

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO ADVO INTERROGATORIES
(ADVO/USPS-T13-24-38, 69, 102)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-38, filed on March 15, 2000, ADVO/USPS-T13-69, filed on March 16, 2000, and ADVO/USPS-T13-102, filed on March 23, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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Washington, D.C. 20260-1137
May 16, 2000

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

ADVO/USPS-T13-38. Please confirm that the database you filed in LR-163 (and any subsequent updates or variations of that database) does not include any information identifying the observer codes for any observations.

(a) If you cannot confirm, please identify specifically where this information can be found in the LR-163 database (or any other databases that have been filed in this proceeding).

(b) Please provide a re-filed database, in hardcopy and electronic spreadsheet format, that identifies for each record (tally) the data collector who actually recorded the data (by observer code number). If such information is not available, please so state, and explain why it is not available.

(c) If there are no data or other information that would enable a matching of each tally with the data collector who actually recorded the tally, please provide a re-filed database, in hardcopy and electronic spreadsheet format, that identifies any segments of observations for each route-day where the data collector (by observer code number) was different from the one who was listed as the "Observer" at the start of the day. If such information is not available, please so state, and explain why it is not available.

(d) If there are no data or other information that would enable a matching of either (i) each tally with the data collector who actually recorded the tally, or (ii) segments of tallies where the identified data collector is different from the one identified at the "Observer" at the start of the day, please provide a refiled database, in hardcopy and electronic spreadsheet format, that identifies for each route-day the data collector who was listed at the start of the day as the "Observer" (by observer code number). If such information is not available, please so state, and explain why it is not available.

RESPONSE:

(a) Confirmed. The LR-I-163 does not contain observer codes.

(b-d) Please refer to the Access database LR-I-337, to be filed shortly. Please see my response to ADVO/USPS-T13-37.

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ADVO/USPS-T13-69. For each of the types of tallies identified below from the LR-163 database, please explain fully how these tallies occurred:

- (a) 492 tallies with the same time and observation information;
- (b) 20 tallies with the same time but different observation information;
- (c) 1,325 tallies that are taken within 5 minutes of another tally, including 241 tallies taken within 3 minutes of another tally;
- (d) Tallies that are greater than 6 minutes apart but do not appear to be the result of some sort of uncompensated break (e.g., 295 tallies that are 11-12 minutes after another tally, and 610 tallies that are 12-15 minutes after another tally).

RESPONSE:

- (a) The duplication of the 492 tallies is due to the barcode scanner retaining the previous scan sequence when entering the quantity information in level 13. 1 tally type of each of the 371 tallies should remain in the database. The duplicate tallies should be deleted from LR-I-163. LR-I-337, to be filed shortly, contains a revised version of LR-I-163.
- (b) I have not been able to locate 20 such tallies that have the same time but different observation information in the remaining 18 data fields.
- (c) The observers were instructed to take the mental snapshot of the carriers actions and location when the beep sounded from the scanner. The scanning of the observation made was to take place as soon as the observer was able to safely scan the codes. In a relatively small number of cases, this took as long as five minutes.

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(d) The observers were instructed to take the mental snapshot of the carriers actions and location when the beep sounded from the scanner. The scanning of the observation made was to take place as soon as the observer was able to safely scan the codes. The lack of lunch break information in the data provided to witness Baron, provides one possible an explanation. Please refer to the "A03" codes provided in USPS-LR-I-316.

Please see Tr. 19/8065-69 for other additions to LR-I-163 that will provide an explanation for some of the tallies with greater than a six minute break.

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ADVO/USPS-T13-102. Please provide the Outside Study data in Access Database Format, for each route-day, including the following:

- (a) All data for Levels 1, 2, 3, 3.1, 4, 5, and 6.
- (b) The ending vehicle odometer readings.
- (c) All Outside Study/Outside Work Sample Observations (counts and tallies) for Levels 8.3, 8.4, 9, 10, 11.1, 11.2, 11.3, 11.4, and 11.4.1, and times.
- (d) The observer code for the second person on the team.
- (e) The trainer code for all trainers accompanying observers.

RESPONSE:

(a-e) Please see the Access database provided in Library Reference LR-I-238.

Note that, with respect to (e), the observers conducted the training. Thus, in the database provided, trainers are identified as observers. Those accompanying the observers are identified as trainees (there were no such trainees in Phase 1).

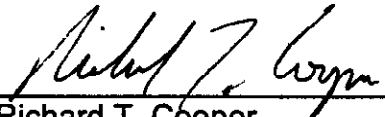
DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond
Date: 5-16-00

CERTIFICATE OF SERVICE

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


Richard T. Cooper

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