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Before the
UNITED STATES POSTAL RATE COMMISSION

In the Matter of: **POSTAL RATE AND FEE CHANGE**

Docket No. **R2000-1**

VOLUME 19

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BEFORE THE
POSTAL RATE COMMISSION

- - - - -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 XIX
Wednesday, May 10, 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
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C O N T E N T S

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
LLOYD RAYMOND				
BY MR. MCLAUGHLIN		8020/8086		
BY MR. BAKER		8057		
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BY MR. COOPER			8122	
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E X H I B I T S

EXHIBITS AND/OR TESTIMONY	IDENTIFIED	RECEIVED
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P R O C E E D I N G S

[9:33 a.m.]

CHAIRMAN GLEIMAN: Good morning. We continue our hearings to receive testimony of Postal Service witnesses in support of R2000-1.

When we stopped last night, Postal Service Witness Raymond was undergoing cross examination by counsel from Advo. We will pick up there in a just a moment.

First, I have a procedural matter. Parties have designated a mass of institutional responses for incorporation into tomorrow's transcript. Three participants requested the opportunity to conduct clarifying cross examination on answers provided by the Postal Service as an institution on answers that were provided after a witness was excused from the hearing.

The Alliance of Nonprofit Mailers focuses on an answer provided by Witness Tayman. KeySpan Energy is concerned with institutional responses to questions initially addressed to Witness Campbell.

The Major Mailers Association would like further clarification on answers to questions posed to both Witness Miller and the Postal Service itself on undeliverable-as-addressed mail.

Additionally, MMA preserved its opportunity to seek clarification of answers on costing methodologies that

1 were still to be provided.

2 Because of the variety of topics, the Postal
3 Service may have to provide several individuals to respond
4 to these points. I know there has been a limited amount of
5 time to identify appropriate witnesses who might be able to
6 appear tomorrow.

7 Therefore, I'm inclined to adjust tomorrow's
8 schedule. We have two witnesses scheduled tomorrow,
9 Witnesses Unger and O'Tourmey on flats periodicals costs.

10 Mr. Cooper, I know that you were here all day
11 yesterday, so I'm not sure that you had an opportunity to
12 pursue the matters associated with the institutional
13 responses.

14 So if you don't, I'll ask your co-counsel, Mr.
15 Koetting.

16 MR. COOPER: Yes, my colleague, Mr. Koetting, can
17 speak to that.

18 CHAIRMAN GLEIMAN: Okay. I request that you, if
19 you have not already done so, contact your colleagues and
20 report to me later today on whether the Postal Service --
21 what the Postal Service's preferences are with respect to
22 the clarifications on the institutional responses, whether
23 we should begin with Witnesses Unger and O'Tourmey or
24 whether, given the fact that we're going to have to ask
25 people to change their schedules to appear tomorrow, you'd

1 like to arrange to have others appear first.

2 If possible, I'd like to accommodate not only the
3 Postal Service, obviously, and its witnesses, but also
4 counsel who have asked to cross examine. The purpose of
5 allow the cross examination on these responses is to
6 clarify, not to allow questioning on a witness's entire
7 presentation.

8 So, I was just wondering whether you could share
9 any of your thoughts with us on who, how many, when, for
10 tomorrow?

11 MR. KOETTING: Mr. Chairman, as you indicated,
12 there is still some uncertainty as to exactly how these
13 matters will be resolved. I know there was -- at least it's
14 my understanding that there was at least one response to a
15 pleading filed by the Postal Service yesterday.

16 It is my understanding that there will be someone
17 from finance here to address Mr. Levy's questions about
18 depreciation. With regard to the request by MMA and
19 KeySpan, I know that there are still discussions going on
20 between my colleague, Mr. Tidwell, and Mr. Hall, and it's
21 not clear how that will be resolved, although it's my
22 understanding that there is a possibility that the Postal
23 Service will also have at least one witness in that area,
24 although, again, that's still uncertain at this time.

25 Mr. Levy, I believe, will be here addressing

1 questions to Witnesses Unger and O'Tourmey. Given the fact
2 that it's still uncertain, exactly how the other situations
3 will resolve themselves, I believe it will be the Postal
4 Service's preference to go forward with Mr. Unger and Mr.
5 O'Tourmey, and see where we're at with the other witnesses.

6 CHAIRMAN GLEIMAN: All right, well, if you could
7 check back with Mr. Tidwell and let us know, perhaps after
8 the lunch break today, whether we need to do any adjusting,
9 or whether we should just make arrangements to add any
10 witnesses associated with those institutional responses or
11 clarifications at the end of the regularly scheduled
12 witnesses.

13 MR. KOETTING: We'll check back and get back, Mr.
14 Chairman. Thank you.

15 CHAIRMAN GLEIMAN: I appreciate that.

16 MR. McLAUGHLIN: Mr. Chairman?

17 CHAIRMAN GLEIMAN: Yes, sir?

18 MR. McLAUGHLIN: On that same general topic, there
19 were some institutional responses that we received last
20 week, after the date for designations.

21 And I have had a chance to just briefly glance at
22 some of those, and we have not had a chance to determination
23 designations, partially because of the hearings that we're
24 in right now.

25 Do you have any suggestions as to how we should

1 handle that? Obviously, we will get that information into
2 you as quickly as possible, as to whether any of those later
3 filed institutional responses should be designated.

4 I might also add that I believe that most of these
5 were also delayed responses. But that is a problem that we
6 face, and I just wanted to check with you and see if you
7 have any suggestions on how best to handle that.

8 CHAIRMAN GLEIMAN: Well, assuming that we get out
9 of here at a reasonable hour today, you may have an
10 opportunity to review the materials, you and your colleagues
11 may have an opportunity to review the materials and perhaps
12 before the end of the day tomorrow, let us know whether
13 there are additional designations.

14 But certainly I would entertain a motion for late
15 acceptance of designated institutional responses. Again --

16 MR. McLAUGHLIN: But your strong preference would
17 be to get those by tomorrow; is that correct? I think that
18 shouldn't be a problem, but --

19 CHAIRMAN GLEIMAN: The preference, of course,
20 would be to get it all in tomorrow and to lock up this round
21 of the hearings and the transcripts. But I understand the
22 time constraints that everyone has been operating under, and
23 also the timing of relative responses.

24 And we will make accommodation, if necessary,
25 pursuant to a motion that you might file, if that becomes

1 necessary.

2 Is there any other matter that anyone wishes to
3 raise this morning?

4 MR. COOPER: Mr. Chairman, in yesterday's hearing,
5 it was brought to my attention that two Library References
6 that had been mentioned in interrogatory responses had not
7 been filed.

8 I went back to my office, and I believe we have
9 located the two files that were intended to be filed. I
10 didn't have time to make the copies and actually get them
11 filed yet.

12 However, I would like you to witness that I'm
13 going to be handing diskettes containing these files to
14 counsel for Advo, and I will file them as soon as possible.

15 In addition, counsel yesterday requested
16 machine-readable versions of various tables contained in
17 answers to Advo and MPA interrogatories, and I'm providing
18 those today, as well.

19 CHAIRMAN GLEIMAN: Mr. Cooper, I know that Advo
20 counsel appreciates it, and I certainly personally and on
21 behalf of the Commission as a whole, appreciate your
22 diligence. It's what we've come to expect from just about
23 everybody in the legal shop over at the Postal Service in
24 these sometimes complicated and contentious proceedings.

25 So, again, thank you for attending to that matter.

1 Mr. McLaughlin?

2 MR. McLAUGHLIN: Yes, there was just one other
3 preliminary item, and that was, yesterday, when you had
4 mentioned that there were Library References that had been
5 referenced in responses that hadn't yet been filed, there is
6 one other one that we're aware of.

7 And this is not one that we're suggesting any
8 lateness on, but in Witness Baron's response to Advo
9 Interrogatory 11 to him, there was a reference to a
10 to-be-filed Library Reference.

11 I just simply wanted to remind the Postal Service
12 that that's on the table.

13 MR. COOPER: Advo 11 to Baron?

14 MR. McLAUGHLIN: I think it was Advo 11 to Baron.
15 It references -- I believe it even gives a or refers to a
16 Library Reference LRI-310 to be filed.

17 And as far as I know, that has not been filed.
18 I'm not suggesting tardiness or whatever.

19 CHAIRMAN GLEIMAN: I understand, and we appreciate
20 your bringing that matter to our attention. I'm sure that
21 the Postal Service does, too. As I said, you know, this has
22 been a complicated proceeding so far, and every once in
23 awhile, something slips through the cracks at one end or the
24 other of the street.

25 And it's helpful to have parties give us notice

1 when either we or the Postal Service have gone slight awry.
2 So I appreciate that.

3 MR. McLAUGHLIN: I guess there is one other just
4 general preliminary matter. Yesterday there were a lot of
5 items that were discussed that were not able to be answered,
6 some of them in the nature of obtaining additional
7 information or whatever.

8 In terms of the question of electronic documents,
9 we'd just like to make it clear that with the exception of
10 things like narrative type responses, we would request that
11 all documents that involve more than just a minimal amount
12 of data, be provided, if at all, in electronic form.

13 A hard copy is nice as well. If it turns out that
14 for any particular document, there is a particular reason
15 why it's difficult to obtain electronic format, I would ask
16 that Postal Service counsel contact us early on and explain
17 the problem, so that we can try to work around that.

18 Obviously, for these kinds of things involving
19 databases, hard copy is not a very convenient, and in some
20 cases, is basically a useless format.

21 So, I would simply request that all documents be
22 provided in electronic if they involve data, and that if
23 there is a problem with that, we be contacted to discuss it.

24 CHAIRMAN GLEIMAN: I suspect that the Postal
25 Service has not problem with that approach to this matter.

1 Is that correct, Mr. Cooper?

2 MR. COOPER: That's correct; we had pretty much
3 assumed, from hear on out, that if we have a table of data,
4 that we'd be providing it in electronic format as well.

5 CHAIRMAN GLEIMAN: Yes. I remember in olden times
6 when everybody used to drag lots of notebooks in here every
7 day and we didn't have laptop computers and we didn't have
8 computers. Therefore, we didn't have Excel.

9 I just wonder how it was. Maybe rate cases were
10 simpler. I don't know.

11 MR. McLAUGHLIN: That might have been the good ol'
12 days.

13 CHAIRMAN GLEIMAN: In some respects, perhaps they
14 were. Less is more in some cases, I guess.

15 In any event, if there's nothing further then, Mr.
16 McLaughlin, if you'd like to pick up where you left off,
17 sort of, kind of, last night?

18 MR. McLAUGHLIN: I'm not exactly sure where I left
19 off. One other thing I would mention, Mr. Chairman, is that
20 it's now quite obvious, given the large number of
21 outstanding interrogatory responses, as well as the large
22 number of questions that were either unanswered or for which
23 additional information is going to be provided, that Mr.
24 Raymond will need to be recalled at some time in the future
25 to address those items.

1 And in that light, I have gone though the
2 cross-examination that I had remaining to cover. And I am
3 going to try to chop out chunks that I think might more
4 appropriately or logically be dealt with after we have
5 received the other interrogatory responses, because I think
6 that it might be somewhat fruitless to go into those in
7 advance of having seen the responses, particularly since
8 some of the interrogatories that are outstanding relate to
9 some answers that have been given to responses that have
10 been received. So, if you will bear with me as I am going
11 through my cross-examination, I may have to scan through my
12 notes to see where the next step should be for this
13 proceeding here.

14 Whereupon,

15 LLOYD RAYMOND,
16 a witness, having been recalled for examination and, having
17 been previously duly sworn, was examined and testified
18 further as follows:

19 FURTHER CROSS-EXAMINATION

20 BY MR. McLAUGHLIN:

21 Q I am not exactly sure where we had left off
22 yesterday, but I know that we were very close to the end,
23 talking about the spreadsheet that is referenced in your
24 response to Advo-23. That was the spreadsheet that
25 contained your comparisons of random to management selected

1 sites that we were discussing yesterday. You do recall
2 that, don't you?

3 A Yes.

4 Q Now, we had asked you a number of questions about
5 the sources for information toward the top of that
6 spreadsheet, and I understand you will be providing that
7 information. Another question I have is I assume that all
8 of this information is basically, in terms of any average
9 information, it is sort of simple average type stuff?

10 A Yes.

11 Q You haven't weighted it for the fact that some
12 routes were sampled many more days than others, or that some
13 CY codes had many more observations than others, is that
14 correct?

15 A That's correct.

16 Q Okay.

17 A Just straight averages.

18 Q Now, that spreadsheet also has a lot of other
19 lines on it, and those, most of those other lines represent
20 percentages, is that correct? The cells, for example, from
21 basically line 36 of the spreadsheet on down are I think
22 just about all percentages.

23 A Tom, I am going to look up a hard copy that I have
24 here.

25 Q I think I have got a hard copy here that I can

1 show you.

2 A Okay.

3 Q On the spreadsheet that is line 36.

4 A Okay.

5 [Pause.]

6 MR. McLAUGHLIN: Mr. Chairman, I was just
7 consulting with the witness to identify certain line numbers
8 that appear on the spreadsheet in the electronic format that
9 don't appear on our hard copies because the cells don't show
10 up as a numbered cell on the hard copy.

11 BY MR. McLAUGHLIN:

12 Q And I believe you indicated that, basically, from
13 line 36 on the spreadsheet on down are basically all
14 percentages, is that correct? The numbers there all
15 represent percentages?

16 A Yes.

17 MR. McLAUGHLIN: Okay.

18 MR. COOPER: Mr. Chairman, for clarification on
19 the record, I don't have a document that has line numbers on
20 it, so I am having a hard time following this.

21 MR. McLAUGHLIN: Oh, okay. Okay. Line 36 is
22 captioned "Work Sampling Information."

23 THE WITNESS: It breaks right after the sheet that
24 he passed out yesterday.

25 MR. McLAUGHLIN: Yes. It is basically the line

1 that starts right after the sheet that we had yesterday.

2 THE WITNESS: Where it says, "Total number of
3 Employees."

4 MR. COOPER: If it is possible, I think it would
5 help the record if we could have copies made and included in
6 the transcript just so that it is clear what is being
7 discussed, because I don't have that information.

8 MR. McLAUGHLIN: Well, what I would say, Mr.
9 Chairman, is I am not going to be asking questions about
10 these numbers today. I am simply going to be asking for
11 some additional information relating to these numbers.

12 MR. COOPER: In that case, as long as the witness
13 can follow it, we will try to respond.

14 MR. McLAUGHLIN: Let's try it this way. I think
15 the witness will be able to follow.

16 CHAIRMAN GLEIMAN: That's fine. Let's just do it.

17 MR. McLAUGHLIN: Okay.

18 BY MR. McLAUGHLIN:

19 Q When we click on the cells in the spreadsheet, and
20 let's say that the numerical value in the cell is 15
21 percent, when you click on that cell, it is not an equation,
22 it is just a number, .15, correct?

23 A Correct.

24 Q Okay. So it doesn't show the underlying numbers
25 from which these were calculated, is that right?

1 A That's correct.

2 Q Okay. What I would like to obtain is for
3 spreadsheet lines 146, which begin with the category
4 "Outside Work Breakdown," through line 315, which is just
5 before the "VIM Room Delivery" category, to have the actual
6 figures upon which these calculations were based. Do you
7 understand what I am asking? The actual tally figures upon
8 which these calculations were based.

9 A I am trying to think about how we would isolate
10 those things in a database that is associated with this,
11 Tom. This, here again, came from the entire composite
12 database that we have. An extremely -- there is like, I
13 think 170,000 records in this database and there is custom
14 software that was written that would extract this
15 information from that entire database. So, if you are just
16 looking for the specific work sampling tallies that are
17 associated with this, an attempt to replicate these numbers,
18 I find -- I think that would be an extremely difficult thing
19 to do.

20 Remember the books that we showed in one of the
21 technical conferences where we had the various bar charts
22 and graphs of each one of the breakdowns as we went through
23 the entire process, and I believe that one of the
24 interrogatories that have been filed have asked for a set of
25 those graphs that show -- when that interrogatory and that

1 Library Reference is in your possession, you will see on
2 those charts where all these various numbers came from, or a
3 lot of these numbers came from.

4 MR. COOPER: If I may, Mr. Chairman, I think this
5 may be one of those things that we can work out offline and
6 try to provide some supportive material.

7 As I understand it, this is not a subset of a
8 larger spreadsheet where there are links that we could
9 easily provide but we may be able to provide what counsel is
10 looking for.

11 CHAIRMAN GLEIMAN: Counsel, does that suit your --

12 MR. McLAUGHLIN: Mr. Chairman, I am willing to
13 give that a try. We'll see what we can do.

14 One other question or at least another question
15 with respect to all of these cells in the spreadsheet that
16 include percentages. I take it these again are unweighted
17 percentages in the sense that routes or zip codes that are
18 sampled many times are not weighted against those that are
19 sampled just a few times, is that right?

20 THE WITNESS: That's right. It's for every route
21 day -- it's absolute raw data.

22 MR. McLAUGHLIN: Raw? Okay.

23 THE WITNESS: It's data that has been corrected
24 through the field editing process --

25 MR. McLAUGHLIN: Right, but in terms of the

1 percentage comparisons it is routes that were sampled many
2 days carry more weight than those that were sampled only one
3 day in terms of the percentages figures.

4 THE WITNESS: Correct.

5 MR. McLAUGHLIN: Mr. Chairman, just in general I
6 would say we have a lot of things on the lists, sort of like
7 "to do" projects and I have not had a chance to go back
8 through the transcript. Just in general it seems to me that
9 at some point we will need to go back through the transcript
10 and double-check that list against what comes in.

11 I assume the Postal Service will be doing that as
12 well, just so that we'll be able to track all of the
13 outstanding requests.

14 BY MR. McLAUGHLIN:

15 Q Can you turn to your response to MPA-20?

16 COMMISSIONER LeBLANC: What was that, Mr.
17 McLaughlin?

18 MR. McLAUGHLIN: MPA-20.

19 BY MR. McLAUGHLIN:

20 Q This concerns the procedure by which random sites
21 were selected.

22 A I am getting close. I found it.

23 Q In the first sentence of your response you say
24 that you used Excel to generate a random number. The second
25 sentence then says, "The Postal Service picked the sites in

1 my presence from a listing of finance numbers."

2 If the number was generated randomly, why did the
3 Postal Service pick the site?

4 A The COR for the project had a master list of
5 finance numbers for the post office and I sat there on my
6 computer and said, hey, we are going to pick these randomly,
7 so I generated a random list using Excel and then I was in
8 his presence and I would say the first random number is,
9 like 19872, and he would go down the list of finance numbers
10 and find 19872 and, bingo, that was going to be the site
11 that we went to.

12 Q Okay, so in other words the random number was used
13 to match with the selected site.

14 A Right.

15 Q Okay. I figured that was probably the case but
16 your response was worded a little -- had some ambiguity in
17 it but now I understand.

18 Turn to Advo Interrogatory 80, please.

19 A Yes.

20 Q I just noticed that it appears that three are
21 three observer codes missing on this response. It's
22 observers 59, 60 and 61. Can we get the information for
23 those three for this response?

24 MR. COOPER: What were those observer numbers
25 again?

1 MR. McLAUGHLIN: 59, 60 and 61.

2 THE WITNESS: Oh, excuse me. Yes, we will get
3 that information for you.

4 BY MR. McLAUGHLIN:

5 Q Now, turn to Advo-83, please. It's just a couple
6 after that.

7 [Pause.]

8 A Yes, I have located that.

9 Q On the second and third pages of that response,
10 you provide two different tables of numbers.

11 The second table states that it's data used by
12 Witness Baron. I take it that this table here represents
13 just information that's in Library Reference 163; is that
14 correct?

15 A I believe that's correct, yes.

16 Q How about the table that you provided before that
17 one; is that limited strictly to routes and tallies that are
18 included in Library Reference 163 or does it go beyond that?

19 A I'd have to double-check that.

20 MR. McLAUGHLIN: Mr. Chairman, here's another
21 situation where we have possibly -- we have different sets
22 of data that we've been discussing.

23 I do want to get confirmation as to whether those
24 numbers represent the same dataset. But I think we also
25 need to get information that relates to the broader set as

1 well.

2 BY MR. McLAUGHLIN:

3 Q Is that something that is doable? In other words,
4 Mr. Raymond, you show the information that Mr. Baron had on
5 that one table. Your other table may or may not relate just
6 to those route days.

7 What I would like to do is have you confirm
8 whether it's the Baron dataset or some other dataset.

9 And in either case, I think we'd like to get the
10 information for the reciprocal part. In other words, if
11 this is the Baron dataset, we'd also like to get the numbers
12 for the broader dataset; do you follow that?

13 A I understand, yes.

14 CHAIRMAN GLEIMAN: Mr. McLaughlin, if I could
15 interrupt for just a moment, I was wondering whether, as I
16 listened to you yesterday and again this morning, whether
17 other counsel have similar problems with the datasets that
18 appear in Mr. Raymond's testimony, supporting documents, and
19 interrogatory responses.

20 Would anybody just care to comment briefly, that
21 they have similar questions or do not have questions of that
22 nature? Mr. Baker, Mr. McKeever? Mr. Costich? I didn't
23 want to leave you out.

24 MR. COSTICH: Mr. Chairman, the OCA does not have
25 questions of this nature.

1 CHAIRMAN GLEIMAN: Okay, thank you.

2 MR. MCKEEVER: Nor does United Parcel Service, Mr.
3 Chairman.

4 CHAIRMAN GLEIMAN: Mr. Baker?

5 MR. BAKER: The same for me.

6 CHAIRMAN GLEIMAN: Thank you. The reason I was
7 making an inquiry, just so you won't be left scratching your
8 heads about yet something else, is that it occurred to me
9 that if others were having similar problems, that we might
10 want to consider, even at this late date, arranging for
11 another technical conference that could narrow some of the
12 issues.

13 I know that there was a technical conference
14 earlier on that was followed by some exchanges and
15 opportunities, albeit limited, to look at material,
16 including tapes.

17 I posit the question, even having heard that the
18 others do not have similar questions. Mr. McLaughlin, Mr.
19 Cooper, is there a possibility?

20 I mean, we now have a sense of what many of these
21 questions are about. Is there a possibility that some of
22 this could be dealt with in a technical conference, and
23 would the two of you be amenable on behalf of your
24 respective clients?

25 Again, I would put this in the context of the need

1 to ensure that remaining questions that needed to be asked
2 on the record would ultimately -- that an opportunity would
3 ultimately be provided to ask those questions on the record,
4 and/or to submit supplemental designated written materials,
5 written cross examination that would fill in the blanks.

6 But in that context, the question arises in my
7 mind, whether you want to pursue many of these questions
8 about datasets now or whether it could be resolved in a
9 technical conference. And I'll let the two of you talk for
10 a minute.

11 MR. McLAUGHLIN: Well, I think, Mr. Chairman, the
12 answer is that I'm not sure. It may be that there are some
13 technical aspects to, for example, responding to some of
14 these questions that might be addressed.

15 I suspect those are perhaps sort of going to be on
16 a case-by-case basis. We are interested in getting the
17 data.

18 And obviously, to the extent that we want to
19 understand what the data represents, there may be some use
20 in doing that.

21 I'm not sure it would make sense to hold a formal
22 technical conference. Perhaps what might be done is
23 something maybe more informal. To the extent that the
24 Postal Service has questions about what we are requesting or
25 if there are problems with the particular format that it has

1 been requested in or whatever.

2 What I would suggest is that we try -- that the
3 Postal Service alert us to any problems they have, and we'll
4 try to work those out informally. It goes along with the
5 earlier discussion we had, for example, about the request
6 for documents accompanying videotapes. And there may be
7 things that come up that warrant discussion, but I'm not
8 sure a formal technical conference is going to be quite the
9 way to handle that.

10 CHAIRMAN GLEIMAN: Okay. Mr. McKeever has
11 something that he would like to add.

12 MR. MCKEEVER: Thank you, Mr. Chairman. As far as
13 we were concerned, there was only one technical conference,
14 I believe, that we were aware of and that we did attend.

15 The word, technical conference, has been used
16 today, and I don't know if there were a number of them or
17 only one.

18 Certainly if there are discussions among counsel
19 on discovery issues, that's something that counsel involved
20 would take up among themselves with no need to involve other
21 parties.

22 But if there is going to be something that,
23 whatever it's called, that goes beyond just a discussion of
24 we've requested this and how can we get it and something
25 like that, then I do believe that it would be appropriate

1 for the parties to be given notice.

2 CHAIRMAN GLEIMAN: Thank you. To the best of my
3 knowledge, there was only one technical conference, and as
4 an adjunct to that, parties who were involved in the
5 technical conference were offered an opportunity to review
6 materials for a limited period of time in a particular place
7 where the technical conference took place.

8 I didn't mean to imply that there were other
9 technical conferences. And I understand your position and
10 the distinction that the two of you have drawn.

11 I think that it's -- let's not use any more of
12 today's time, unless you all insist, to discuss this. I
13 just thought that perhaps there was a way to get more of
14 this done outside of the hearing room than might otherwise
15 be the case. It doesn't appear that that's going to be so,
16 so let's just get on with it.

17 MR. COOPER: Mr. Chairman, if I may, just a brief
18 comment: The Postal Service is open to the idea of having
19 an additional technical conference if the parties wish it.

20 And also to clarify, there was an initial
21 technical conference early on in the proceeding. There was
22 an additional technical conference, pursuant to the
23 Presiding Officer's Ruling Number 27.

24 At that time, representatives of UPS, Advo, MPA,
25 and others were informed that if additional access was

1 requested, we would try to accommodate that, and we did.

2 CHAIRMAN GLEIMAN: Well, as I said, I appreciate
3 your clarification, and also your willingness to hold
4 another technical conference, but it seems to me that that
5 would complicate -- has the potential to complicate rather
6 than clarify, so I think the best thing to do is just
7 proceed on the record, and whatever informal discussions go
8 on between you and counsel for Advo on particular points
9 that were raised yesterday, today, and may be raised yet
10 later today, you'll address those in that context.

11 MR. McLAUGHLIN: Mr. Chairman, I might add that I
12 think I've gone through the majority of the information
13 where it looks like we need either clarification of
14 information or further information.

15 CHAIRMAN GLEIMAN: My timing was once again
16 perfect on even raising the issue; wasn't it?

17 [Laughter.]

18 MR. McLAUGHLIN: Okay.

19 CHAIRMAN GLEIMAN: The ball is still in your court
20 on cross examining, Mr. McLaughlin, and I apologize for
21 perhaps adding more confusion to an already complex
22 situation.

23 BY MR. McLAUGHLIN:

24 Q Mr. Raymond, I'd like to refer you now to page 14
25 of your testimony.

1 A Yes.

2 Q At line 18, you refer to the fact that after you
3 did a manual assignment of STS codes, you did a cross-check
4 by creating a master list. In Advo Interrogatory 22, Advo's
5 first set of interrogatories, we asked you to provide the
6 master list of scanned sequences. And your answer says,
7 "Please refer to Appendix D and Appendix F of my testimony."
8 Do you see that?

9 A That was Advo Number 22?

10 Q Yes.

11 A Yes, Tom, I have got my fingers in all these
12 little places now.

13 Q You see the response to Advo (d) there, correct?
14 Where -- you see your response, don't you?

15 A Where it says, "A record by record comparison was
16 performed."?

17 Q No, no, no. Excuse me. I am referring now to
18 Advo-22(d), which asked you to provide the master list of
19 scanned sequences referred to in your testimony.

20 A Yes.

21 Q Do you see that?

22 A Yes.

23 Q And your response to that is, please refer to
24 Appendix D and F of my testimony, is that correct?

25 A Correct.

1 Q Can you turn to Appendix D?

2 A Yes, I have Appendix D.

3 Q I believe Appendix D starts on page 24 of your
4 testimony. Is Appendix D the master list of scanned
5 sequences?

6 A That is the master list that we used in creating
7 the queries, that is, the identifications that went into
8 that.

9 Q Is this the master list of scanned sequences?

10 A I would say after all of the discussion and
11 comments that have taken place at this point in time, my
12 interpretation of what you are asking for now is different
13 than what my interpretation was probably when I prepared
14 this. I think what you are looking for is, in this case,
15 all of the tally sequences, all of the tallies.

16 Q Mr. Raymond, what we were asking for was for you
17 to provide the master list of scanned sequences. What did
18 you interpret that to mean?

19 A My interpretation was that these are the list of
20 the scans that are used. That is, if I look at these
21 various codes, like an L07, an L08 that is referred to in
22 Appendix D, and this is the list of the scans that were used
23 to create -- in the database. That is like L07 represents a
24 vehicle, WT03 represents park and loop activity. And
25 between what I have in this part of D and what I have in F,

1 identifies all of the scans that were in the database. That
2 identifies all the codes and all -- of all of the scans.

3 Q Let me ask you again, is Appendix D the master
4 list of scanned sequences?

5 A Tom, to me, the list that I have given in Appendix
6 D and Appendix F is the master list of scanned sequences
7 that were given in the Baron database. That represents the
8 list of all of the scans that are included in there. That
9 is what I would consider to be the master list that
10 identifies each one of what the scans would be.

11 Q Can you tell me how Appendix --

12 A Now --

13 Q No, go ahead. No -- if you had something else to
14 add, I would like to hear it.

15 A Well, it represents to me the identification -- I
16 was trying to use some other word other than master list,
17 but it represents the identifications or the master list of
18 all of the scans that were included in the database.

19 It is a master list. It is not a list of all of
20 the scans that are in there but it is the master list of the
21 scans that are in there.

22 Q In your testimony at page 14, line 18, you say,
23 "To cross-check the manual review process, a master list was
24 created of scanned sequences."

25 The Advo interrogatory related to the master list

1 that you used to cross-check the manual review process --

2 A Correct.

3 Q Is Appendix D the master list that you used to
4 cross-check the manual review process?

5 A Yes. That is. We have looked at all the
6 different permutations and combinations that were in the
7 database. In other words, we looked at how you group all of
8 these things by and what categories those fell in under, so
9 to me that is the master list.

10 MR. McLAUGHLIN: Mr. Chairman, I think I will at
11 this point drop any further inquiry at this time on this
12 particular interrogatory because there is an outstanding
13 interrogatory that among other things asks the witness to
14 explain precisely how Appendices D and F were used to
15 cross-check, and I will await the witness's response to
16 that, and we may be pursuing this question further at that
17 time.

18 It is obvious we are not going to get very far on
19 it today.

20 BY MR. McLAUGHLIN:

21 Q But it is your testimony today that Appendix D and
22 F are the master list of scanned sequences?

23 A If I were to take and look at Interrogatory F
24 where I have the six definitions of what went into the STS
25 categories -- that is to say for load time -- we looked at

1 the list of all of the scans and if I was at a page 35, a
2 point of delivery, and it was a park and loop and it was a
3 business outside and I was doing a finger at delivery point
4 and it happened to be a number one hand-slam box, then that
5 is what went into, from a master list perspective, that is
6 what went into a load time classification.

7 Q Is your answer then yes, that these are the master
8 list? Is that your answer?

9 MR. COOPER: I believe this has already been
10 answered but --

11 MR. McLAUGHLIN: I just want to have it confirmed
12 on the record because I am not sure I heard a yes.

13 THE WITNESS: I'd say from my perspective this is
14 what I consider to be the master list between D and F of
15 what was included in the database.

16 BY MR. McLAUGHLIN:

17 Q I'd like to now refer you to the portion of your
18 testimony that includes the bar codes that were used by the
19 data collectors. That is Appendix C, I believe.

20 [Pause.]

21 MR. McLAUGHLIN: Actually I think even better than
22 that is to refer to the Library Reference that includes the
23 full set of bar codes. I believe that is Library Reference
24 221.

25 [Pause.]

1 THE WITNESS: Yes, I have it.

2 BY MR. McLAUGHLIN:

3 Q And actually the first page of that is basically
4 the same as page 21 of your testimony, is that correct?

5 A Basically the same, yes.

6 Q Now does the document that we see in Library
7 Reference 221, does that represent the actual way that the
8 bar code sheet looked to the observer?

9 A The bar code sheets that were in 221 were not laid
10 out in this exact manner in the workbook that they used, but
11 these are a set of bar code sheets that would be used by an
12 observer in the field.

13 Q Now there is a date down in the lower left-hand
14 corner of that page of October 8th, 1996, do you see that?

15 A Yes.

16 Q When was that in relation to Phase 1?

17 A That would probably be at the beginning of Phase
18 1.

19 Q Okay. Now can you turn to -- I guess you can do
20 it both to page 23 of your testimony and it would be page 5
21 of the outside work sample in Library Reference 221.

22 Do you have those?

23 A Again, where are we? We are in 221, which page?

24 Q The pages are not numbered but it is -- at the
25 upper right-hand corner it says "page 5, outside work

1 sample."

2 It starts with 11.4 --

3 A Right.

4 Q -- outside activities.

5 A 11.4? Yes.

6 Q Now I'd note down at the bottom of this page there
7 is a handwritten date, 4-29-97. Isn't that date after the
8 start of Phase 2 of the data collection?

9 A It is about the start of Phase 2.

10 Q Why does it have a different date than the first
11 page? Why does it have a later date?

12 A We reformatted the bar code sheets between Phase 1
13 and Phase 2 based upon requests from the people that have
14 been doing the bar code scanning. There was also in Phase 1
15 when we were doing the bar code scanning that was used, if I
16 look at some of the event quantity information that is not
17 related to the work sampling but it is what we would call
18 the ergonomic information that is Level 13, that data was --
19 some of that data that was scanned in on bar code sheets
20 typically at the end of the day was added into the set that
21 the bar code scanners could use.

22 Q Were there changes made to this sheet that starts
23 with activity, outside activities, 11.4?

24 A To the best of my recollection, from Level 10,
25 11.1, 11.3, 11.4, 4.1, there may have been some formatting,

1 but I don't believe that we necessarily adjusted any of the
2 bar codes. I think the bar codes remain the same.

3 Q Do you happen to have any copies of the original
4 Phase 1 bar code sheet?

5 A I could check on that and see if we can find one
6 of the original bar coding manuals.

7 Q Now, it appears to me that we can probably go back
8 to your response to -- to page 23 of your testimony, just to
9 clarify, basically, the only thing, the only difference
10 between page 23 of your testimony and this page of the
11 outside activities in the Library Reference is that there is
12 apparently some fax, telecopier information at the top.

13 A Right. Some scanning information.

14 Q So that was obviously not on the bar code sheet.
15 Obviously, the text at the very top line was not there. But
16 other than that, this appears to be a replication of what
17 you show in Library Reference 221, is that correct?

18 A Correct.

19 Q Okay. Why don't you take a look on page 23, under
20 11.4 outside activities, there is a second column of
21 information there headed "Customer."

22 A Okay. Which set of documents am I in now?

23 Q Oh, I am sorry. This is page 23 of your
24 testimony.

25 A Okay. Yes, the one that has the arrow in it. Is

1 that the column you are referring to?

2 Q That's correct. There appears in that column to
3 be what looks like a handwritten or ruler written set of
4 dashed lines there, just above the category "Delay Specify
5 Detail," do you see that?

6 A Correct.

7 Q Did that dashed line appear in the bar codes as
8 used by the data collectors?

9 A To the best of your knowledge, Tom, this represents
10 a physical set of bar codes that was used, and that that
11 line on there, those break lines, and the same that you see
12 over on the far righthand side of the sheet, were just
13 visual assistances -- assistance to the people that were
14 doing the bar code scanning, and that in their books or sets
15 of bar codes that they had, those lines would be in there.

16 Q Okay. Now, in that, right next to the bar code
17 for "Delay Specify Detail," there is an arrow pointing
18 straight down. What is that arrow for?

19 A The arrow is to, in this particular case, this
20 came from a copy from an actual set that we took out of a
21 book that a data collector was using, that arrow is such
22 that if they use a delay specify, an F04, then the next set
23 that they would typically go to, that is where they would
24 scan, they would drop to the 11.41 level to scan, and they
25 would typically scan things that are related to the G column

1 that were down below that.

2 Q Oh, in other words, the arrow points straight
3 down, and what it is pointing straight down to is the delay
4 details, those one, two, three, four, five bar codes
5 directly beneath that, is that correct?

6 A Right. The G set of bar codes.

7 Q Okay. And the same with the far right dashed line
8 and arrow concerning other delay specify, the arrow points
9 down to the delay details right underneath that, is that
10 correct?

11 A Right. That subset.

12 Q Okay. Now then up there under outside work, next
13 to delivery/collect, there is also a dashed line, and this
14 time it has the word "details" written in and an arrow down
15 below. Does that likewise mean that when delivery/collect
16 is entered, you enter the delivery details below?

17 A Typically, one of the H codes that were located
18 below that, yes, in the 11.4.1 level.

19 MR. McLAUGHLIN: Mr. Chairman, give me a moment to
20 see what I can skip through here.

21 [Pause.]

22 BY MR. McLAUGHLIN:

23 Q We had some questions about the various activities
24 that the data collectors had to perform during the data
25 collection and I believe if you could return to your

1 response to Advo-47

2 Do you have that?

3 A Yes, I have just found 47, yes.

4 Q In part (c) you say that the typical work day for
5 data collection was 10 to 12 hours per day, do you see that?

6 A Correct.

7 Q Could you return to Advo Number 11?

8 A Yes, I found Advo Number 11.

9 Q Now here you describe at some length the many
10 items that the data collectors were doing when they were on
11 the street, and just for clarification it seemed to me there
12 were at least one or two other items that were not included
13 here that were apparently done.

14 I don't see any reference in this response to the
15 fact that while the data collectors were on the street they
16 also carried with them the Form 3999X for that route, is
17 that correct?

18 A I am almost to the end of my writeup.

19 It appears that in my response to 11 I did not
20 mention the 3999X.

21 Q And that is a form that the data collectors
22 carried with them and referred to as they were making
23 observations?

24 A Correct.

25 Q And they also made edits to that 3999 as well, is

1 that correct?

2 A They marked on it.

3 Q They made annotations on it.

4 A Annotations, correct.

5 Q Okay. Now you indicate there also, at the very
6 front of your response to Number 11, Advo-11, that the team
7 arrived a half an hour to an hour before the start of the
8 route. I believe you have also indicated that after the day
9 was over they would work in their hotel room going over a
10 number of activities, is that correct?

11 A Correct.

12 Q Typically how many hours would they spend after
13 the data collection was over reviewing the videotapes, their
14 notes, preparing reports, discussing on the phone with the
15 central database collectors.

16 What was the typical range of time they spent
17 doing those activities?

18 A Probably on the shy side, if the team had a really
19 good day and everything went real well, it would probably
20 take them somewhere in the neighborhood of half an hour to
21 an hour.

22 Q What was the typical time?

23 A I'd probably say somewhere around an hour and a
24 half, maybe two hours.

25 Q Okay. Now in looking over your response to

1 Advo-56, and I am not sure we have to really go through
2 it -- just kind of an observation -- there were it seems
3 like an awful lot of routes where the scanning process
4 itself covered nine, ten, eleven, even twelve hours
5 sometimes?

6 A That could happen.

7 Q So in those cases you are talking about a
8 half-hour to an hour beforehand plus maybe a couple hours
9 afterhand on top of that.

10 A And there were some bad days in there where there
11 was equipment or transmission problems like trying to get a
12 phone line, so things of that nature did happen on
13 occasions.

14 You will also notice in that response if they had
15 time that they typically worked a three-day shift, typically
16 would arrive, like one team would arrive and work a Sunday,
17 Monday, Tuesday or come in on Sunday and work a Monday,
18 Tuesday, Wednesday and the other group would come in and
19 work a Thursday, Friday, Saturday.

20 Q I would like to refer you now to your response to
21 Advo Interrogatory 19(c). This was a compelled response
22 that had been subject to a Postal Service objection.

23 [Pause.]

24 A Yes, I've found it.

25 Q Now, this one asks for copies of all requests,

1 proposals, instructions, and correspondence with the Postal
2 Service concerning the use of the ES data for purposes of
3 updating the street time survey.

4 When the Postal Service objected to this
5 interrogatory, they indicated that they had discovered that
6 they possessed very little documentary information
7 responsive to this request.

8 Is your answer that there is no documentary
9 information responsive to this request; that everything was
10 oral?

11 [Pause.]

12 A I would say that I received -- in looking at all
13 of this now, and looking at -- what I should have probably
14 said is, given a copy of a piece of paper that I had with
15 the six STS definitions on it that I received, that I
16 believe that I have submitted somewhere else, if I check and
17 say all correspondence. I probably should have resubmitted
18 that one or referred to that somewhere.

19 Q Okay.

20 A But as far as I know, the only piece of
21 information that I have relative to the Post Office is that
22 set of STS definitions.

23 Q Are you working under a contract with the Postal
24 Service to provide this testimony?

25 A I have a contract with Foster and Associates.

1 Q Is there a specific contract that deals with your
2 testimony here, the preparation of your testimony, that --
3 or is there a proposal of any sort related to that contract
4 for what you were supposed to be testifying to or doing with
5 respect to this testimony?

6 A I would say that the only thing that I'm aware of
7 is the information that I have with Baron and Associates.

8 Q Well, what do you mean, information you have with
9 Baron and Associates?

10 A I say, the contract that I have with -- that we
11 signed with -- not Baron -- with Foster and Associates.

12 Q Does that have any information about the scope of
13 the work to be performed?

14 A I believe -- I'd have to double-check the copy of
15 that, but I believe all it does is refer to Rate Case 2000,
16 but I'd prefer to take and have an opportunity to look at
17 that.

18 MR. McLAUGHLIN: Mr. Chairman, we would request
19 the witness to review what documents he may have with Foster
20 and Associates or whatever, to see if there are any
21 documents that might, in fact, be responsive to this.

22 We're not interested in what he's getting paid for
23 this testimony. And it may turn out that there's nothing
24 there of any interest, but this was something that was asked
25 very early on.

1 And we simply want to have provided, anything
2 that's relevant.

3 CHAIRMAN GLEIMAN: Gentlemen, you've added that to
4 your list?

5 THE WITNESS: Added that, added my Foster's
6 contract to the list.

7 CHAIRMAN GLEIMAN: Thank you.

8 BY MR. McLAUGHLIN:

9 Q Can you please turn to page 5 of your testimony?

10 A Yes.

11 Q At the very top there you're talking about the
12 objective of the Engineered Standards Project.

13 And a central or perhaps the central objective was
14 to develop engineered methods and time standards; is that
15 correct?

16 A Correct.

17 Q Okay. And so in developing all the different
18 information collection approaches, they were all geared in
19 one way or another toward trying to gather information you
20 thought you would be needing to develop time standards?

21 A And methods, time standards and methods, also the
22 work management system.

23 Q Now, I don't want to get into details of the time
24 standards. But isn't it correct that the time standards,
25 both as you envisioned them early on, and as ultimately

1 adopted, were time standards that -- there were different
2 time standards, for example, based on type of receptacle,
3 type of mail receptacle; is that correct?

4 A The type of mail receptacles were important in the
5 development of the standards, yes.

6 Q Right, you needed to have that information.

7 Likewise -- well, let's just look at page 5 of
8 your testimony, lines 11-13. You talk about several items.

9 You talk about type of mailbox. We just mentioned
10 that. That was -- you needed necessary information for that
11 to get -- to develop time standards.

12 Next item was number of obstacles and counters
13 such as doors and gates. Those were also -- that was also
14 information that was used in the time standards that were to
15 be developed, in creating the time standards and actually
16 implementing the time standards; is that correct?

17 A It was information that we desired to help in
18 developing the standards, right.

19 Q The next item, one- or two-handed delivery slots,
20 that's really a variation on type of mailbox, right?

21 A Yes.

22 Q Okay. And the degree of customer interaction, is
23 that something that you could categorize in the general
24 category of like a delay factor?

25 A No. That would be not just for delay factor, but

1 for other things as well.

2 Q Okay. But one thing you did need in developing
3 time standards was a delay factor to be plugged in
4 developing the time standards; is that correct?

5 A That's correct.

6 Q Can you turn to your response to Advo-92? Do you
7 have that?

8 A Yes, I just found 92.

9 Q At the very bottom of the first page of 92, and
10 over on the top of the next page, you state that the work
11 sampling data collected allowed for the application to
12 include a percent delay factor into the predetermined
13 system. Do you see that?

14 A Correct.

15 Q When you are referring to the work sampling data,
16 that is the work sampling data we have been discussing for
17 some time now, right?

18 A That's part of it.

19 Q Right. The percent delay factor was derived from
20 that work sampling data?

21 A From the work sampling data that is in -- that we
22 have. In addition to what you have seen, there is also the
23 inside work sampling data.

24 Q Right. Okay.

25 A So it is beyond the scope of what --

1 Q And, so, to that extent, --

2 THE REPORTER: It is beyond the scope of what?

3 THE WITNESS: It is beyond the scope of the data
4 that we have put in the street time access.

5 BY MR. McLAUGHLIN:

6 Q Well, to that extent, that information from the
7 work sample database was used as sort of a direct input into
8 developing the time standards, is that correct?

9 A That's correct.

10 Q Okay. Was there any other information that was
11 used as a direct input into the calculation and development
12 of the time standards?

13 A Let me just take a second to reflect. I think
14 information from the work sampling data was used indirectly
15 but not directly. I believe that would probably be the only
16 kind of hard number that was used.

17 Q Okay. Let me have you turn now to your response
18 to Advo Number 90. Let's see here, I have got to find a
19 good spot for you here. You have attached to that response,
20 I guess it is in part (d), you have a bunch of pages of
21 various bar codes and descriptions. I would like to have to
22 turn to, I guess it is second page of those descriptions,
23 down at the very last line, and then over on the third page.

24 A So we are on the 8.4 down at the bottom where we
25 have an outside task, clock outside, is that the line you

1 are referring to?

2 Q Right. Right. This section deals with time
3 studies that were done outside on the street, is that
4 correct?

5 A Now, 8.4 says inside task.

6 Q Well, excuse me, it has both inside tasks and then
7 down below, at the very bottom, it has outside tasks. Code
8 P00.

9 A It has -- this is a general listing, and it would
10 include both inside and outside codes.

11 Q I understand, but the -- well, let's just turn
12 over to the next page.

13 A Okay.

14 Q The very first code that appears there is P01, and
15 it says "Basic," do you see that?

16 A Correct.

17 Q Isn't that an outside time study?

18 A That would be a code that would be used in an
19 outside time study, I believe.

20 Q And, in fact, the term "Basic" means Basic
21 delivery, doesn't it?

22 A Yes.

23 Q As opposed to an accountable delivery or a
24 dismount delivery?

25 A Correct.

1 Q Okay. And, in fact, the description over there on
2 the far righthand side, it says "delivery of mail during
3 route," do you see that?

4 A Correct.

5 Q Okay. And on the next page there is a section
6 called "Counts for Delivery Type," do you see that?

7 A Correct.

8 Q These counts for delivery type are information
9 that would be recorded during one of the delivery time
10 studies, is that correct?

11 A Correct.

12 Q And, for example, during a basic delivery study,
13 for a period of time, the data collectors would be recording
14 number of paces in the basic delivery timing block, outside
15 on flat ground, for example. That is code DC02.

16 A Correct.

17 Q And they would be recording DC08, residential
18 delivery points served, and, for example, DC15, missed
19 delivery points.

20 A Correct.

21 Q Okay. So all of this information was being
22 collected during periods of time during which there were
23 time studies going on?

24 A Correct.

25 Q And these were at the same time that the work

1 samplings were going on as well, is that correct?

2 A Correct.

3 Q Okay.

4 A Now, Tom, time studies weren't necessarily being
5 done continuously throughout the work day.

6 Q I understand that. I understand that.

7 A There would be selected times during the day that
8 they would perform time studies.

9 Q Right. Right. No, I understand that.

10 A And a time study could cover multiply delivery
11 points.

12 Q Now, I noticed in the time study portion, is there
13 -- was it possible to collect receptable -- there is not
14 receptacle information here, is that right?

15 A That's correct.

16 Q Okay. The only source of receptacle information
17 was the work sampling?

18 A Correct.

19 MR. McLAUGHLIN: Mr. Chairman, I think I am at
20 that point where I could potentially go on for quite a while
21 on things like definitions and STS assignments but it seems
22 to me it is probably not a good use of all of our time since
23 we have many outstanding interrogatories that are
24 interrelated with the questions I would be asking, so I
25 think at this time that would conclude my cross

1 examination -- subject to the witness being recalled.

2 CHAIRMAN GLEIMAN: Thank you, Mr. McLaughlin.

3 Next we are going to hear from the Newspaper
4 Association of America, but we are going to take ten. We'll
5 come back at ten minutes after the hour.

6 [Recess.]

7 CHAIRMAN GLEIMAN: Mr. Baker, you may proceed
8 whenever you are ready.

9 CROSS EXAMINATION

10 BY MR. BAKER:

11 Q Good morning, Mr. Raymond. My name is Bill Baker
12 and I representing the Newspaper Association of America.

13 Like my colleague Mr. McLaughlin, I think there
14 are some questions that I might have asked today but I think
15 that I will await the response to the pending
16 interrogatories which cover much the same ground and we will
17 see what we are left with when they come in.

18 I would like to ask you a little bit about your
19 experience, which you summarized for us in NAA
20 Interrogatories to you, Numbers 3 and 4 -- not 3 so much. I
21 guess it was 4 and 5, excuse me.

22 Without -- you don't necessarily need to turn to
23 them yet -- I guess it was NAA-4 principally -- for how many
24 years have you been in the field of work measurement or data
25 collection?

1 Well, let me back up. Would you describe that as
2 the field that you are in, work management data collecting?

3 A I'd say more generally classified as the
4 industrial engineering profession.

5 Q So that is a subset of what industrial engineers
6 do?

7 A That would be a subset of what they do, yes.

8 Q And so developing time-based planning and
9 scheduling systems is a particular form of industrial
10 engineering?

11 A Yes, it is.

12 Q Are there lots of people in this field or is it
13 pretty specialized?

14 A I would say it is pretty specialized.

15 Q And what is unique about it or what makes it so
16 specialized?

17 A Well, we'd probably get back to the difference
18 between people that enjoy a Taylorism approach to management
19 styles versus what some people would call a more enlightened
20 approach to management styles -- that is, some companies
21 prefer to have their businesses based upon engineered
22 standards, principles, time and motion study, that sort of
23 factual information, and then there are a lot of other
24 organizations that prefer not to take that approach to their
25 management styles.

1 Q How long have you been in the field?

2 A Well, I am trying to think back. In my early days
3 as an apprentice, which goes back a long time, I had to
4 perform some time study activities back in those very early
5 days, so I would say 20-plus years, 25-plus years.

6 Q Could you now turn to your answer to NAA-5 and in
7 particular subpart (g).

8 A I'm sneaking up on it. Yes, I've found that,
9 Bill.

10 Q Here we had asked you a question about the quality
11 assurance checks that you had described at page 13 of your
12 testimony and asked if they were typical of projects of this
13 size, and your answer was that you instituted an above
14 average quality control process for this type and magnitude
15 of project.

16 You say what was done here went far beyond normal
17 data verification. I was wondering if you could elaborate.
18 What would a normal time study or a normal level of
19 verification have done differently?

20 If you had done a normal level of verification in
21 this study, what would have been different?

22 A The normal process is to rely upon the data
23 collectors as far as collecting the information and not --
24 maybe once in awhile do a spot check of what they have done,
25 so there would be relatively little in-the-field observation

1 working with what was going on with the data collection
2 people.

3 Q And is a reason that you did more in this case
4 because of the Postal Service's potential use of the results
5 of this in carrier network design or carrier assignments?

6 A I think that I felt in this case that the post
7 office definitely needed to have additional benefits of a
8 lot of quality control, checking process, that the dataset
9 would be used for a significant number of possible purposes
10 within the post offices and we wanted to do an above average
11 job in collecting all of the information.

12 Q Those purposes at the time you did the study at
13 least in your mind did not include a rate case purpose, did
14 it?

15 A No, it did not.

16 Q Those were for other purposes important to the
17 Postal Service?

18 A That is correct.

19 Q Now I want to change the subject a bit and ask you
20 a little bit about the data that your team collected and
21 that were eventually given to Witness Baron.

22 There is, I think there is a reference to
23 approximately 39,000 lines of data -- does that sound right?

24 A That sounds right.

25 Q Does that mean there were 39,000, roughly,

1 separate occasions where the six minute time wand beeped and
2 the observers recorded what was going on?

3 A For the outside field activities, yes, and for the
4 routes that were given in Baron's database.

5 Q Now in, I think it is in Library Reference-163
6 there are time entries to the hour, minute and second
7 associated with observations, is that correct?

8 A That's correct.

9 Q Can you tell me what that time indicates? In
10 particular, is that the time of the beep? Is it the time of
11 the first entry in that set of observations, or the time of
12 the last entry or somewhere in between?

13 A Every time that you make a pass with the bar code
14 scanner, and it records the bar code, the scanner makes an
15 imprint of the time that the actual bar code was scanned.

16 Q So, for each set of observations, we will have
17 many different?

18 A So, if I look at bar codes scanned for a Level 10,
19 and let's say it was done at exactly 2:00 in the afternoon,
20 and then I were to look at when the next level was scanned
21 in, there is a possibility, except in rare occurrences where
22 we may have done some editing of the data, it should
23 identify when that exact scan was made.

24 Q Okay, thank you.

25 [Pause.]

1 I want to next turn to a subject that interested
2 me yesterday with Mr. Baron, and I think has been covered a
3 little bit. And it has to do with the number of route days.

4 And if you could turn to your testimony at page 14
5 where you stated that -- I believe you said 180 -- excuse
6 me, 844 route days of street information were collected
7 through the one-day and multiple-day studies; is that
8 correct?

9 A I think I'm almost getting this memorized. Yes,
10 on page 14, 844 route days.

11 Q And there is also a number, 861 floating around;
12 isn't there?

13 A Yes, there is. That's what Don referred to
14 yesterday, I believe, in his testimony; that he had 861
15 route days.

16 CHAIRMAN GLEIMAN: Excuse me, you mean Witness
17 Baron?

18 THE WITNESS: Excuse me, Witness Baron, yes.

19 CHAIRMAN GLEIMAN: Okay, I just wasn't sure we had
20 anybody up here named Don yesterday.

21 THE WITNESS: Sorry.

22 CHAIRMAN GLEIMAN: Are you looking for some more
23 things on your side there?

24 MR. BAKER: I have a great many documents here
25 that I am shuffling, but I think I am finding the one I

1 want. Just a moment, indulge me a second, Mr. Chairman.

2 [Pause.]

3 BY MR. BAKER:

4 Q Could you also briefly turn to Advo-66, which I
5 believe you discussed yesterday afternoon?

6 [Pause.]

7 Do you have that?

8 A Yes, I do.

9 Q Okay. Did you amend, by the way, the answer to
10 this one at the beginning of your testimony? In the second
11 line, is the 845, 845 or 844?

12 A That should be -- I think you found another
13 discrepancy. I believe that should be 844.

14 Q All right. I wasn't sure if that was one of the
15 errata you made at the beginning of your testimony.

16 A No.

17 Q Okay. And accepting -- and the difference in A,
18 you noted there are 16 sets of undated tallies in the
19 Library Reference 163, which, except for that change to the
20 844 from 845, would account for the difference between the
21 861 and the smaller number; is that correct?

22 A That's correct.

23 Q Okay.

24 MR. BAKER: Mr. Chairman, at this point, I'd like
25 to approach the witness and show him a document.

1 BY MR. BAKER:

2 Q Mr. Raymond, I have shown you a document that we
3 prepared, trying to figure out the difference between the
4 861 and the smaller number, and it is labeled -- I notice we
5 have a typo in it, but it should be identification of route
6 days for undated tallies.

7 And just across, you see that we have a unit code
8 and a route number, and corresponding with that, we have our
9 count of the undated tallies associated with that unit code
10 and route number that appear in Library Reference 163.

11 And we have added -- have a column there of the
12 date associated with that unit code and route and tallies
13 that were identified in this response here, Advo-66. Do you
14 see that?

15 A Yes, I see that.

16 Q And in the right column, we have indicated the
17 number of dated tallies for the same unit code and routes
18 that does appear in Library Reference 163; do you see that?

19 A Okay, I see that.

20 Q Have you had a chance to -- I did share this with
21 counsel ahead of time, and I wonder if you've had a chance
22 to see if we counted the numbers correctly or had the right
23 number of tallies for each of those categories?

24 A I'd like to reserve the right to cross-check
25 everything, but I think you've probably come very close to

1 what it ought to be, if not have it right on.

2 Q Okay, so --

3 A And, likewise, last night, my associate and I were
4 cross-checking the file, and again this morning on the same
5 issue.

6 Q Thank you. Now, I notice that in this document --

7

8 MR. BAKER: I suppose I will at least mark for
9 identification as NAA Cross Examination Exhibit 1.

10 [Exhibit Number NAA-XE-1 was marked
11 for identification.]

12 BY MR. BAKER:

13 Q It shows that in routes, there are 16 different
14 routes there; is that correct?

15 [Pause.]

16 Sixteen unique routes.

17 A Sixteen unique routes, yes.

18 Q And these are associated with the 44 undated
19 tallies; is that correct?

20 A Correct.

21 Q And do you recall how many tallies had dates, how
22 many route days were associated with the tallies that were
23 dated?

24 A Well, if I go to my original testimony, I believe
25 that there are 844.

1 Q Okay. Now, in Advo-66, you provided the times and
2 dates associated with these undated -- 16 undated routes; is
3 that correct?

4 A That's correct.

5 Q And if we -- let's just take the first one in
6 Advo-66. It's CY4, Route 4234 and so forth, a date, August
7 25th of 1997; do you see that?

8 A Correct.

9 Q And, in fact, are not all of the routes for 4234
10 from that date?

11 A Correct.

12 Q And if we move one column over, we will see the
13 time at which these observations were made; is that correct?

14 A Right.

15 Q If you just look at this Route 4234, do these
16 times appear to be scattered throughout the day, or are the
17 in a particular window of time?

18 A I think if we had run these in chronological
19 sequence here, they're run by the STS category. I'm hoping
20 that they fall in chronological sequence, approximately
21 every six minutes apart.

22 Q Do you have Library Reference 163 with you?

23 A 163 or --

24 Q Six-three.

25 A The actual electronic file or just a reference

1 document?

2 Q Well, the one you would need to answer the
3 following question.

4 A Well, let's see what the question is.

5 Q Okay. All right. I noticed that back in Advo-66,
6 the first time entry for this route, 4234, appears to be at
7 1:16 in the afternoon.

8 A Okay.

9 Q And I was wondering if you could confirm that for
10 the same route and day, in Library Reference 163, you show
11 tallies from 10:59 a.m. to 1:11 p.m., and then again
12 starting at 2:56 p.m. to 5:21 p.m. Do you have information
13 with you that could allow you to confirm that?

14 MR. COOPER: Mr. Chairman, I think we can confirm
15 that during a break.

16 MR. BAKER: Okay.

17 THE WITNESS: I believe that you will see a gap in
18 there, Tom, that will -- excuse me, Bill.

19 BY MR. BAKER:

20 Q All right. So, what I would like to ask you,
21 perhaps to confirm at the break, if you reviewed all of the
22 undated tallies that I have provided on the document I have
23 marked as NAA Cross-Examination Exhibit 1, that each of
24 them, if you will, supplements one of the route day
25 combinations that already -- previously, in the group of 844

1 that were already dated? Do you understand?

2 A Yes. Yes.

3 Q Okay.

4 A Okay. I believe that they should all find their
5 nice little slot that fits right in there to a gap in the
6 time sequence on the existing records.

7 Q Put differently, then if that is true, then when
8 we add in the undated tallies to the 844, we still have 844
9 route days?

10 A That is what we should have is 844 route days.

11 MR. BAKER: Excuse me a moment, Mr. Chairman.

12 [Pause.]

13 BY MR. BAKER:

14 Q And while you are confirming in 163, I have one
15 more for you. There is still a possible discrepancy between
16 844 and 845 route days, as we have seen both numbers, is
17 that correct? I would ask you, when you check, if you could
18 examine the tallies for CY 35, route 6742, for December 9th
19 and 10th of 1996. Do you have that date?

20 A I am making a note, the 9th and the 10th, yes.

21 Q And our review of that data indicates that there
22 were 19 tallies on December 9th, beginning at 10:13 a.m.,
23 going to 11:56 a.m. We further observe 49 tallies reported
24 for December 10th that start at 12:02 p.m. And the question
25 for you is whether the two fractional days and the six

1 minute gap in between suggest that the same route day was
2 involved, but there is an incorrect date somewhere? Could
3 you verify that?

4 A We will verify that.

5 MR. BAKER: Mr. Chairman, I suppose I should mark
6 for the record two copies of this cross-examination exhibit.
7 I believe that all of the data in it are already part of the
8 record, and, so, I believe then it would merely need to be
9 marked for identification for convenience and placed in the
10 record in that manner.

11 CHAIRMAN GLEIMAN: Well, if you would mark it as
12 you had indicated previously, and provide two copies to the
13 reporter, I will ask that the reporter transcribe that
14 material into the record.

15 [Cross-Examination Exhibit No.
16 NAA-X-EX1 was transcribed into the
17 record.]

18
19
20
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NAA X-EX 1

Identification of Route-Days for Undated Tallies

UnitCode	Route	Undated Tallies in ES Data (LR-I-163)	Date Identified in Response to ADVO/USPS-T13-66	Dated Tallies in ES Data (LR-I-163)
CY04	4234	11	8/25/97	41
CY04	4243	1	7/10/97	43
CY04	4254	5	8/26/97	42
CY46	1133	1	5/24/97	41
CY47	1475	1	7/22/97	60
CY47	1508	1	6/23/97	58
CY47	1508	1	6/25/97	54
CY50	8717	3	5/16/97	43
CY50	8717	5	5/17/97	39
CY50	8735	1	7/10/97	40
CY50	8735	1	7/11/97	41
CY55	1606	1	6/13/97	44
CY57	3707	1	7/8/97	39
CY57	3707	1	7/9/97	42
CY57	3716	3	7/1/97	29
CY58	8212	1	7/15/97	45
CY58	8218	1	7/21/97	56
CY58	8218	1	7/22/97	50
CY59	0320	1	7/28/97	55
CY64	1401	2	8/12/97	55
CY64	1457	1	8/19/97	47

1 BY MR. BAKER:

2 Q Now, Mr. Raymond, I would now like to turn to a
3 different matter. Late yesterday, you were asked a series
4 of questions that asked you to compare the spreadsheet that
5 you had provided in response to Advo-23 with your data you
6 provided in response to Advo-61. Do you recall that
7 discussion?

8 A Yes, I recall that discussion.

9 Q And, as I recall, you indicated that there was a
10 difference in the source of the piece data between these two
11 documents, is that correct?

12 A That's correct.

13 Q And could you repeat for me, what was the source
14 for the Advo-23 response?

15 A That is what we had in our electronic data base at
16 the point in time that we created the files that were
17 submitted in 23, and those were different, depending on
18 which file we were looking at, or spreadsheet we were
19 looking at. In that Library Reference there are a number of
20 ones at different dates.

21 Q All right. And the data you compiled in response
22 to Advo-61 came from a different source?

23 A I believe that is the one that we went through all
24 of the manual records to reconfirm and reassess that all of
25 the quantities were correct.

1 Q Those were the 3999X forms?

2 A The 3999Xs.

3 Q And, at least in theory, these would be separate
4 data sources for the same mail?

5 A Let's just say that we felt that it was important
6 to go back through and confirm that what we had for a
7 response to Number 61 is what the actual records were that
8 were coming off from the manual records that had been
9 written down.

10 Q Right. But the manual records and the electronic
11 records were from the same deliveries, on the same days?

12 A Right. Same day, same time, same place, correct.

13 Q Yesterday you were shown a document, and I don't
14 recall whether it was marked as a cross examination exhibit
15 that was prepared by counsel or provided to you by counsel
16 for Advo, that summarized the volumes from the Advo-23
17 response. Do you remember that?

18 A I recall.

19 Q Yes, okay, and you were asked a series of
20 questions, asked to compare the average letter and volumes
21 shown there with the average letter and flat volumes shown
22 in your response to Advo-61, were you not?

23 A That is correct.

24 Q And if you look at Advo-61, page 18, if you could
25 turn to that --

1 A Yes, I have that.

2 Q -- just to refresh where we were, at the bottom of
3 page 18 there is an average for letters which is 555, is
4 that correct?

5 A That is what it says on that form, yes.

6 Q And that was compared -- and this is the
7 management selected route, right?

8 A Correct.

9 Q And the volume for flats was 759?

10 A That's correct.

11 Q Average.

12 A Average.

13 Q That is an average piece?

14 A Correct.

15 Q And if you could look at the document that you
16 were cross examined on yesterday, I see for management
17 selected routes the average letters were 737 and flats were
18 541?

19 A Correct.

20 Q I noticed that the 541 for flats generated by the
21 spreadsheet given in response to Advo-23 is not far for the
22 average number of letters produced in your column of Advo-61
23 and I was wondering whether it is possible that some figures
24 were transposed in one place or the other.

25 A This is another one that we were researching last

1 night and I believe that we have made a mistake, that the
2 column headers that are on 18, that represents the 18 pages
3 in 61 that letters and flats were inadvertently switched.

4 Q So that means that the spreadsheet, Advo-23, would
5 be the correct numbers?

6 A That is correct.

7 Q And the attachment to 61 would be corrected --

8 A Needs to be corrected, letters.

9 Q -- to switch the flats and the letters.

10 A Correct.

11 Q And that goes for the random selected routes too,
12 wouldn't it?

13 A I believe so, yes.

14 Q Let me move to a different subject.

15 I believe there was some discussion yesterday, and
16 I don't recall which witness, that had to do with carriers
17 spending time at a residence visiting, checking on people.

18 I don't recall if that was during cross
19 examination of you or Witness Baron. Do you -- do you
20 recall whether that was of you?

21 A No, that was of Witness Baron.

22 Q Is that what you would consider hardship, the
23 tally takers?

24 A Yes, that's definitely in the hardship area.

25 Q Do you know how many hardship tallies were

1 recorded in the material in Library Reference 163?

2 A My curiosity was raised yesterday when that
3 question came up and the discussion relative to that, and I
4 believe that there are 10 tallies out of about the 39,000
5 that deal with hardship and that in the way that the bar
6 codes are scanned there is also some additional identifying
7 information there, Bill, that might be of interest, that you
8 might want to take a look at some time, because we would
9 identify whether they were for, say, public relations
10 purposes or if it was actually a mail drop was made, and I
11 believe that there are a couple of the records, maybe one or
12 two records that out of the hardship where actually mail was
13 delivered at the time that there was that, out of those ten
14 an actual interaction with a customer delivering mail.

15 Q Okay. Finally, I think I would like you to
16 clarify -- I hope clarify something I am just lost on.

17 If you could turn to Advo-63 and particularly
18 subpart (5) there was some discussion on this yesterday.
19 Could you review for me what are the correct numbers here in
20 the table?

21 A Okay. The top row states that in Phase 1 there
22 were 40 total observed sites, in Phase 2 there were 21 new
23 ones, and then we have in Phase 2 some overlap so that if I
24 were to add the 40 and the 21 together I should subtract out
25 the fact that these other sites were already included in the

1 numbers 40 and 21, so that should come to a total of 59
2 sites were observed, so it should be 59 is the correct
3 number in the upper right-hand corner and then if I drop
4 down to the next row that I was questioned on it is the 31
5 and the 19 and the 2, and there is a mistake. The 42 that
6 is in there should really not be a 42.

7 Q What should it be?

8 A It should be 48.

9 Q Okay, so what that suggests then, the error is
10 actually in the second column where it says "Phase 2 New" --
11 because they weren't all really new?

12 A Well, yes they -- in other words there was one
13 random site that we did not observe in Phase 1 but we
14 observed in Phase 2 and therefore that is why there is a
15 little bit of confusion there. I think that adds to the
16 confusion.

17 Q So on the right column the totals are, correct
18 totals now are 59, 11, 48?

19 A 48, correct, so that if I add the 11 and 48
20 together I get 59.

21 Q Oh, the 11 and the 48 sum to the -- okay.

22 A To the 59, so there were 59 sites that were
23 observed and i think up there in the very top sentence on
24 that, if we look at that it says total number of CY codes is
25 59. There were 40 sites in Phase 1 plus the 21 sites in

1 Phase 2 minus the two sites that were observed in both
2 phases.

3 Q What is confusing to me then is the phrase, the
4 word "new" in the table at the bottom.

5 A Okay.

6 Q I am just suggesting that they would be improved
7 if the word, new, were not there?

8 A Yes, that will probably be of assistance in this
9 table.

10 Q You were asked a question about the bar codes,
11 and, in particular, the dates on the bottom of your
12 appendices.

13 Are the bar codes that you attach in Appendix C to
14 your testimony -- is this on a spreadsheet?

15 A Are they on a spreadsheet?

16 Q Yes.

17 A No, they are -- the way that these bar codes are
18 made up, we use a software program, Labels Unlimited, to
19 take and print the actual bar code itself, and then they are
20 hand-pasted to a sheet.

21 Q Maybe we misunderstand. If you could just turn to
22 Appendix C, the first page, of your testimony?

23 A Okay. The first page of bar codes, I have that,
24 yes.

25 Q And at the bottom do you see a row that says date,

1 bar code XLS and a time?

2 A Correct.

3 Q That's why I thought this was on a spreadsheet.

4 Can you explain what that bottom row is?

5 A We used Excel like a wordprocessor in this case,
6 and just made up a blank page that would be appropriate for
7 fitting the bar codes on it, where we would put the lines on
8 it, instead of using like a Word or a WordPerfect.

9 Q Do you happen to know whether the Excel program
10 that -- is it Excel?

11 A Yes.

12 Q Do you happen to know if that program you used,
13 automatically generates the date and time when you print the
14 spreadsheet?

15 A It appeared in this case that that was what was
16 put on this particular sheet, was the date and time that it
17 was printed.

18 Q And that -- but not May -- is that different from
19 the date on which the spreadsheet was created or a change is
20 made?

21 A Let's say that, yes, that could very well be, that
22 we printed up a master sheet.

23 Q And so if you had printed something on October
24 6th, 1996, as this page apparently was, it could have been
25 created at an earlier date and time?

1 A Yes, it could.

2 Q Okay. All right, and finally, could you turn to
3 your answer to MPA-56?

4 A MPA-56, yes.

5 Q In the attachment to this, you present total time
6 recorded for your -- this is your people or is this the
7 carriers? This is your people.

8 A This is when the data collector started scanning
9 the carrier, so this would be for the carrier's day. This
10 isn't the hours that the observer worked, but this is what
11 the carrier was working off, or the particular route that we
12 were studying.

13 Q This is the carrier's time?

14 A That's the route time.

15 Q Route time, carrier's route time. And so any
16 additional time that your staff spent reviewing the day's
17 work would not be reflected on this sheet; is that correct?

18 A That's correct.

19 Q All right. We have attempted to review the total
20 hours shown here, and we have identified about 12 route days
21 in which the total carrier's time was in excess of 12 hours.

22 Is that -- would you -- does that sound like about
23 the right number for you, or have you had a chance to look
24 at that?

25 A I haven't looked at it that way, but I'm quickly

1 scanning the record, the pages here, and that seems
2 reasonable.

3 Q And as you were scanning -- perhaps it's easier to
4 notice that there are a great many entries for which the
5 carrier's time reported here is under 10 hours; is that
6 correct?

7 A That's correct, there's --

8 Q Okay. And this, again, this is MPA-56, covering
9 the 844 route days?

10 A I didn't add those up, but it could be more.

11 Q At least close?

12 A At least the 844 route days are in here.

13 Q At least?

14 A At least.

15 Q Could there be more? What else would there be?

16 A It says as to each route day, so, once again, I
17 haven't checked to see how many total route days are in this
18 document, but I know at least the 844.

19 Q There are at least 844?

20 A At least 844, and possibly more.

21 Q All right, and then -- okay.

22 MR. BAKER: I have no more questions, Mr.

23 Chairman.

24 CHAIRMAN GLEIMAN: Mr. Costich?

25 MR. COSTICH: No questions, Mr. Chairman.

1 CHAIRMAN GLEIMAN: Periodicals Mailers group, Ms.
2 Noble?

3 MS. NOBLE: Periodicals Mailers have no questions.

4 CHAIRMAN GLEIMAN: Thank you. Mr. McKeever.

5 MR. McKEEVER: Thank you, Mr. Chairman.

6 CROSS-EXAMINATION

7 BY MR. McKEEVER:

8 Q Mr. Raymond, my name is John McKeever for United
9 Parcel Service. Could you turn to your response to
10 interrogatory UPS/USPS-T-11-25, please? That was redirected
11 to you from Mr. Meehan -- from Ms. Meehan, excuse me.

12 A Yes, I have found that.

13 Q Now, in your response to Section B-C, you state,
14 in the last sentence of that particular paragraph, "Priority
15 and Express Mail are sorted in the office, not in the
16 vehicle." Do you see that?

17 A Correct.

18 Q And earlier in that same response, you indicate,
19 "Typically, the carrier cases these products with the other
20 cased mail in delivery sequence." Do you see that?

21 A Correct.

22 Q Suppose you have an instance where the Priority
23 Mail or the Express Mail item is really a parcel that does
24 not fit within a case, whether it be a letter or a flat
25 case, is it still sorted in the office, do you know?

1 A Depending on the size or shape of the parcel, it
2 would not be sorted into the case, it would usually just be
3 picked up and put in the hamper along with the other
4 products.

5 Q And it would be treated like other parcels then?

6 A Yes.

7 Q Okay. Now, if you can turn to your response to
8 paragraph (f) of that interrogatory, please.

9 A Yes.

10 Q That question asked you, if you look at the
11 question, there were two questions, and the second was, does
12 the carrier sort the parcels for the route in the carrier
13 station or in the vehicle? Do you see that in the question?

14 A Yes.

15 Q Okay. And the last sentence of your answer says,
16 "Typically, due to the small number, the carrier does not
17 sort parcels." Do you see that?

18 A Yes.

19 Q Now, could you turn to your response to paragraph
20 (g), please? There you state, "During the vehicle loading
21 process, the carrier places the parcels in the vehicle in
22 route zone groupings." Do you see that?

23 A Yes.

24 Q What is a route zone grouping?

25 A It is a general location in the vehicle where the

1 carrier is looking at it, then the carrier will place the
2 first part of his parcels on delivery near the back of the
3 vehicle, and the later parcels will be towards the rear of
4 the vehicle -- or further up into the vehicle.

5 Q So the carrier uses a method of organizing the
6 parcels in terms of when on the route they will be
7 delivered?

8 A In a general kind of way, John. I used the word,
9 it is kind of -- it is almost kind of a gross kind of way,
10 but they will just put them kind of front to back, whatever.

11 Q Would the term sequencing accurately describe the
12 process, sequencing the parcels?

13 A I am not sure I want to get that finite in it.

14 Q Okay.

15 A It is just kind of a very kind of way.

16 Q But the does organize them in some way?

17 A To help jog his mind, yeah.

18 Q Okay. Now, I would like to just walk through with
19 you the process of loading the parcels at the vehicle, if I
20 may. I take it that first the carrier would pick up the
21 parcel from the hamper, is that correct?

22 A That's correct.

23 Q Then he would take a look at the address label to
24 determine what route zone grouping to put it in?

25 A He usually takes at the label, does some

1 orientation on the parcel to try to get it top side up or
2 label side up.

3 Okay. And in that rotating of the parcel that is
4 in the hamper, he will scan what it is to give him a general
5 feel for what it is, yeah.

6 Q And to give him a general feel for where he should
7 put it in the vehicle?

8 A He is looking at the size and the shape and that
9 sort of thing.

10 Q Okay. Now, can you tell me if that activity is
11 captured in street support, is that a street support time
12 activity?

13 A Yes.

14 Q Now, also, in your response to subparagraph (g),
15 you state, in the last sentence, "As each parcel is
16 collected for delivery, the next parcel is checked to
17 determine its delivery address, and this process continues
18 until all parcels are delivered." is that correct?

19 A That's correct.

20 Q Is that activity also captured in street support
21 time?

22 A I am trying to think, in some instances, if he is
23 involved with a major set-up of the vehicle, it would be in
24 street support. In some cases the parcels are of such a
25 nature that he has the parcel with him in the front of the

1 vehicle, so when he accesses the vehicle the parcel is with
2 him, and in that particular case it might not be as part of
3 street support.

4 Q What would it be then?

5 A If it was a -- I am trying to think of an
6 incidence where, let's say the situation is one where, on a
7 curbside route, are you familiar with like what a Number 2
8 size rural delivery box is?

9 Q Yes.

10 A Large enough so that in some cases parcels would
11 fit into that.

12 Q Yes.

13 A So if that carrier had pulled up on a curbside
14 delivery route and that carrier had a parcel and had that
15 parcel located in the front of the vehicle, I believe
16 yesterday someone described the actions that the carrier was
17 going through when a vehicle was stopped, that is, obtaining
18 the mail to take and put into the receptacle. If that
19 parcel was right there with the rest of the mail, then that
20 would not have gone into street support, because he would
21 have been obtaining the mail to take and put into the
22 receptacle so the parcel would have gone right along with
23 the regular mail. That would be an example of where it
24 would not be in street support, where it would have gone
25 into a load time situation.

1 Q Okay. You answered my question, that would be
2 load time.

3 A Yeah.

4 Q And that would be typically for a smaller parcel,
5 is that correct?

6 A Whatever the customer has out there for that site,
7 one that would fit into their particular receptacle.

8 MR. McKEEVER: Okay. That's all we have, Mr.
9 Chairman.

10 CHAIRMAN GLEIMAN: I am just so stunned that we
11 are moving so fast all of a sudden. Is there any follow-up?
12 Mr. McLaughlin, I know we are going to keep moving right
13 along here.

14 MR. McLAUGHLIN: I don't intend to take too long
15 here. It is not my intention.

16 FURTHER CROSS EXAMINATION

17 BY MR. McLAUGHLIN:

18 Q Mr. Baker asked you some questions about Advo-63,
19 part 5 and the table there.

20 A Yes.

21 Q 59 versus 61 CY codes. Do you recall yesterday I
22 asked you about two CY codes that appeared in response to
23 Advo Interrogatory 9 and Advo Interrogatory 7 that we had
24 been unable to find in LR-163.

25 A I am going from recollection, without looking at

1 it. Was that like 31 and 65?

2 Q I believe it is 31 and 65.

3 A 31 and 65, okay. I did some research on that one
4 between last night and today as well. It appears that we
5 used bar code number 65 to perform a completely separate
6 study and yet we used the bar code scanning to collect some
7 information on that. The study was to look at bike routes
8 or bicycle supported carrier routes so that takes care of
9 65? Any questions on that one, Tom?

10 Q Well -- yes, I may. I am not sure I have any at
11 the moment.

12 [Laughter.]

13 MR. McLAUGHLIN: I don't have a question at the
14 moment. Obviously you will be reappearing and in the
15 meantime we may have questions.

16 BY MR. McLAUGHLIN:

17 Q But how about on CY-31?

18 A In CY-31 we had a situation where we were going to
19 what we thought was a physical location that we believe
20 would take three separate CY codes to handle the physical
21 sites that we doing there and when we found out that the zip
22 codes that we were going to be studying were all located in
23 one physical facility so instead of using the three CY codes
24 for that we only used two out of the three to collect the
25 information and therefore we never did collect any data

1 under the CY Code 31. They just did not end up getting
2 used.

3 Q Well, what were the CY codes under which it was
4 collected?

5 A CY Code 29 and CY Code 31 were used.

6 Q Is there any problem in identifying the names
7 associated with those CY codes or is that confidential?

8 A I believe I am --

9 MR. COOPER: Well, the reason we coded them to
10 begin with was to keep the regional and the geographically
11 specific information confidential.

12 MR. McLAUGHLIN: Just give me one minute here.

13 [Pause.]

14 MR. McLAUGHLIN: There again, Mr. Chairman, we
15 might on reflection have some questions, further questions
16 on that, but I can't think of any at hand.

17 CHAIRMAN GLEIMAN: Does that mean you are finished
18 with your follow-up?

19 MR. McLAUGHLIN: That's correct.

20 CHAIRMAN GLEIMAN: Is there any other follow-up?
21 If not, questions from the bench?

22 COMMISSIONER OMAS: Yes, Mr. Chairman.

23 CHAIRMAN GLEIMAN: Commissioner LeBlanc can go
24 first --

25 COMMISSIONER OMAS: Oh, I'm sorry.

1 CHAIRMAN GLEIMAN: -- and then we'll go up and
2 down the line here.

3 COMMISSIONER LeBLANC: Maybe you could clarify
4 something for me, Mr. Raymond, if you will.

5 From the data in your engineering study can you
6 estimate the percentage of mail volume by accountables,
7 flats if you will, and letter and parcel shapes?

8 THE WITNESS: We're saying, if I can rephrase your
9 question, in a typical day what percentage of the different
10 types of mail that a carrier would be taking out would be
11 letters, flats, accountables, parcels, that sort of thing?

12 COMMISSIONER LeBLANC: That's correct, and does it
13 reflect that over a period of time as well, or does it
14 change, and if it changes do you have that?

15 THE WITNESS: Yes. We have lots of information
16 relative to what happened throughout our study --

17 COMMISSIONER LeBLANC: My point is in response to
18 what you just said, yes, I am interested in a daily basis,
19 that's correct, but also does it change, and if it changes
20 did you keep track of that?

21 Did you track the changes?

22 THE WITNESS: On the multiple day studies that we
23 did?

24 COMMISSIONER LeBLANC: Yes, sir.

25 THE WITNESS: Yes, we did keep track of the volume

1 that happened on those multiple day studies.

2 COMMISSIONER LeBLANC: Well, do you have it
3 available to you now or do you want to make that a homework
4 assignment to add, among many others?

5 THE WITNESS: I would say it would probably be
6 easier to make that a homework assignment, but I do not have
7 that summarized in the particular manner that you are
8 speaking.

9 The raw data is here but it would not be
10 summarized.

11 COMMISSIONER LeBLANC: Can you tell me then,
12 possibly off the top of your head, are the results
13 consistent with the results from the city carrier cost
14 system samples?

15 THE WITNESS: I have not checked any other data or
16 done any other comparative analysis, only with the data that
17 we have collected.

18 COMMISSIONER LeBLANC: So there would be no way to
19 check that then, to see if they are consistent with the city
20 carrier cost system, as far as what you did?

21 THE WITNESS: There might be a way of checking
22 that. I wouldn't know right now. Like I say, we have
23 information on what we collected here as part of this and
24 there is also additional information that was not included
25 in the Reference Library information that we have where we

1 counted information on routes by individual delivery point
2 and have information on that as well.

3 COMMISSIONER LeBLANC: Could you check that for us
4 and then get back with us, please?

5 THE WITNESS: Sure.

6 COMMISSIONER LeBLANC: Make that a part of your
7 homework assignment.

8 THE WITNESS: Okay.

9 COMMISSIONER LeBLANC: Yes, please. I think that
10 is enough. Thank you, sir.

11 CHAIRMAN GLEIMAN: Commissioner Omas.

12 COMMISSIONER OMAS: Mr. Raymond, in your answer to
13 UPS/USPS-T11-25, you describe the various kinds of mail that
14 a carrier keeps separate when he goes out on the street.

15 You describe him as sorting letters to delivery
16 point sequence, then flats to delivery point sequence,
17 putting them into a hamper, putting parcels into a hamper,
18 and then trays of DPS letters received from clerks on top of
19 that, and then loading these various kinds of mail into the
20 truck for delivery.

21 You also mentioned that the carrier keeps
22 jackpotted mail and mail that will receive centralized
23 delivery separate from other mail.

24 Could you please list for us all the distinct
25 kinds of mail that the carrier typically keeps separate

1 bundles or trays when he delivers mail on the street and how
2 he reintegrates them when he delivers the mail?

3 THE WITNESS: I'll give you a typical situation.
4 Let's pick a typical Tuesday where he may have his detached
5 label mail, to get to kind of the most complex day that a
6 carrier may face. Would that be of assistance to you if I
7 walked through that in a general kind of way?

8 COMMISSIONER OMAS: Okay.

9 THE WITNESS: Typically on the inside the carrier
10 would case his letters and detached label product into a
11 letter case. If that carrier happened to have some complex
12 apartment buildings where that carrier felt it was easier to
13 do what we call a "jackpotting" -- that is, instead of
14 having a vertical slot to put the mail in, the carrier would
15 just have a wide spot in his case he would put all the
16 letters and the detached label for that particular central
17 into a large area in the letter case.

18 Can you kind of envision that part so far?

19 COMMISSIONER OMAS: Yes.

20 THE WITNESS: And then in the flat case the
21 carrier would take his various periodicals and other things
22 that were defined as flats and he would put them into
23 vertical slots.

24 When he got to that same apartment complex the
25 carrier would take and put all of the so-called flats into

1 that same sort of jackpotting, a large section of the case
2 that would be available to do that.

3 That would take care of the letters and flats
4 inside the facility. As the day progresses, the priority
5 products, the Express Mail and the Priority Mail, in many
6 stations there is a roving accountable person that would
7 bring those products to that particular workstation and the
8 carrier would receive them and sign a form and review and
9 make sure that he's received the appropriate items.

10 If the carrier is aware of the size and the shape
11 if those are indeed caseable items and the carrier feels
12 comfortable, the carrier will place those, and typically
13 they will go in the flat case with the respective areas
14 where they are going to be delivered. If they are a larger
15 item that he may have received or the accountable person may
16 say come and see me in the cage to get like something that
17 would be defined as a parcel, then that particular product
18 may not be delivered at exactly that particular point in
19 time but the carrier would be aware of it.

20 As the carrier gets ready to do the pulldown
21 process, typically the carriers will then pull the letters
22 and flats down and create a tray of case letters and trays
23 of case flats.

24 And when he gets to the point where it's been one
25 of these jackpotting areas, the carrier will place all the

1 jackpotted letters into a tub instead of a tray.

2 And the carrier will do the same for the
3 jackpotted flats; they will be placed into a tub for that
4 particular central delivery point.

5 The carrier would then also have in his work area,
6 the -- had discussion with the supervisor, and for the
7 detached label product, be aware of whether he's taking out
8 half of the product on Tuesday, and maybe reserve half of
9 Wednesday, or the carrier may, if it's a lighter day, take
10 all of the detached label product that requires the marriage
11 mail piece out with it, may have cased all of those
12 particular items.

13 So those will be stacked in those immediate area,
14 the flat portion that would go along with that.

15 As we're approaching the tail end and the carrier
16 is now making up his trays, at some convenient time the
17 carrier will then proceed to getting the hamper that would
18 have the parcels in it. There may be some small pieces that
19 are in there, that the carrier would look at them.

20 It might be things like CD disks or things of that
21 size, and when the carrier would bring the hamper, those
22 items may be cased into the flats, or they may be
23 hand-integrated in, or kept as like samples in a separate
24 area.

25 The carrier now looks at what he's got in the

1 hamper, and typically the number of parcels that are in the
2 hamper are such that the carrier won't perform any activity.
3 The carrier will then start placing the trays and tubs
4 inside the hamper.

5 On the way out of the facility, towards the back
6 dock area, the carrier will stop and pick up the trays at
7 DPS. Now, are we comfortable so far with what's happened on
8 the inside?

9 COMMISSIONER OMAS: Yes.

10 THE WITNESS: If the carrier was a foot walkout
11 route, of which there is relatively few of those, during
12 that pulldown process, instead of integrating everything
13 into the trays, the carrier will make up sacks of mail that
14 will then be marked with the appropriate relays so that
15 someone else can take them to the relay box.

16 The carrier will also fill up his satchel, that
17 is, his very first, if it's going to be a park and loop type
18 activity, the carrier will fill up his satchel and take all
19 of the mail that he'll be able hand-carry with him to go out
20 to conduct his first loop or first set of relays.

21 As I say, on the way to the vehicle, the carrier
22 will pick up the trays of DPS if it's one of those
23 particular stations that has a DPS product.

24 At the vehicle, the carrier will then place the
25 first trays that they are going to access in the front of

1 the vehicle, so there will be typically a tray of DPS, a
2 tray of letters, a tray of the flat product, and there will
3 be a bundle that will be placed appropriately.

4 Carriers each have kind of their specialty where
5 they would like to put their marriage mail piece. Some of
6 them use a separate tray, some of them will take and place
7 it on top of something else, but in a convenient location.

8 Typically, all the product is placed on the left
9 side of the vehicle. The remaining product that's not going
10 to be used on the first part of the route is all placed on
11 the back of the vehicle, and if everything works out well,
12 they'll be placed in a manner such that when the carrier
13 goes back to restock the vehicle, the trays that they're
14 going to need next are the ones right close to the tail end
15 of the vehicle.

16 In some stations then, once the trays and
17 everything has been emptied into the vehicle, the hamper
18 will be -- may be flipped over and left on the location
19 right there where the truck was parked.

20 Or, in some situations, the trucks had been
21 relocated to the dock area to perform this loading function.

22 And the hampers will be pushed back in the docking
23 area. So now the carrier is ready to move on to the street.

24 So during the street part, and let's take a curb
25 route, and I think we had a good explanation of this

1 yesterday, the carrier will, once he reaches the particular
2 delivery point, will then rotate and reach to the tray of
3 letters, reach to the tray as they will go through a
4 fingering operation to get the appropriate letters.

5 He will then go to the tray of DPS, do a fingering
6 confirmation process on the DPS product, will then go to the
7 tray of flats and reach to the tray of flats.

8 If that particular delivery point had one of the
9 detached label cards there, the carrier would then reach to
10 and obtain the detached label product, and then would be
11 ready to take and access the particular curb delivery point.

12 There are different handling methods then, but --
13 and our method would kind of recommend the one pass method
14 where the carrier would then reach out.

15 We're taking the most complex again, so the flag
16 was up, so the carrier will stroke, knock the flag down,
17 open the door to the box, insert mail, and the time they're
18 inserting the mail, they'll reach under and palm and bring
19 the collected mail out, flip the door shut, and they're
20 ready to move on to the next delivery point.

21 So, as I say, in a typical area, if they happen to
22 have a parcel and it was a Number 2 size rural box when they
23 pulled up, and the parcel was such a size that the carrier
24 knew he could have it, the carrier would have also deposited
25 the parcel in there.

1 Typically, in a parcel situation, it will not be a
2 one-pass method; there will be an additional pass that take
3 place as the carrier will put the parcel, typically on top
4 of the mail product that other products that have been put
5 into the bottom of the rural box first. Does that help?

6 COMMISSIONER OMAS: Yes, it does. Now, for each
7 delivery made, does your data track the number of bundles or
8 trays involved or the methods used to handle them? Is that
9 what delivery type codes DC09 means?

10 I'm looking now at your answer to Advo-106, under
11 the heading, Counts for Delivery Types. From your data,
12 could you determine how much more time it takes to use one
13 bundle method compared to another?

14 THE WITNESS: We did not determine from this data.
15 We became aware of the fact that the number of bundles of
16 product that the carrier was taking to the street with him
17 did impact the processing time.

18 From the additional data that we have developed in
19 developing the Engineered Standards, we have developed
20 information relative to that issue. But we did not -- like
21 I say, we identified the number of bundles here, but we did
22 not actually do a time variation analysis from this
23 information.

24 COMMISSIONER OMAS: Okay, just one more question:
25 If a carrier making a delivery has more separate bundles to

1 deal with now than he did when the STS survey was conducted
2 a dozen years ago, could that explain why your survey finds
3 higher proportions of load time than that of the earlier
4 survey?

5 THE WITNESS: There appears to be a direct
6 relationship to the number of bundles that a carrier has to
7 carry and how much processing time it takes on the street,
8 so as the number of bundles increase, the longer it's going
9 to take the carriers to process the product.

10 COMMISSIONER OMAS: Okay, now, I have just sort of
11 question for my own edification. My particular situation
12 where I live is a park and loop.

13 And I occasionally have observed my letter
14 carrier, and it seems that a lot of time is spent in the
15 vehicle, preparing to go on the loop.

16 Where is that time in the vehicle? What is that
17 attributed to?

18 THE WITNESS: Depending on the size of the loops
19 that you may have on a route, some of the carriers can
20 service those easily from the trays that are in the front of
21 the vehicle, but there are other situations where on a park
22 and loop route, all of the mail is stored in the back of the
23 vehicle, and also from a safety standpoint, there are parts
24 of your operations that require all of the mail to be stored
25 in the back of the vehicle so that it can all be locked up.

1 And in those situations, now you have a carrier
2 that is accessing the trays of each one of the products that
3 are in the back of the vehicle to load the satchel, and the
4 more bundles that are there, then the longer time it's going
5 to take the carrier to do that.

6 Also, the break points that are there on the
7 route, that is, how much mail can fit in the satchel and how
8 much the carrier can easily allocate to his arm would also
9 impact that.

10 COMMISSIONER OMAS: What do you charge that time
11 to?

12 THE WITNESS: That would be charged to street
13 support time.

14 COMMISSIONER OMAS: Thank you very much.

15 CHAIRMAN GLEIMAN: Commissioner Goldway?

16 COMMISSIONER GOLDWAY: Well, my question relates
17 to some confusion that we have regarding the amount of time,
18 the proportional amount of time the city carrier spends in
19 the office and on the street.

20 The USPS, in response to an MPA interrogatory,
21 MPA-USPS-8, reports that in 1998, 67.9 percent of city
22 carrier is street time and 32.1 percent is office time.

23 On the other hand, in response to MPA/USPS-12(a),
24 the Service states that routes are configured as close as
25 possible to create an eight-hour work day, four hours in the

1 office and four hours on the street.

2 Now, in your response to MPA/USPS-T-13-56, which
3 we were looking at yesterday, you give a breakdown of the
4 time that you watched a carrier, as I understand.

5 And virtually all of those times were more than
6 eight hours a day. Is that the right document for us to
7 look at to determine the average time the city carrier
8 spends? Does he have an average eight-hour work day, or is
9 it, on average, longer, and therefore we're paying overtime?

10 And what percentage of time is in the office,
11 versus on the street?

12 In looking at 56, initially, we would have thought
13 that that indicated the city carrier was always spending
14 more than eight hours a day. But your response yesterday
15 indicated that that was actually the time your counters were
16 looking at a route, as opposed to the city carrier person.

17 So, where would the documents be or could you get
18 them for us in your studies, that would show us the average
19 daily hours a city carrier worked and what proportion of
20 time is spent in the office and on the street?

21 THE WITNESS: Well, your powers of deduction are
22 good. Do not use the table that we were referring to
23 yesterday to try to say this is a typical carrier day.

24 Those -- when we were studying the carriers, we
25 studied them from the time they arrived in the morning. We

1 were looking at the route, so that you're right, it is not a
2 particular carrier.

3 As well as, that sheet also includes the lunch
4 time; that is, our work sampling activity went right through
5 the typical half-hour break. So, definitely don't use that
6 for the area that you're interested in.

7 We have other information. I could put that on
8 the to-do list. It would show you for the routes that we
9 observed, what the typical hours were and the breakdown for
10 inside and outside time.

11 Sixty/40, 70/30, some of them are higher
12 office-oriented, lower-street; some are higher-street, say
13 five hours on the street, and only three hours in the
14 office.

15 So there is considerable variability as to the
16 percent of time that a carrier's route will be dedicated to
17 certain activities.

18 COMMISSIONER GOLDWAY: Well, I would appreciate --

19 THE WITNESS: Seeing some of that variability.

20 COMMISSIONER GOLDWAY: -- getting that information
21 from your data that we can, so that we can relate it to what
22 the Postal Service has indicated for its average and its
23 policy.

24 Is your sense from your gut feeling about the data
25 now that the Postal Service's comment that 67.9 percent of

1 the city carrier workload is street time, and 32.1 is office
2 time is right or is it 50/50? Do you have a sense?

3 THE WITNESS: I would say that from an actual
4 standpoint, that roughly around that 65 to 70 percent range
5 and that --

6 COMMISSIONER GOLDWAY: On the street.

7 THE WITNESS: Yes, is more typical. And I would
8 say also, one other -- one of the things that we've done is,
9 in our approach that we've done for the entire Engineered
10 Standards product, one of the things that we've done is work
11 on route design, to determine how many hours should be in
12 the office and how many hours are in the street, based on
13 the Engineered Standards.

14 And those routes vary significantly. So a general
15 rule of thumb would be that a carrier should have four hours
16 from a route design, four hours in the office, and four
17 hours on the street.

18 The particular type of route that the carrier has,
19 however, may indicate that, once again, they may have
20 relatively short amount of time in the office, casing, but
21 due to a substantial amount of travel or things that are
22 associated with on the street, they'll have a much higher
23 percentage on the street.

24 Other routes are what we might call more
25 casing-intensive, where they will spend much more time in

1 the office, casing, and much less time on the street. And
2 there is considerable variability.

3 COMMISSIONER GOLDWAY: Well, we'd appreciate
4 getting the information that your data provides, so we can
5 see what you've found actually in your survey for the routes
6 that you were able to cover.

7 THE WITNESS: Okay.

8 MR. COOPER: We will add that to the list.

9 COMMISSIONER GOLDWAY: Thank you.

10 CHAIRMAN GLEIMAN: Commissioner Covington?

11 COMMISSIONER COVINGTON: Good afternoon, Mr.
12 Raymond. I'd like to seek a little clarification and ask a
13 few general questions as it relates to your engineering
14 study.

15 Ironically, Mr. Baker, in the interrogatories that
16 was forwarded from the NAA went a long way with more or less
17 giving me a background on how an industrial engineer was
18 involved with so much statistical and sampling-type data.

19 But I notice in your biographical sketch where you
20 began out as a machinist, I guess, from a vocational or
21 trade point of view, up in Vermont. And then that more or
22 less evolved over to your engineering background.

23 The first question I have for you is, during your
24 career up to this point, how many field trials or how many
25 studies have you done of this nature, of have you been

1 involved or affiliated with?

2 THE WITNESS: It is going to take me a minute. I
3 am not quite as fast. But a considerable number of studies
4 that I have done over my career that have dealt with
5 developing engineered standards and methods. It is
6 probably, let's say of all the man-years that I have done
7 put in in industry, you are probably talking about greater
8 than 50 percent of all the time that I have spent has dealt
9 with the developing of engineered methods and standards over
10 my 25-plus years career in this environment.

11 COMMISSIONER COVINGTON: Okay. And in one of your
12 responses, you refer to a gentleman by the name of William
13 M. Lloyd. Who is William M. Lloyd?

14 THE WITNESS: He is a vice president of the
15 organization and he is the gentleman that is sitting over
16 there next to Dennis Stevens that is working with us. That
17 is Mr. Lloyd sitting right there.

18 COMMISSIONER COVINGTON: Okay. Which leads me
19 specifically into my next question, with your ES design, and
20 with all the work that you undertook for the United States
21 Postal Service in this area, do you think that your sample
22 size is adequate?

23 THE WITNESS: Yes, I do.

24 COMMISSIONER COVINGTON: And what input, if any,
25 did you have with the development of the bar code? And I

1 will go a step further, bar code TimeWand 2, what are we
2 talking about? Is it one and the same?

3 THE WITNESS: The TimeWand 2 is a device that is
4 about roughly the size of a pack of cigarettes and, as I
5 say, due to one of my career experiences in the past where I
6 had attempted to do this type of studies manually, where we
7 were using some sort of digital watch and attempting to do
8 work sampling, time studies and everything, I then looked
9 for a better method with which to be able to collect lots of
10 information about clients' operations, and at that time
11 discovered that using a bar code methodology, and after
12 considerable research, the TimeWand 2 is a very nice
13 handheld device that allows people that are performing data
14 collection to stay very focused on their subjects, and it
15 becomes a matter of very simple, easy process to be able to
16 scan a bar code. So that, let's say, if we are using the
17 example of the carrier being on a curbside route, when that
18 vehicle came to a stop, it was very easy to say that I am
19 now going to be at the point of delivery, in other words,
20 those defined locations.

21 So I found it to be an extremely useful tool to be
22 able to collect data about clients' operations. So I am the
23 one that did all the research, I am the one that found the
24 Videx Company, their particular product, talked to their
25 particularly VARs, did research on other products and came

1 up with that process.

2 Mr. Lloyd had the either misfortune or good
3 fortune to, having been involved from, okay, now that you
4 have the concept, and now that you have found and we know we
5 can do it, how are we actually going to do it? So, Mr.
6 Lloyd got involved in the very first assignment with
7 actually creating the bar codes and working with the
8 software to use the device to collect data.

9 COMMISSIONER COVINGTON: Okay. When I was looking
10 at your biographical sketch and your work experience, I
11 think at one time you had done some work with Bell South. I
12 had two questions about that in which you stated that the
13 assignment under which you all undertook was, in your own
14 words, very successful. I need to know whether you employed
15 the TimeWand 2 bar code concept there, and then I need to
16 know roughly what timeframe are we talking about. Was that
17 prior to your undertaking the Engineered Standards design,
18 or was that in conjunction with?

19 THE WITNESS: The work for Bell South was all done
20 prior to working with the Post Office on this environment,
21 and they are the client that I had been doing this sort of
22 combination of data collection manually with, and then as
23 they continued to want additional data collected, I felt
24 that they could be better served. I need to find a better
25 method. The other methodology was just very time-consuming,

1 painstaking, it took a lot of time.

2 So, Bell South was a transition customer. They
3 went from using the manual approach doing these sort of
4 complex studies to using the TimeWand 2 to be able to
5 collect data for them and their environment, operating
6 environment.

7 COMMISSIONER COVINGTON: So, in other words, you
8 kind of cut your teeth on Bell South?

9 THE WITNESS: That and a lot of other things.

10 COMMISSIONER COVINGTON: All right. Now, which
11 leads me to my next question. I was noticing in your
12 testimony with regard to your quality assurance, I am trying
13 -- I am a little confused. I don't know exactly whose hand
14 is in the pie more, whether it is USPS, Foster & Associates
15 or whether it is Resource and Process Metrics. Who actually
16 has the -- in other words, who is the controlling factor as
17 far as figuring out the data that you all are collecting,
18 whether or not the bias is there and how reliable it is?

19 THE WITNESS: I would say that that responsibility
20 for designing what data had to be collected, how it had to
21 be collected, why it had to be collected, how I thought I
22 might intentionally use it, and the fact that we wanted to
23 have it available for lots of other uses, all that came to
24 me. The Post Office, I was a little bit taken aback because
25 the first time the client said we need to have you apply

1 your total expertise in all of this, unencumbered by
2 anything that we have done in the past, and you have total
3 freedom to design and put together everything that is needed
4 with the first phase of the industrial engineering standards
5 product.

6 They served in a technical capacity. They
7 supplied resources, computers and various other aspects of
8 it, but they really allowed us, for the first time in my
9 career, to really do absolutely everything in trying to
10 collect and bring all the information to the table.

11 We used their services. They were curious. They
12 had never seen any data collection of this sort of approach
13 in the past, and so they were very interested and supplied
14 subject matter experts, so they would go to the field as
15 part of the quality assurance process to monitor the people
16 who were out there and were collecting data in the field.
17 So they did play a role in that, and if questions were to
18 arise, or issues were to come up with that, they were out in
19 the field actually observing the processes.

20 COMMISSIONER COVINGTON: So, in other words, I
21 appreciate the fact that the Postal Service gave you that
22 much autonomy. What constituted -- I think also in your
23 testimony, you stated that there were three USPS subject
24 experts. What would that be? What three subject matter
25 experts were involved during this engineering standards

1 study?

2 THE WITNESS: I would describe one of the experts
3 as he was a Postmaster of a Postal facility kind of in the
4 South, I guess. Right offhand, I can't remember the exact
5 Post Office, it was -- I think it was someplace in the
6 Virginia Beach or the Atlanta area, where he had come up
7 through the ranks and got detailed to come to this
8 particular job to give assistance, and so he was on board
9 working with us. I say probably in the early to mid years
10 of his particular career.

11 The contracting officer that was a member of the
12 engineering group that had done lots of projects for the
13 Post Office was also the technical officer, has an
14 industrial engineering background, had a career outside of
15 the Post Office for one of -- I don't know really how to
16 describe the relation, I believe he was employed by UPS at
17 one time in their industrial engineering division, so had an
18 extreme interest in this area. And as a contracting
19 officer, he has had quite a few years as well experience
20 with the Post Office and in dealing with these particular
21 type of projects.

22 The third gentleman was a senior gentleman. He
23 had come up through the ranks, had worked in a variety of
24 positions, including Postmasters, he was from the Southern
25 area, retired Postal. Had been an area analyst type person

1 who had been doing some contract work for the Southern area
2 and came on board to give us the wisdom of his years of
3 experience in the Post Office. He was a very well-seasoned
4 former, I say former collector and had served many years.
5 He was assigned with us and worked with us like on a
6 full-time basis both in Phase 1 and in Phase 2.

7 COMMISSIONER COVINGTON: Okay. So, in other
8 words, you are probably saying that the subject matter
9 experts had to have more knowledge from an operational
10 standpoint of view, as opposed to technical?

11 THE WITNESS: I would say they brought with them
12 the years of experience of what it was like to be a city
13 carrier, as well as what it was like to be a first and
14 second level supervisor, because the system that we were
15 ultimately going to design was going to be a tool that the
16 first and second level supervisors in the Postal facilities
17 would ultimately be using.

18 COMMISSIONER COVINGTON: Which brings me to the
19 next point, I notice that you had to do a lot of -- I think
20 a lot of consideration had to go into the objectives and the
21 goals and missions you were trying to accomplish here. It
22 is almost like you can't serve two masters, you know, at
23 least you love one and despise the other. I found it kind
24 of interesting -- tell me, what did you mean by, when you
25 were looking at certain criteria that you had to consider as

1 far as the statement of work was concerned, what constitutes
2 potential gender-based performance distinctions?

3 THE WITNESS: Usually if you get to the point
4 where you are going to be involved in an arbitration the
5 people that are involved in those cases usually don't bring
6 in what they would consider to be their prime workers. They
7 usually bring in the extremes of what you would consider to
8 be a bell curve, and so therefore we wanted to try to make
9 sure that our data encompassed what we would consider to be
10 the appropriate characteristics of your population.

11 COMMISSIONER COVINGTON: Now would this be the
12 workforce population that you were observing, meaning USPS,
13 or was this the data collectors that you had as a part of
14 the project?

15 THE WITNESS: No, this would be the sample from
16 which we were picking -- these would be the UPS carriers.
17 In other words, we wanted to have --

18 COMMISSIONER COVINGTON: USPS.

19 THE WITNESS: Yes, excuse me, USPS carriers.

20 COMMISSIONER COVINGTON: Okay, and one last
21 question.

22 As far as your data collectors were concerned I
23 noticed that there was a lot that went off into I guess
24 adequately getting them prepared since this study was so
25 critical, as you may recall if you were in the room

1 yesterday. I was asking Witness Baron about, you know,
2 whether the data that was compiled would be considered -- I
3 mean prior data that the Postal Service had been basing a
4 lot of their efforts on, whether it would be considered to
5 be obsolete or whatever, but with your data collectors did
6 you actually and/or Mr. Lloyd actually take these
7 individuals, you know, nurture them and train them and then
8 oversee them on a day to day basis, or was that done
9 separate and outside of the scope of the work that you
10 agreed to do with regard to this contract?

11 THE WITNESS: Well, this kind of goes back to my
12 apprenticeship training. In Phase 1 there was a group of
13 individuals who came on board who were going to ultimately
14 be people involved in the data collection and analysis of
15 that information as well.

16 Some of these people were from the various
17 consulting companies that were involved, and some of these
18 people were independent contractors that had been involved
19 with me on the Bell South assignment that were used to using
20 a bar code scanner.

21 So they participated, that particular group
22 participated in saying what information are we going to
23 collect, how are we going to collect it.

24 During that process we identified the fact that
25 there were considerable debates that would go on, yet when

1 we would go to the field with these people, and I made trips
2 to the field and Mr. Lloyd made trips to the field and
3 others made trips to the field, it would become very obvious
4 to us that for our definitions of location people would say
5 to us, is he at the point of delivery? From our definition
6 it meant the carrier had reached the point of delivery.

7 All the time that he spent traveling to get to the
8 point of delivery could be identified from our perspective
9 in simple things like is he driving to get there or is he
10 going to drive and then walk to get there, or is he just
11 going to walk to get there?

12 So as we went through this process, it became from
13 a work sampling perspective a very straightforward process
14 to define all the different criteria that we were going to
15 collect, all the way down to the type of receptacles.

16 It is pretty easy to say this is a number one size
17 row box or a number two or this is a slot in the door, so
18 those group of people were very active in all this design
19 and development of what was going on and so they were the
20 ones that formed the nucleus for the Phase 1 data
21 collection.

22 Phase 2 data collection, when we got to the point
23 and the post office and we all came to agreement that we
24 were going to proceed, a few of the Phase 1 data collectors
25 then took on the first group of what was going to be the

1 Phase 2 data collectors and for about three weeks it was
2 very hands-on, like one-on-one training, where a group -- a
3 Phase 1 person -- and these people, the people that migrated
4 from Phase 1 became the quality assurance people in Phase
5 2 -- would take one or two people out with them and they
6 would go out right on the street.

7 They would go out there and say, okay, this is how
8 you use the bar code scanner and this is what we mean by the
9 information, so it was very hands-on for about three weeks'
10 worth of time.

11 Then the next wave came on board and we used the
12 same very much hands-on training approach. We also had a
13 larger group of people in a room so there would be lots of
14 discussions, but it was all hands-on, guided by people that
15 had evolved up through the study.

16 Now on occasion I'd get to go to the field, but it
17 would be so rare I would summarize that Mr. Lloyd and I were
18 not the people that were out in the field on a day-to-day
19 basis. It was other people that had worked their way up
20 through on this particular study.

21 COMMISSIONER COVINGTON: Okay. Thank you, Mr.
22 Raymond for your answers. That is all I have, Mr. Chairman.

23 CHAIRMAN GLEIMAN: I have a couple of questions.

24 First, I would like to follow up on a question, a
25 response that you gave to Commissioner Omas

1 He mentioned that he lives on a park and loop
2 route and he described what he has observed and you
3 responded that the time that the carrier spends on a park
4 and loop route at the back end of the vehicle, preparing to
5 walk the route, is assigned to street support time.

6 You also as I recall described what the carrier
7 might be doing is pulling mail from trays to either load up
8 the satchel and/or one's arm with the mail that was going to
9 be delivered to the delivery points on that route.

10 Now yesterday I asked Witness Baron a question
11 about the assignment of the time that a carrier spends on a
12 curb line route. When he pulls up to the box, and you
13 discussed this earlier on when you were describing curb
14 line, and swivels around to his left and starts to reach
15 into the perhaps four trays that are there, and that time
16 according to Mr. Baron, when I asked him, was assigned to
17 load time.

18 Now the function that is being performed by a
19 carrier in a vehicle when he pulls up to a mailbox at a curb
20 line and swivels around to pull mail out of trays is
21 functionally equivalent to what a carrier is doing at the
22 back end of the vehicle, as you described it, on a park and
23 loop route, albeit he is doing it for more than one delivery
24 point.

25 Why would you assign -- and let me back off for a

1 minute. I view it as functionally equivalent. You made a
2 statement before that one of the questions that you looked
3 at in trying to assign time was has he reached, has the
4 carrier reached the delivery point.

5 If there is a functional equivalence between
6 swiveling around and pulling it for one box and going to the
7 back of the vehicle and pulling it for a number of delivery
8 points all at once, why would that question be the
9 determining fact on a functionally equivalent activity in
10 the sense of assigning either to street support time or load
11 time?

12 I can understand the difficulty conceptually on
13 how you assign it, but it would seem to me that if a carrier
14 spends on a part and loop route at the back of the vehicle
15 five minutes loading up and there are ten delivery points
16 that he is going to deliver to with that arm-load or satchel
17 load of mail that you would divide that time by ten and
18 assign it functionally to each of the houses.

19 Why would you not do that?

20 THE WITNESS: My understanding when I was looking
21 at street support, it is like bulk activity where I am going
22 to be dealing with multiple delivery points. Once I have
23 reached a unique customer's location then the amount of time
24 that I have to reach and access, get the mail for that
25 particular product, because I can't have it all carried in

1 my hand at one time -- I have got to reach to multiple
2 locations to get it -- so street support we said is bulk.

3 I am dealing with multiple delivery points, like
4 at the beginning of a loop I am setting up, I am doing
5 everything in terms of bulk. When I have reached that
6 particular delivery point, all of the actions that are
7 associated with putting multiple pieces of product,
8 different types of mail in the different parts of the
9 receptacle would be considered load time.

10 CHAIRMAN GLEIMAN: But if indeed, and I don't know
11 exactly how it works, but if a carrier stands at the back of
12 the vehicle on a park and loop route and says, okay, house
13 number one on my walk sequence I am going to pull from trays
14 1, 2, 3 and 4, and I am going to line it up and put it in my
15 right arm, since I am left-handed, and then I am going to
16 pull house number two, 1-2-3-4, load it up.

17 I have got it in walk sequence on my arm. In
18 effect, I have done -- doing that for each one of those
19 houses is the equivalent of what my carrier does when he
20 pulls up in front of my house and pulls out of the four
21 trays to load into my box.

22 I understand, you know, that it is a bulk
23 activity, as you describe it, but you are doing -- I would
24 assume that it is being done on a house by house basis.

25 THE WITNESS: No.

1 CHAIRMAN GLEIMAN: He's just pulling the entire
2 block and then he organizes as he walks?

3 THE WITNESS: He has a rubber band. He does that
4 pull-down process into his tray. He may elect to rubber
5 band what he considers to be an appropriate grouping, so
6 that when he reaches into those trays or he may have turned
7 a letter on in -- I didn't get into all of the details -- he
8 reaches and gets to what he considers to be the break points
9 for that loop, so it is not as if he is taking house one,
10 house two, putting that on there. He may be serving ten,
11 fifteen, twenty customers out of everything he has loaded on
12 his arm, and then as he goes he may have to migrate to a
13 satchel to them restock different parts of what he is
14 holding in his hand.

15 CHAIRMAN GLEIMAN: So it is not in effect the
16 functional equivalent?

17 THE WITNESS: No, no. One is very much dealing
18 with a whole series of multiple ones. The other one is
19 dealing with that unique situation.

20 CHAIRMAN GLEIMAN: Okay. That helps me. I was
21 kind of confused as to why time would be assigned one way
22 and not another and that helps, and I appreciate that.

23 Witness Baron used your work sampling data to
24 estimate the percentage of carrier time spent in street time
25 survey activities, the load, route access, street support,

1 driving and collection, and those results are presented in
2 his testimony in a table.

3 In your response to Advo-109(b), you said that you
4 did not attempt to relate the specific work sampling data to
5 time standards, since the comparative analysis was not
6 requested by the Postal Service. Now notwithstanding the
7 fact that the Postal Service didn't request that, the
8 question I have is do you believe that your time studies or
9 the time standards that were developed can be used to
10 estimate the proportion of street time spent on either load
11 or route access activities?

12 THE WITNESS: I believe that we have what we would
13 call a "standards based model" that would give you insight
14 into those various activities.

15 CHAIRMAN GLEIMAN: Can I infer from what you are
16 just said that you believe that the time study results or
17 the standards are consistent with the work sampling results?

18 THE WITNESS: Let me try to clarify this.

19 Time studies along with the work sampling data is
20 not what really constitute our engineering standards model
21 that we have. That is really what we consider to be a model
22 that was based on the predetermined work measurement system,
23 and then the application tool gets fairly complex, as most
24 mathematical models are of different variations.

25 That particular model run for a certain ratio of

1 letters, flats, DPS and other physical attributes of the
2 routes that are part of that model, the results of running
3 that model we would be able to extrapolate out of there
4 information that would give you a comparison to your six STS
5 categories, and I truly do not know exactly how that model
6 would fall out in doing this, but it can be done.

7 CHAIRMAN GLEIMAN: Thank you. I have no further
8 questions.

9 Follow-up questions from the bench? None?

10 That brings us to redirect. I assume you would
11 want some time with your witness.

12 MR. COOPER: If he is like me, he might need some
13 calories too.

14 CHAIRMAN GLEIMAN: I was going to suggest that we
15 double up on this one. Hopefully he won't get indigestion
16 if he eats lunch and prepared for redirect at the same time.

17 I'll tell you what. We'll come back at 2 o'clock.

18 We will finish up with this portion of Witness
19 Raymond's testimony and then we will go into our closed
20 in-camera hearing, if indeed parties wish to cross examine
21 at that point of time on materials that were submitted under
22 protective conditions, so we will come back at 2 o'clock.

23 Thank you.

24 [Whereupon, at 12:58 p.m., the hearing was
25 recessed, to reconvene at 2:00 p.m., this same day.]

1 AFTERNOON SESSION

2 [2:03 p.m.]

3 CHAIRMAN GLEIMAN: Mr. Cooper, do you have any
4 redirect?

5 MR. COOPER: Yes, sir, I have a few questions.

6 CHAIRMAN GLEIMAN: Please proceed.

7 Whereupon,

8 LLOYD RAYMOND,
9 a witness, having been previously called for examination,
10 and, having been previously duly sworn, continued to be
11 examined and continued to testify as follows:

12 REDIRECT EXAMINATION

13 BY MR. COOPER:

14 Q Now, Mr. Raymond, a few moments ago before the
15 break, the Chairman asked you about a time standards model
16 and whether or not it could be used to simulate Postal
17 operations; do you recall that?

18 A Yes, I do.

19 Q Could you tell us whether the time standards that
20 you developed reflect the current operating environment or
21 some other operating environment for the Postal Service?

22 A No, it doesn't reflect the actual current work
23 methods that are being used in the Post Office. It reflects
24 what we developed as the engineering set of recommended Post
25 Offices, so it's not based upon your actual operations the

1 way you're out there working today.

2 [Pause.]

3 Q Now, in your questioning by Mr. Baker, he asked
4 you about your response to Advo Question 66.

5 And in the context of that questioning, he asked
6 you to confirm during the break, whether two observations
7 bearing the dates December 9th and December 10th, 1996,
8 were, in fact the same route day.

9 Did you have an opportunity to confirm that?

10 A Yes, and those are the same route day. That data
11 should all be consolidated into the 12/9 date.

12 Q Now, counsel for Advo asked you at one point about
13 a couple city codes, what are known as city codes or what
14 we've been describing as city codes, in particular, CY66 and
15 CY04, and he asked you if these were test implementation
16 sites.

17 And at the time, you didn't or weren't able to
18 give a definitive answer. Can you give us a definitive
19 answer now, whether CY66 and CY04 represent test
20 implementation sites?

21 A Yes, both those sites became test implementation
22 sites.

23 Q Mr. McLaughlin also asked you about your response
24 to Advo Interrogatory Number 61, which refers to 981 route
25 days, or relates to 981 route days.

1 You indicated a need to double-check on exactly
2 what those 981 route days represented, because you were
3 asked whether or not they relate to the route days provided
4 to Witness Baron.

5 Have you had an opportunity to double-check on
6 that?

7 A Yes, I have.

8 Q Was it -- is there any reason to believe that the
9 981 route days should have had any relationship to the
10 number of route days given to Witness Baron?

11 A No, volume information was not something that
12 Witness Baron had requested that we present with him. So,
13 my interpretation of Question Number 61 was that someone had
14 asked us for volume information, so we gave them as much
15 volume information as we could put together.

16 MR. COOPER: That's all, Mr. Chairman.

17 CHAIRMAN GLEIMAN: Is there any recross?

18 [No response.]

19 CHAIRMAN GLEIMAN: If not, that completes the
20 cross examination on most of the evidence sponsored by
21 Witness Raymond. We, however, have had two requests for
22 cross examination concerning material that was provided
23 under protective conditions.

24 The only individuals who may sit in on the next
25 portion of the hearing, which will be an in camera hearing,

1 are individuals who have signed agreements to abide by the
2 protective conditions established in Presiding Officer's
3 Ruling Number 27.

4 If you have not done so, and you wish to stay in
5 the room, you've got about five minutes to wander over to
6 the Docket Room and ask the Docket Clerk to give you a copy
7 of the agreement to sign.

8 We will resume in about five minutes. The Postal
9 Service officials, counsel, and witnesses do not have to
10 sign, as I understand it. Neither do my colleagues or I,
11 although I actually have signed as a matter of course. But
12 if there is anyone else in the room who wishes to remain and
13 hasn't signed, then they need to do so.

14 We'll take a couple of minutes break, and when we
15 resume, it will be in camera, and the transcript of the in
16 camera session will be a separate volume of the transcript
17 that will not be widely distributed. It will be distributed
18 in accordance with the rules we established earlier on for
19 transcripts for in camera sessions. So, with that, anybody
20 that needs to go sign, sign; anybody who doesn't want to
21 sign, see you tomorrow.

22 [Whereupon, at 2:10 p.m., the Open Session of the
23 hearing was recessed, to be reconvened on Thursday, May 11,
24 2000, at 9:30 a.m., and the hearing proceeded into in camera
25 session.]

