR. McLAUGHLIN: MPA-18.

17 BY MR. McLAUGHLIN:

18 Q Mr. Raymond, we were having some confusion in
19 trying to read your testimony and some early responses
20 because you used two different terms, the term "site" and
21 the term "location." And we were confused as to whether
22 they meant the same or they meant something different. Do
23 you see your response in MPA-18?

24 A I haven't got there quite yet.

25 Q Okay.

1 A Yes, I now have 18.

2 Q Okay. When we asked you the question whether
3 there is a difference between the term "location" and the
4 term "site," as you were using it in your testimony, your
5 answer there is that site and location mean the same. Do
6 you see that?

7 A Yes.

8 Q Is that a correct answer?

9 A Site and location in my testimony, I believe that,
10 from my perspective, they mean the same thing.

11 Q Okay. Now, in an interrogatory that Advo asked
12 not long after that, but which we got the answer later,
13 Advo-63, part 1, can you look at that please? We had
14 pointed out what we thought were disparities in some various
15 numbers that you had, and you say that there is no
16 disparity. Then you go on to say, toward the end of that
17 part, quote, "A location could have more than one CY code or
18 site." Doesn't that mean that location and site mean
19 something different?

20 A I can say that in reviewing what I have written
21 here, in terms of sites and locations, that I can why it
22 would be a point of confusion. Maybe as an engineer I am
23 just not handling my grammatic statements as well as I
24 should have in preparing this testimony along these
25 particular lines. We have CY codes that represent a city

1 where observations are being made and we have route codes
2 that represent the specific routes.

3 In my testimony, in general, I was using the term
4 as if it meant interchangeable, location and the site were
5 the same to me in the use of my testimony.

6 Q Now, we are still on Advo-63. This time I would
7 like to refer you to part 5, the last part of Advo-63. The
8 first sentence says, "The total number of CY codes is 59."
9 By the way, CY code, can we use the term city code as well
10 as CY code there, is that close?

11 A I don't know, we might get confused doing that,
12 too. But let's give it a shot.

13 Q CY code is something akin to a city code. I may
14 not be --

15 A There could be multiple zip codes within a CY
16 code.

17 Q Right. Right.

18 A It typically designated a geographic city in which
19 we were conducting a study.

20 Q No, I don't want to be picky about the term CY, it
21 is just an acronym, it could be city, because it is
22 something comparable to a city. And you say the total
23 number of CY codes is 59, but that only 53 were provided to
24 Baron. Do you see that? Is 59 the correct number?

25 A I would have to double check. Let's assume that

1 we have 59 CY codes.

2 Q Okay. Now, you have identified in this same
3 answer six CY codes that you say you excluded. And I take
4 it that the 59 minus 6 gives you the 53, is that correct?

5 A Where did you see the 53? Are you looking at a
6 different page than I am?

7 Q No, the first part of your answer to part 5. You
8 say the total number of CY codes is 59. Of these, only 53
9 were provided to Witness Baron, that is a difference of six.
10 you have just below that identified six CY codes. Is that
11 what you believe to be the difference, those six CY codes
12 are the six difference between 59 and 53?

13 A Yes.

14 Q Were there any other omitted CY codes? Well,
15 here, let me just posit this to you, was CY 31 an additional
16 city code that was included in your study that was not
17 included in the information given to Witness Baron?

18 A I would have to look to try to identify what CY
19 code 31 represents.

20 Q While you are looking, can you also check for CY
21 code 65, which also, as far as we can determine, does not
22 appear in the Library Reference 163 given to Witness Baron?

23 Now, we are basing -- I am basing these questions
24 on your responses to Advo Interrogatories 7 and 9, compared
25 with the Library Reference 163 database.

1 MR. McLAUGHLIN: Now, Mr. Chairman, we have been
2 having great difficulty trying to track all sorts of things
3 in this witness' testimony, and I suppose it is always
4 possible that our analyses based on some of these other
5 answers is incorrect, but that is part of the problem we are
6 facing here, is that we have kind of a moving target. When
7 are we going to find out as to whether those additional two
8 CY codes were included in the broader data collection but
9 not included in Library Reference 163? Can we find that out
10 rather quickly, or is this a complex process?

11 CHAIRMAN GLEIMAN: Mr. Raymond, is that something
12 that we can find out in a reasonable amount of time?

13 MR. COOPER: It would be my hope, Mr. Chairman,
14 that if we do resume tomorrow, that perhaps we could get
15 that answer by tomorrow.

16 CHAIRMAN GLEIMAN: That would be great.

17 MR. McLAUGHLIN: Well, let's just go to Advo-7,
18 because I want to have a very specific reference here to
19 this.

20 BY MR. McLAUGHLIN:

21 Q In your response to Advo-7, actually, we asked you
22 to identify the 32 locations in Phase 1, not realizing that
23 there was a difference between locations and sites. In your
24 response, you gave us 40 CY codes in Phase 1. And over on
25 page 2, one of those CY codes is CY 31, that does not exist

1 in the LR 163 database.

2 If you turn to Advo Interrogatory Number 9, which
3 dealt with Phase 2 of your study, you will see that the next
4 to last city code listed there is CY 65, which also does not
5 appear in the Library Reference 163 database.

6 MR. COOPER: That was Advo-9?

7 MR. McLAUGHLIN: Advo-7 and Advo-9. Excuse me.
8 When were we expected to get an answer to that?

9 CHAIRMAN GLEIMAN: Mr. Cooper said that since we
10 were going to break early, that he was going to work through
11 dinner hour with the witness and, hopefully, provide the
12 responses tomorrow.

13 MR. McLAUGHLIN: Okay.

14 CHAIRMAN GLEIMAN: Or tell us when we could expect
15 a response.

16 BY MR. McLAUGHLIN:

17 Q Now, at the table down at the bottom of Advo-63
18 that I said I would be getting back to, I understand now
19 that this table represents the entire database and not just
20 LR 163, but I want to check two numbers in the total column
21 to see if, in fact, they are correct. For Total Observed
22 Sites, well, let's just go down to the USPS selected
23 observed sites. Do you see the number 42 in the total
24 column?

25 A Yes.

1 Q Shouldn't that really be 50?

2 A It appears that it should be 50.

3 Q And so then for Total Observed Sites, the far
4 upper right figure, 59 should be 61, is that correct?

5 A I will have to double check this because then we
6 have like the random observed sites, 11, plus the 50, should
7 give us 61.

8 Q Okay. And, in fact, if you are reading across the
9 top on Total Observed Sites, there were 40 sites observed in
10 Phase 1, 21 brand new sites observed in Phase 2, that is 61,
11 isn't it?

12 A Correct.

13 Q And then there were two sites that were observed
14 in both Phase 1 and 2 that are already counted in the first
15 40, is that correct? Does that math make sense?

16 A That math makes sense.

17 Q Now, will you accept, subject to check, that in
18 the LR 163 database, there are 53 CY codes?

19 A We will be performing that check to see what the
20 ones are.

21 Q Okay. So if there are 53, that would mean a
22 difference of eight CY codes that are missing in LR 163?

23 A And they made be identified as number 31 and
24 number 65 after we finish checking.

25 Q Now, then, in addition to omitted sites, entire

1 sites that were not -- that were observed but not included
2 in the database, were there routes on other sites that were
3 included in the database that were -- excuse me. I'm
4 scrambling myself here.

5 Aside from these either six or eight sites that
6 were not included in the database, were there routes from
7 other sites that were included in the database that were not
8 included in their entirety?

9 A [No response.]

10 Q I'm still confused by own question. Let me try
11 this again.

12 There were routes -- let me just give you an
13 example.

14 You referred, I believe, somewhere to the fact
15 that there were two CY codes that were observed in both
16 Phases I and II, and those two CY codes were CY02 and CY04;
17 is that correct?

18 A I'd have to double-check that. Those could be
19 correct; those sound like the correct ones, CY02 and CY04.

20 Q So they were both observed in both Phases?

21 A Correct.

22 Q Do you know whether the observations in Phase I
23 for CY04 are included in the Raymond database? We weren't
24 able to find them.

25 A That was which CY again?

1 Q CY04.

2 A CY04.

3 Q Phase I.

4 A Phase I.

5 Q I might add that the reason that we know now that
6 this was observed in Phase I is because we found it in your
7 response to Advo 63 after painstakingly looking through
8 lines and lines of data, but we could not find it in Library
9 Reference 163.

10 [Pause.]

11 A We'll put that on the to-do list as well.

12 Q Were there any other routes -- let me stop and
13 rephrase again.

14 There were a number of routes that were surveyed
15 on multiple days; is that correct?

16 A That's correct.

17 Q Okay. So you may have six, eight, ten days of
18 observations for a single route; is that correct?

19 A That's correct.

20 Q Were there any route days for which some -- excuse
21 me.

22 Were there any routes for which some route days
23 were included in LR-163 and other route days were not?

24 A Let me rephrase the question. For routes on which
25 we conducted multiple-day studies, were there any of those

1 route days associated with that route not included in
2 Library Reference 163?

3 Q Well, more specifically, were there any instances
4 where for a particular route, some days of observations were
5 included, and some days were not included?

6 A I would have to double-check that. The typical
7 reason that a route day would not have been included in the
8 database, is if we had had an equipment failure and not
9 being able to collect the route, or if only a partial day's
10 worth of data had not made it, so that we would not have had
11 outside street time associated with that.

12 Records, on a couple of occasions, also did not
13 make it all the way through the process, so we did not have
14 supporting backup information.

15 But we will double-check to see if there were any
16 days' worth of multiple-day studies on a route that did not
17 make into 163.

18 [Pause.]

19 Q I'd like to refer you now to Advo-61. This
20 response contains volume information by route day; is that
21 correct?

22 A That's correct.

23 Q Okay. Now, I won't get into when this was
24 provided, but I will note that this was provided in hard
25 copy form; is that correct?

1 A That's --

2 Q There's no electronic version of this?

3 A If my recollection is right, it appears that you
4 have requested an electronic version and we're in the
5 process of supplying that.

6 Q Okay. Can you understand why an electronic
7 version would be helpful for a document like this?

8 [Pause.]

9 I'll strike that question. Never mind, never
10 mind.

11 MR. COOPER: I'm going to point out, Mr. Chairman,
12 that this question doesn't ask for the data in electronic
13 version, and some of the questions from Advo did. And
14 counsel is perfectly capable of doing that when he has not
15 forgotten to do that, and asked me for the electronic
16 version and I have made every effort to get it to him.

17 CHAIRMAN GLEIMAN: And apparently from the answer
18 I just heard from the witness, an electronic version of this
19 particular data is on its way, too, so --

20 BY MR. McLAUGHLIN:

21 Q Now, you state at the front of your answer to
22 Advo-61 that attaches -- that has the attachment of all of
23 these volume figures, that the information requested in
24 these questions does not relate to the work sampling tallies
25 provided to Witness Baron.

1 What do you mean by they do not relate to the work
2 sampling tallies? Isn't this volume information that was
3 collected on the days that routes were sampled?

4 A Yes, but I could not break this down to a tally
5 level. I have to give this at an overall route level.

6 Q Right. These are the volumes of mail that were
7 delivered on the days the routes were surveyed?

8 A Correct.

9 Q And in that sense, they do relate to the work
10 sampling tallies in that sense?

11 A In that sense.

12 Q Okay. Now, we went through manually and counted
13 up 105 random site route days and 876 USPS-selected site
14 route days for a total of 981 route days. Does that ring a
15 bell?

16 A I would have to double check, but that is a
17 possibility.

18 Q So the 981 includes route days beyond the 844 that
19 were provided to Baron, is that correct?

20 A Correct. If there are 981 in there, correct.

21 Q Does this include all of the route days that were
22 given to Witness Baron, or are there some missing route
23 days?

24 A I believe that there will be some route days that
25 are given in here that will not necessarily have volume that

1 is associated with the route days that were necessarily
2 studied for Witness Baron. I would have to double check
3 that, but it is a possibility that of the 844 route days
4 that were given to Witness Baron, that we did not get the
5 volume information that was requested. We supplied all the
6 information that we had available.

7 Q Okay. Now you had --

8 A And I might add that we did have to go through
9 records manually to extract all this information.

10 Q Now, you did, in a previous response that we just
11 discussed, Advo-63, you listed six CY codes that had been
12 omitted from the Baron database, and we checked those six CY
13 codes out on Exhibit -- on your response to Advo-91 and
14 found that they show 14 route days.

15 MR. COOPER: Did you mean to say Advo-61?

16 MR. McLAUGHLIN: I meant to say Advo-61, yes.
17 What did I say? I am losing track.

18 BY MR. McLAUGHLIN:

19 Q And if you want, I have identified the spots, the
20 lines in Advo-61 that have those six CY codes that you
21 referred to, and they appear a grand total of 14 route days.
22 Does that surprise you at all?

23 A No.

24 Q Those routes, those particular six routes were not
25 surveyed very often, were they? That was part of your

1 mostly Phase 1, is that correct?

2 A I would have to double check on that.

3 Q Okay. So, compared to the at least 981 route days
4 that you have got here, compared to the 844 in Mr. Raymond
5 -- or in Mr. Baron's data, these six CY codes you have
6 identified only account for a very small portion of that
7 difference, the missing difference, don't they?

8 A It appears that way, yes.

9 Q Now, just for clarification, this is really just
10 minor, I just simply want to have the record reflect it,
11 Advo-61, your response has really -- well, actually, I
12 guess, technically, four parts to it, but in terms of the
13 data it is two parts. There is first an 18 page part at the
14 front and then a three page part at the back, is that
15 correct? The 18 page part represents Postal Service
16 selected sites and the three pages at the back represent
17 random selected sites.

18 A The random selected sites.

19 Q Okay. And, again, just so the record is clear on
20 what we are dealing with here, if you would turn to page 18
21 of that first part, there is a line down at the bottom of
22 that page that says Advo/USPS-61(d), do you see that? Are
23 you with me?

24 A Yes.

25 Q Okay. Do you see that line?

1 A Yes.

2 Q Okay.

3 A My copy is not very legible.

4 Q Yeah. I believe that the (d) should be a (b)
5 because part (b) of the question asked for the average
6 volumes on management selected routes. In fact, if you
7 would turn over to the third page, the very last page of
8 this question, the third page of the random one, you will
9 see it also says Advo-61(d). The Advo-61(d) there is
10 correct, but the Advo-61(d) should be (b) on page 18, is
11 that correct? This is not a trick question. I am just
12 trying to -- I am virtually certain that is the case.

13 A Yes, I believe in (b) you wanted the averages for
14 what was supplied from the Post Office and then the other
15 set of averages, which would have been (d).

16 Q That's correct. That's correct. So that should
17 be 61(b). Now, first of all, what is the source for all of
18 this volume information, is it taken off of -- is this based
19 on the counts that were done the days of the surveys?

20 A Yes, these were based upon the counts on the days
21 of the survey.

22 Q Okay. So, on page 18 of that first part to
23 Advo-61, the line there at the bottom, that line represents
24 the averages per route day for the different volume
25 categories?

1 A Yes, that would represent for all of the records
2 preceding what those arithmetic averages were, right.

3 Q Now it's -- I'm not blaming you at all for this,
4 but it's a little difficult to follow because the only pages
5 that have the headers are the very first page, so it is kind
6 of hard to know what these lines down at the very bottom
7 represent.

8 Let's just take, for example, the first number
9 there on page 18, 483.4. That represents average number of
10 delivery points, does it not?

11 A Correct.

12 Q Okay. The next number, 553.3, represents the
13 average volume of letters?

14 A Correct.

15 Q 759.0 represents the average volume of flats?

16 A Correct.

17 Q 1,038.5 represents the average DPS volume?

18 A Correct.

19 Q Okay --

20 A I'm sorry. I am having a hard time reading my
21 copy, but --

22 Q Right, and then the -- over at the very far
23 right-hand side the figure 2,453, that represents total mail
24 volume per route day?

25 A I believe that is correct.

1 Q Okay, and the final figure is average volume per
2 possible delivery?

3 A Right.

4 Q Is this a -- how did you calculate these figures?
5 Was this a spreadsheet where you simply said sum, row 1
6 through 300?

7 A Right.

8 Q So it is like an Excel spreadsheet?

9 A Right.

10 MR. McLAUGHLIN: Mr. Chairman, this is obviously
11 extremely useful information or may be extremely useful, I
12 don't know yet since we haven't had a chance to really
13 analyze it and use it. In the past, the Postal Service when
14 it has filed a Library Reference or information in
15 electronic form has sent me or sent the Postal Service an
16 electronic version which can then be quickly downloaded for
17 easy use.

18 It seems to me if this isn't a spreadsheet
19 already, this information was provided in hard copy to us
20 not too long ago but long enough ago that it would have been
21 useful to have in electronic form, so I would like to get
22 that -- it seems that that could be done very quickly.

23 CHAIRMAN GLEIMAN: Mr. Raymond, is something
24 available in electronic form that could be provided?

25 THE WITNESS: It could be provided fairly quickly.

1 MR. McLAUGHLIN: Because, Mr. Chairman, we can't
2 tell how these numbers were calculated or how they mix or
3 match.

4 CHAIRMAN GLEIMAN: I understand and there are
5 those of us even when we have the electronic version, we
6 can't figure it out.

7 BY MR. McLAUGHLIN:

8 Q And likewise the figures over at the very tail-end
9 of ADVO-61, the page number 3 --

10 A The same thing for the random?

11 Q It's the same kinds of deliveries and volumes
12 figures for the randomly selected routes, is that correct?

13 A Correct.

14 MR. McLAUGHLIN: Mr. Chairman, it seems to me that
15 we also need to get fairly quickly -- we need to get a lot
16 of things fairly quickly, and it may be that some of them
17 were too late -- we need to get a list that really shows
18 which CY codes and which routes and which route days are
19 included and not included in Mr. Baron's Library Reference
20 163. Actually I guess it is your Library Reference but used
21 by Mr. Baron.

22 We have been discussing that here for some time
23 and we need to get that information.

24 CHAIRMAN GLEIMAN: I was under the impression that
25 you had requested a lot, if not all of that data already

1 during the course of making reference to specific city
2 codes, but --

3 MR. McLAUGHLIN: I am not entirely sure, because,
4 Mr. Chairman, we ourselves -- we had discovered some things.
5 I don't know if we have discovered everything and I don't
6 want to somehow or other have limited what I asked for so I
7 end up not have asked the question precisely enough to get
8 what we need.

9 CHAIRMAN GLEIMAN: I understand. Mr. Cooper, in
10 the interest of progress, mom, apple pie and the American
11 way, do you think that we can get that information, an
12 indication of what data that Mr. Raymond collected found its
13 way into 163 and what data was used by Witness Baron? Is
14 that --

15 MR. COOPER: Well, whatever is in 163 was used by
16 Witness Baron. The question is what is not in 163 that was
17 not given to Witness Baron. That is what we are really
18 trying to get at.

19 There were over the course of your questioning a
20 number of references to particular CY codes that --

21 MR. McLAUGHLIN: Right.

22 MR. COOPER: -- that don't appear but in addition
23 there are others beyond that too.

24 CHAIRMAN GLEIMAN: Let's just try and
25 short-circuit the discussion here. To the extent that

1 someone that the Postal Service can do a crosswalk between
2 the data that was collected during the course of the surveys
3 that Witness Raymond undertook and/or others undertook on
4 his behalf and that did not find its way into Witness
5 Baron's Library Reference, and was not used by Witness
6 Baron, could we please have some type of a listing that
7 showed the city routes, the city codes, the route numbers,
8 and all the other information that is included in Library
9 Reference 163 that was utilized.

10 MR. COOPER: If that is what counsel is asking
11 for --

12 CHAIRMAN GLEIMAN: I think that is what he wants.
13 He wants the -- it is not a mirror image and it is not the
14 flip side, it is comparable information to 163 that is
15 available that wasn't in 163.

16 MR. COOPER: We will endeavor to do that. You are
17 perhaps more eloquent than I am in expressing it.

18 CHAIRMAN GLEIMAN: It took me about three shots,
19 too, and I am not sure I understand what I just asked them
20 to provide.

21 If it wouldn't be too disruptive, I think that the
22 witness has been up there for awhile. This would be a good
23 going in time to take a 10-minute break.

24 MR. McLAUGHLIN: Mr. Chairman, I might just
25 inquire how much further you plan on pressing?

1 Obviously I don't think that we are going to be
2 able to finish today. I don't particularly have any reason
3 to want to wear ourselves all down here, but I am willing
4 just to play it by ear.

5 CHAIRMAN GLEIMAN: How much longer do you think
6 you have to go on the unprotected materials?

7 MR. McLAUGHLIN: Well, the big question mark, Mr.
8 Chairman, is the extent to which we want to try to get into
9 going after a lot of the interrogatories are outstanding
10 through oral cross examination. I frankly think that is
11 going to be an enormous amount of time to try to do that and
12 perhaps counterproductive, so --

13 CHAIRMAN GLEIMAN: My intention is to, as I
14 indicated earlier on, to go to somewhere in the vicinity of
15 6 o'clock and see where we are at that point, whether you
16 have exhausted yourself or the witness at that point, or
17 whether someone else has an opportunity to begin their cross
18 examination, and we will just have to play it by ear but
19 let's take 10 now.

20 Let me just point out that the question arose
21 earlier about the Library Reference that was referred to in
22 I believe T13-32(a)(iii). The question was whether it was
23 ever filed. You gave me a date of 4-18 or subsequent
24 thereto. Just so Postal Service counsel knows. It is not
25 100 percent clear to me but I am looking at the dates on

1 which Library References were filed and the Library
2 Reference that were filed from that point on, there does not
3 appear to be a match between that particular interrogatory
4 response, and during the course of it all we discovered that
5 there is another reference in another interrogatory to
6 Library Reference I-238, which does not appear to have been
7 filed, although it has a number associated with it.

8 MR. McLAUGHLIN: Is that the one that Mr. Baron
9 referred to? Is that ADVO Interrogatory --

10 CHAIRMAN GLEIMAN: I'm sorry that I can't -- 238
11 is routes that receive DPS volume, and to the best of our
12 ability to determine on a quick look we believe that that
13 may not have been filed.

14 I don't recall the interrogatory that made
15 reference to that number.

16 So with that, why don't we come back at five of
17 the hour. We will go until 6:00, give or take a little bit,
18 depending on where things are with cross examination and
19 figure out where to go from there.

20 [Recess.]

21 CHAIRMAN GLEIMAN: Mr. McLaughlin, it looks like
22 Mr. Raymond and counsel are ready, so whenever you're ready,
23 you may continue.

24 MR. McLAUGHLIN: Okay.

25 BY MR. McLAUGHLIN:

1 Q Mr. Raymond, I'd like to refer you to your
2 response to MPA-56, which was a compelled response to an
3 earlier MPA interrogatory.

4 And we just received this in hard copy form. Here
5 again, this response is a fairly lengthy one.

6 Is it possible to get this response in electronic
7 form?

8 A Yes, it is.

9 MR. COOPER: What number was that?

10 MR. McLAUGHLIN: This is response to MPA
11 Interrogatory Number 56.

12 BY MR. McLAUGHLIN:

13 Q While we are here, I just want to try to
14 understand this a little bit. Just take a look at page 1.

15 Obviously, since this is hard copy, we haven't
16 been able to do very much with it.

17 But if you notice the very first entry there for a
18 route that was observed on October 15th, 1996, it shows that
19 a total of 122 tallies were taken throughout the day, and
20 that the entire time covered by those tallies was ten hours
21 and 34 minutes; do you see that?

22 A Correct.

23 Q Now, if tallies were taken every six minutes, how
24 do you get 122 tallies in ten hours and 34 minutes?

25 Doesn't that really represent about 12 hours and

1 12 minutes of tallies?

2 [Pause.]

3 There appears to be some confusion here. Let me
4 back up a little bit.

5 Tallies were supposed to be taken every six
6 minutes; is that correct? Ten tallies per hour?

7 A Correct.

8 Q And that was based on a beeper going off. Every
9 time the beeper went off, the data collector was supposed to
10 make a tally?

11 A Correct.

12 Q So in an hour's time, there would be ten tallies?

13 A Correct.

14 Q In ten hours time there would be 100 tallies? In
15 ten hours and 34 minutes, there would be presumably 105
16 tallies; is that correct?

17 A Correct.

18 Q How do you get 122 tallies then, if the beeper was
19 going off every six minutes?

20 A I would want to go back and look at the entire
21 day's set worth of tallies before I gave you the definition
22 of what was there.

23 Q Well, conversely, again, just really
24 spot-checking, we found some where the tallies appear to
25 amount up to substantially less than the number of hours

1 shown. Are there any explanations for that?

2 A I'd have to go back and look at the individual
3 days.

4 Q Finally, I just noticed just in general, as you
5 flip through the last -- these pages which show the last
6 column here, that there appear to be an awful lot of days
7 here that have 10, 11, 12 hours of data recording going on;
8 do you see those as well?

9 A Correct.

10 Q Is that indicative of overtime?

11 A It could be overtime.

12 Q What else could it be?

13 A It could be that there were other assistants that
14 had been given on that particular route on that particular
15 day that would not necessarily have been an overtime
16 situation.

17 In other words, the route may have been a greater
18 than an eight-hour day, or with auxiliary assistance,
19 somebody else would have picked up and carried the route.
20 So I couldn't tell you whether or not that particular
21 carrier was carrying the route for the additional time that
22 was on the route. It might have been some other carrier.

23 Q Well, wait a minute. Maybe I just didn't
24 understand.

25 Were you following a route or were you following a

1 carrier?

2 A I was following a route.

3 Q So if halfway through the route, the first carrier
4 gave up and went back home and somebody else came out and
5 replaced him, you would then follow the second carrier?

6 A We would attempt to pick up the second carrier,
7 correct.

8 Q I would like to refer you now to your response to
9 Advo-45. And do you have that?

10 A I am getting close.

11 Q Okay.

12 A Yes, I have number 45.

13 Q Okay. There in part (b) you indicate that five
14 route days of data from these specific routes were from
15 implementation test sites. Are these routes included in
16 Library Reference 163?

17 A I would have to double check that.

18 Q Okay. Do you know if there were any other routes
19 from implementation sites?

20 A No, I believe these, that CY 04 is the only site
21 that we studied days of this nature.

22 Q Okay. So, CY 04 was the only implementation site?

23 A No, it was not the only implementation site, it
24 was the only implementation site that we studied and
25 collected data in this manner.

1 Q It was the only one that you collected data in
2 this manner?

3 A After we had -- let me see if I can get this
4 straight so that we don't get too confused on this. After
5 we had completed the development of the Engineered
6 Standards, then the Engineered Standards and its associated
7 work management system were instituted in various sites.
8 One of those sites was CY 04. After we had implemented it
9 at those sites -- at that particular site, we went back out
10 using the same bar code strategy, the same data collecting
11 hierarchies and we went out there and we studied routes in
12 CY 04. And these are the particular dates and route numbers
13 that we collected that information on.

14 We did not get to the other implementation sites
15 after we had implemented the program to attempt to conduct
16 the same style of studies.

17 Q Is that because those occurred after April of 1998
18 or is it for some other reason?

19 A It would be for some other reason.

20 Q Now, we noticed that if you look at Advo-61, which
21 we discussed earlier, --

22 A Advo-61.

23 Q -- particularly if you look at pages 17 and 18,
24 after December 9th, 1997 is where these route days that you
25 refer to occur, is that correct?

1 A Tom, I am having a real hard time trying to read
2 my copy to pick up the specific dates. What page number was
3 that on again?

4 Q It is on page 17 of Advo-61.

5 A And you are about two-thirds of the way down the
6 page?

7 Q Slightly more than two-thirds.

8 A At CY 04.

9 Q Right. And, in fact, --

10 A The dates on those various days there?

11 Q And, in fact, it was the -- the first date in
12 December is 12/9 and the very next date, 12/12/97 is route
13 4920, which is, I think, the route you referred to in your
14 answer to Advo-45, one of the routes.

15 A 4920 on 12/12/97?

16 Q Right.

17 A Okay. I think I have picked that one out here.

18 Q Okay.

19 A It is about the fifteenth or twentieth --
20 fifteenth record up from the bottom, I think, something like
21 that.

22 Q Yeah, that is about right.

23 A Okay.

24 Q Weren't there other days that that very same route
25 was also surveyed in December and January and February of

1 '97 and '98 that are not included in Library Reference 163?

2 A I will have to check.

3 Q Can you also check for all of those routes you
4 identified, route 4908, route 4917, route 4920? Actually,
5 you don't need to check for route 4940 because we only found
6 two tallies and both of which we found in the Raymond -- in
7 the Baron database.

8 MR. COOPER: Counsel, could I ask you to restate,
9 for my benefit, what you are asking us to check on here?

10 MR. McLAUGHLIN: The witness, in his response to
11 Advo-45, listed specific route day observations for these
12 routes that were included in Library Reference 163. When
13 you look through Advo-61 at around that same period, you
14 find other route days that these same routes were observed
15 that do not show up in Library Reference 163.

16 Let me give you an example. Route 4920, which is
17 the one we just discussed a few moments ago, also appears in
18 Advo-61 on January 24th, 1998, January 26, 1998, and January
19 31st, 1998. But yet those three days do not appear in
20 Library Reference 163.

21 BY MR. McLAUGHLIN:

22 Q Can you tell us why they were excluded and the
23 other one was included?

24 A I believe that is what you have asked for me to do
25 earlier.

1 Q Okay.

2 A Or just a little while ago, where the Chairman
3 took and tried to summarize what you are stating, that is,
4 to go through all the various routes and identify the
5 rationalization for what is in the 844 and outside of the
6 844 scope.

7 Q Okay. Were there other -- let me just ask you.
8 On the dates, if we look at Advo-61, starting with December
9 9th, 1997 on page 17, and going through to the end, every
10 single observation, and there are a fair number of them, are
11 all for CY 04 for what appear to be two different zip codes,
12 zip code 49 and 42. Were all of those test implementation
13 sites or just some of them? We would like to find out.

14 A I think, like I say, Tom, when we go through and
15 look at what is inside and outside, we should be able to
16 come up with a rationalization for you.

17 Q Right. And you could, for example, -- you can
18 check, for example, from the -- one way of possibly checking
19 it would be to see if there was a change in delivery points
20 between those two periods, between periods prior to December
21 and periods after December.

22 A Right.

23 MR. McLAUGHLIN: Okay. I hope somebody is keeping
24 good track on this list because I have not been keeping a
25 list myself here.

1 MR. COOPER: I am trying very hard to keep track
2 of this.

3 MR. McLAUGHLIN: My problem is I am asking
4 questions and I am not recording things here.

5 CHAIRMAN GLEIMAN: I think that was an admission
6 against interest just now. I know that Mr. Cooper and Mr.
7 Raymond are both trying to keep score, and I am sure that
8 they will make an honest and forthright effort to respond to
9 each and every request.

10 MR. McLAUGHLIN: Mr. Chairman, --

11 CHAIRMAN GLEIMAN: There is also a transcript
12 being made.

13 MR. McLAUGHLIN: It is not to suggest that I don't
14 have any sympathy, but I think that you can understand
15 perhaps that it creates many problems for us as well.

16 BY MR. McLAUGHLIN:

17 Q I do have some other questions in this general
18 area, but I think I'll save those for our private conference
19 later on tomorrow, probably.

20 Was CY-66 a test implementation site?

21 A I couldn't tell you, offhand.

22 Q The only reason I ask is that CY04 and CY-66 are
23 the only two routes that appear to have been surveyed after
24 December of '97, so --

25 A CY-66.

1 [Pause.]

2 MR. McLAUGHLIN: Mr. Chairman, I had some
3 questions along that line, but I think until I get an answer
4 to the first question, it doesn't make sense to pursue
5 those.

6 [Pause.]

7 BY MR. McLAUGHLIN:

8 Q Can you refer to -- just one second to make sure
9 I've got them.

10 [Pause.]

11 Can you refer to your response to Advo
12 Interrogatory 60? And this related to a statement in the
13 message that went out to the Postal Regions when sites were
14 selected, that indicated that the Postal Service wanted to
15 select -- the Regions to select cities that had high DPS
16 volumes; do you recall that?

17 A Yes.

18 Q And you state there that because of the selection
19 of random sites, this statement became moot.

20 Do you see that statement?

21 A Yes. I think I might want to take that one step
22 further. I'd have to double-check, but just looking at the
23 U.S. Postal-selected sites, I don't necessarily feel that
24 their DPS volume was high DPS volume.

25 They were U.S. Postal-selected sites of which DPS

1 volume was cased, and I believe that there was some UPS
2 sites that were selected that also there was no DPS volume.

3 Q Can you take a look at Advo-61?

4 A Yes.

5 Q Let me see here and let me get the right reference
6 here. Go to page -- toward the very end of Advo-61, the
7 random days.

8 [Pause.]

9 Do you see that?

10 A Yes.

11 Q Now, we had discussed earlier, how at the very,
12 very tail end of 61 you calculated average volumes for the
13 random site, and, for example, you show a DPS volume of
14 926.6 pieces per route day; do you see that?

15 A And these totals selected route days that are in
16 here, yes.

17 Q Okay. Now, that's just the average of all of the
18 route days shown above that; is that correct?

19 A Yes.

20 Q Okay. Do you notice that a great majority of the
21 route days are in just two CY codes, 54 and 66, the only CY
22 codes sampled in Phase II?

23 [Pause.]

24 A Yes, we did. It appears that we did a large
25 number of multiple-day studies that were studies in CY Code

1 66.

2 Q Okay, so to the extent that there is a difference
3 between the two CY codes in Phase II and the other CY codes
4 in Phase I in terms of DPS, the Phase II would tend to skew
5 the average DPS volume you show there?

6 A In looking at these records, these records do
7 include the 844 route days that are in Baron's database.
8 But if you look at the DPS records that are associated with
9 the 844 route days there, you may see a different set of
10 numbers or get a different impression as to what the DPS
11 value was for each one of the route days that were in the
12 study.

13 In other words, this dataset here contains more
14 route days, as we have already discussed, and therefore the
15 averages here may not be indicative of the same averages
16 that are in the 844 route days.

17 Q In other words you are saying this has 981 routes
18 compared to the 844 that are in Mr. Baron's database?

19 A I want to make sure we keep, try to keep, we want
20 to keep route days and routes, okay? This database here we
21 are looking at every day that we collected data on every
22 single route that we had this sort of information on to put
23 into this particular response, so I don't want to draw the
24 conclusion that there were that many routes. It's as many
25 route days' worth of information that we had.

1 Q Okay, but if you were going to -- the point is
2 here that when you look at the 926 DPS per day that you show
3 here on this exhibit for randomly selected routes, it is
4 pretty clear, isn't it, that if you look at the routes in
5 Phase 2 prior -- excuse me, if you look at the routes in
6 Phase 1 it appears, just looking casually at them, that they
7 tend to have less DPS volume than the much greater number of
8 observations in Phase 2.

9 A I would prefer not to use this sort of analysis to
10 try to draw that conclusion from. I would prefer to use the
11 Library Reference that we filed in response to ADVO-23(b) I
12 believe it is where I have in there the comparison of the
13 days that are associated in DPS volume, letter volume and
14 other criteria that are on the routes.

15 Q And why is that?

16 A As I say, this has a number of route days that are
17 in this dataset and if I look at what was in the so-called
18 part of this, and I believe this is what the post office
19 elected, is the 18 pages and then the random sites of the
20 last three pages and that is what we are trying to draw the
21 conclusions from, that there was differences in the average
22 amount of DPS. Is that what we are trying to do?

23 Q Yes.

24 A Yes, those arithmetic averages are different
25 between these two documents, these two datasets.

1 Q Let's in fact turn now to what you just mentioned.
2 This is your response to ADVO Interrogatory 23.
3 Specifically I think you are referring to a spreadsheet that
4 was in that response, an electronic spreadsheet?

5 A Correct.

6 Q And the electronic spreadsheet is captioned
7 ADVO-23, LR-1-TBL.xls?

8 A That was ADVO 23, BLR-1 TBLS -- is that one you
9 are referring to? Is that the right one? Did we get the
10 right one?

11 Q Well, mine was TBL.xls.

12 A Okay, yes.

13 [Pause.]

14 MR. McLAUGHLIN: Mr. Chairman, I have a cross
15 examination exhibit which consists of the upper portion of
16 that. It's a rather lengthy spreadsheet and I am going to
17 be focusing at least for the moment on that upper portion of
18 the spreadsheet.

19 Just for reference, this is Postal Service Library
20 Reference 293. It is a spreadsheet called
21 ADVO-23-LR-TBL.xls and the worksheet on that page is called
22 "Random to MGT Picked."

23 MR. McLAUGHLIN: All I did was this put in a
24 column header here -- A, B, C, C --

25 THE WITNESS: To make it easier to talk about it.

1 MR. McLAUGHLIN: It corresponds to the cells --

2 [Pause.]

3 MR. McLAUGHLIN: Mr. Chairman, I am handing two
4 copies of the document identified as Advo-XE-T-13-1.

5 [Cross-Examination Exhibit No.
6 Advo-XE-T-13-1 was marked for
7 identification.]

8 BY MR. McLAUGHLIN:

9 Q Do you see that document?

10 A Yes.

11 Q Now, I believe that the only thing that I have
12 done is, on the third line down, I have inserted a row of
13 letters to represent the cell sheet rows that were in the
14 spreadsheet. Do you see that?

15 A Yes. The column identifiers A, B, C, D, E, F, G.
16 Yes.

17 Q And the reason it goes G, H, I, K is because
18 Column J was a hidden column in the spreadsheet. First of
19 all, in the number of sites near the column, All Routes
20 Combined, you show a total number of 59, do you see that?

21 A Yes.

22 Q That is one that we discussed earlier today where
23 we thought there were actually 61, is that correct?

24 A Correct.

25 Q And that there were, under Column E, Number of

1 Sites for Management Selected, 50 instead of 48?

2 A Correct.

3 Q And that is the one that you are not sure about,
4 you are going to check on, right?

5 A We are going to check on, right.

6 Q Okay. Now, I would next like to just find out and
7 ascertain the source of these numbers here. Under number of
8 route days, you show 105 route days for the random. Is
9 that, in fact, what is included in the Raymond -- the Baron
10 database?

11 A I am getting to the point where I am getting a
12 little bit concerned about any more numbers here, but I
13 believe that for this study we have 105 is what we used
14 here, but I will cross-check that. I believe that in Baron
15 database that there is 107 route days that were in the
16 random sites, but I would have to double check that. It
17 might be 105.

18 Q Well, there couldn't be more routes in --

19 A Well, there is, I believe --

20 Q -- Baron than there are in the total study going
21 beyond Baron, could there? You didn't give Baron more than
22 you had?

23 A No. We did not give Baron more than we had. I
24 believe that the data that is on this sheet here comes from
25 105 route days worth of data.

1 Q Okay. Now, then under Column G, this is a number
2 we have seen for the first time, All Routes Combined, you
3 show number of route days of 1,020. Do you see that?

4 A Yes.

5 Q And this compares to the 844 route days that were
6 given to Baron? Or I should say it is in contrast to the
7 844 given to Baron.

8 A Correct.

9 Q How does this relate to the 961 route days that
10 are shown in Advo-61?

11 A The 961 route days that are in Advo Number 61 are
12 the route days of which we had hard copy records of in order
13 to go back and verify the information.

14 Q Now, in terms of the deliveries that you show -- I
15 guess it's that third through that 10th line down, are
16 deliveries by delivery type; do you see that?

17 A Yes.

18 Q Where does this information come from?

19 A This information came from records that the data
20 collectors scanned into the database.

21 Q What records?

22 A The -- you're talking about the 1 through 8
23 delivery types; is that correct?

24 Q Right.

25 A So the number of how many residential others,

1 residential curb, those, the number of delivery types are on
2 the routes.

3 One of the datapoints that we collected was that
4 information, and that information was scanned into an
5 electronic dataset for the possible types of delivery points
6 on the routes that are represented by the 105 routes.

7 There were 15,364 residential other delivery
8 types.

9 Q So you're saying this represents tallies, counts
10 of tallies?

11 A No. It does not have anything to do with counts
12 of tallies. On the 3999Xs that we were using for routes out
13 in the field, on the last page of those -- and I forget
14 where it is. I showed an example in one of my answers to
15 one of my interrogatories -- we scanned in the number of
16 delivery points, the Types 1s, 2s, 3s that were represented
17 on each one of those routes from that.

18 Q Okay. Now, I think I perhaps understand.

19 This was not part of the scanning of the Level 10
20 through 11.4.1 activities; this was a part of the numeric
21 entering of counts.

22 A Correct.

23 Q In other parts of the database?

24 A Correct.

25 Q Okay, so the source of these is then like From

1 3999s?

2 A 3999X, correct.

3 Q Were there any other sources?

4 A I believe that was the source that we used for
5 this information.

6 Q Now, then, if we wanted to calculate total
7 deliveries for each of these various columns, we would
8 simply add up those delivery types 1 through 8?

9 A Correct.

10 Q And what were the sources of the volumes shown
11 down below the deliveries?

12 A Those volumes would have been the number of -- the
13 volume that the data collectors collected out on the routes
14 during the days that they were following the ones that we
15 had the electronic information for.

16 Q So that if you divided -- if you added up all
17 these volumes per route day, and, for example, multiplied by
18 the number of route days, you would get total volume?

19 A If you were to take the 105 days on the management
20 collected routes and multiplied that times the 832, then
21 multiply that times the 440 and sum all those up, you would
22 get the total quantities.

23 Q Well, I'm not -- I want to make sure that we
24 understand each other. You total up all of the volumes per
25 route day?

1 A There were 105 days worth of volume information
2 that we had which said that the average letter volume per
3 route day was 832 letters per route day.

4 And that came from the random-picked sites, and
5 there were 737 average letters per route day for the routes
6 that came from the management-picked sites.

7 Q What's the difference between the nature of the
8 volumes, the average volumes per route day that are shown
9 here and those shown in Advo-61, other than the fact that
10 this maybe involves some additional routes?

11 A I said that the 161 came from going back through
12 all of the hard copy records that we could, that we had
13 available to create the answer to Number 61.

14 And in this particular case, we accepted the fact
15 that we had information in our electronic database which may
16 be off by some slight number of route days that was in the
17 electronic database, and used that information to compile
18 this response here.

19 Q Are you saying those volumes were from different
20 -- those two volume sets were from different sources?

21 A I would say that they were from the same process
22 that took place, but we went back through. In order for 61,
23 we went back through all of the manual records to take and
24 go through all of the volumes that were there, and that's
25 what that set of information is referencing to.

1 For this particular response here, we had
2 information that was in an electronic database, and that's
3 what we used to create this response, this particular table.

4 Q But the electronic -- is the electronic database
5 simply the electronic version of the hard copy sources that
6 you used, or is it something different?

7 A It would be possible for it -- it is possible that
8 it would be different, because, you know, if we look at the
9 dataset, the number of total days that are represented in
10 one dataset, doesn't match the exact number of route days
11 that were in the electronic dataset; there is a variance
12 there.

13 Q Now, --

14 A Now, this data set was done when we compiled this
15 document, it was from the information that we had available
16 to us at the end of our Phase 1 and Phase 2, as we were
17 compiling all of this information, and this is what was in
18 our electronic data set. And at that particular time, when
19 we looked, as we would go through these various records, we
20 would look at things like average number of letters per
21 route day from our random pick at 832, compared to the 737.

22 For our purposes, we felt that that was extremely
23 close and we did that for all of the various records that
24 are recorded in this data set to determine if there was any
25 significant difference between what was happening from a

1 random generated set of routes versus what was happening
2 from a Post Office set of selected sites where we went out
3 and studied the routes, picked the routes at random.

4 Q This may take a little bit of -- well, you have
5 got the spreadsheet there in front of you. Can you take a
6 look at Advo-61 while you have your spreadsheet nearby?
7 Let's start with the Postal Service selected data that is on
8 page 18 of Advo-61. The first volume figure there is 555.3
9 letters per day. Do you see that?

10 A Right.

11 Q If you look at the spreadsheet, management
12 selected letters per day is 737. Does that seem to be a
13 significant difference?

14 A Yes.

15 Q And in this case, the Advo-23 figure is
16 substantially higher, right?

17 A Correct.

18 Q Now, let's look at -- just pick the -- go to the
19 random site page, which is the very last page of 61. And if
20 you would look at flat volume, there it shows flat volume of
21 -- excuse me, where am I at here?

22 A The fourth column in.

23 Q Well, let's see, I think I may have the -- at
24 random sites, Advo-61 shows flat volume of 802, is that
25 correct? 802 pieces per route day?

1 A I think we might have delivery points mixed up. I
2 don't want to get these two mixed up here, Tom. The 465 is
3 -- and then there is what? So, the first number is like
4 601, this number of delivery points.

5 Q That is -- well, I believe, if you go two pages
6 earlier, you will see the headings, and that is what I
7 understand --

8 A Right. And then the next column over is your
9 letters where the 456.5.

10 Q That's correct.

11 A And then flats is 802.7 or something, whatever
12 that number is.

13 Q Right. So let's just call that 802. I know you
14 could round it up.

15 A Whatever.

16 Q 802 flats on random routes in Advo-61. Now, can
17 you look at your spreadsheet and tell me what the figure is
18 for flats on random routes?

19 A 440.

20 Q Is 802 significant different from 440?

21 A Yes.

22 Q And as far as we know the principal difference is
23 that one of these includes 961 route days and the other one
24 includes 1,020 route days. The divergences in the volumes
25 per day seem to be substantially greater than the difference

1 in the number of route days we are dealing with here. Do
2 you have any explanation for that? Are these different
3 because of the volumes?

4 A I would have to go back through and check. I
5 would have go back through and check the isolated records to
6 see where it is.

7 MR. McLAUGHLIN: Mr. Chairman, I hope you
8 appreciate the problems we are running into here. I can go
9 through the other volume figures here for letters, flats,
10 parcels, accountables and DPS, random versus Postal Service,
11 Advo-61 versus Advo-23. We can go through deliveries. We
12 have also had some serious problems trying to figure out
13 what the difference is between the total data given to the
14 Postal Service -- excuse me, the grand total of volumes and
15 deliveries compared to the volumes and deliveries that were
16 given to Baron and what is left over, what was left out.

17 We are having problems with all of these things.
18 I think we need to get -- I mean I hate asking for
19 additional stuff this late in the case, but we need to get
20 an electronic version of whatever data it is in ADVO-23 in
21 that spreadsheet and by electronic version I mean electronic
22 version of the source materials for the volumes and the
23 deliveries that are shown in ADVO-23.

24 It is obviously that there is a disparity between
25 these numbers and we have no clue, we haven't seen it, and

1 it is apparent that the Postal Service doesn't at this
2 moment have any clue --

3 CHAIRMAN GLEIMAN: Now let me stop you. You can
4 save it for brief or direct case or whatever. Is the
5 material that Mr. McLaughlin is talking about available in
6 electronic form, the information?

7 THE WITNESS: I'd like to check that because the
8 particular information that we have that supported this
9 Library Reference were things we created back in 1996 and
10 1997 and 1998 and sometimes that might be a little bit
11 difficult to get the exact electronic database. The
12 information that was on the spreadsheet would be there, but
13 we will attempt to do that.

14 I can probably give you an answer ont that
15 tomorrow or --

16 CHAIRMAN GLEIMAN: Well, if possible, tomorrow and
17 if not as soon thereafter as is possible about the
18 availability of the data and if the information -- I can
19 appreciate the position in which you find yourself, Mr.
20 McLaughlin. If the information is not available then I cut
21 you off a moment ago because obviously there are inferences
22 that can be drawn and argued later on. We will just leave
23 it at that, so we will hear back from the witness and/or his
24 counsel about the availability of the information and then
25 we will take it from there.

1 We are at ten minutes and counting at this point,
2 and I don't know whether you -- I don't have a problem with
3 you continuing for awhile longer. I don't know whether this
4 is a good point for you to stop for the evening?

5 It is your shot to call.

6 MR. McLAUGHLIN: This is probably a good place to
7 stop. I am not sure it makes too much difference and in
8 fact -- well, let me just add one other thing.

9 CHAIRMAN GLEIMAN: Let's just go off the record
10 for a moment.

11 [Pause.]

12 MR. McLAUGHLIN: Mr. Chairman, I did have one
13 other inventory question.

14 I hope there won't be too many others, but we will
15 have to wait and see. We had previously mentioned getting
16 an electronic version of the witness's response to compelled
17 Interrogatory MPA-56.

18 It just occurred to me that that was one of those
19 Library References that had data for only the 844 route days
20 that were in Baron's database. It did not include
21 information for these additional routes, and I would ask
22 that the information, the electronic information that is
23 going to be provided would provide that as well, that
24 additional information as well.

25 With that, I am fine with closing down for the

1 day.

2 CHAIRMAN GLEIMAN: Mr. Cooper, do you want to add
3 that one to the list? Do you understand what it is that was
4 being requested?

5 MR. COOPER: I believe he is asking for an
6 additional set of CY code or route days that were not
7 included, that go beyond the 844 for MPA-56.

8 MR. McLAUGHLIN: It is whatever we have been
9 talking for example about the apparently 1020 route days
10 that are referred to in ADVO-23, in the spreadsheet in
11 ADVO-23, so I think it would be for that.

12 I would just hope there would be some way
13 perhaps -- let me check with -- I know what we want. There
14 may be a question about format so that it is easy to
15 distinguish what is in Library Reference 163 versus what is
16 not, but I can check that with Mr. Cooper informally.

17 CHAIRMAN GLEIMAN: I'd appreciate that.

18 Let me also say that I recognize that the time for
19 discovery on the Postal Service's case has come and gone,
20 but I also recognize that there are outstanding requests
21 that are subject to motions to compel and objections and
22 also there are obviously a number of follow-ups, and I just
23 want to encourage parties that have outstanding requests and
24 also the Postal Service to try and work together informally
25 to resolve some of these matters in as expeditious a manner

1 as is possible.

2 I said earlier on today that we were going to make
3 sure that the rights of the parties were preserved with
4 respect to the need for follow-up and I fully intend to do
5 that, but at the same time we do have the clock running on
6 us and to the extent that parties and the Postal Service can
7 help us and help themselves in that regard I think we will
8 all be better off in the final analysis.

9 MR. McLAUGHLIN: Mr. Chairman, I would just simply
10 add to that that with respect to that question that we had
11 earlier about the videotapes, where we had just been told
12 today that there were tens of thousands of documents that
13 would be involved with that, I very much want to work with
14 the Postal Service to limit that, if at all possible, as I
15 thought we had understood previously, because we don't want
16 10,000 documents ourselves, the Commission doesn't want
17 10,000 more documents.

18 CHAIRMAN GLEIMAN: You just don't want to --

19 MR. McLAUGHLIN: I don't think we need 10,000 more
20 documents. There is a lot we need, but I don't think we
21 need that.

22 CHAIRMAN GLEIMAN: Well, you are just concerned
23 that they are going to submit them in-camera and you are
24 going to have to initial every page.

25 [Laughter.]

1 CHAIRMAN GLEIMAN: But we might be able to
2 overcome that one. We did it earlier on in the proceedings
3 when you were kind enough to bring that matter to our
4 attention, so with that then I think we are going to call it
5 an evening.

6 We will pick up and I suspect that Mr. McLaughlin
7 will show up tomorrow morning on behalf of ADVO and continue
8 his cross examination. We will take it from there and just
9 a reminder that we have the possibility of a closed session
10 when we finish with the first round of cross examination
11 tomorrow. You all have a good evening -- 9:30 tomorrow
12 morning.

13 [Whereupon, at 5:56 p.m., the hearing as recessed,
14 to reconvene at 9:30 a.m., Wednesday, May 10, 2000.]

15
16
17
18
19
20
21
22
23
24
25

