

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

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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-T13-116, 119, 123-127, 129-130, 134, 136)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-116, 119, 123-127, 129-130, 134, 136, filed on March 30, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 23, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. FOLLOW-UP INTERROGATORIES**

ADVO/USPS-T13-116. Your responses to:

- MPA/USPS-T13-61 and 62 suggest that USPS LR I-220 (Engineered Standards Book of Forms/Pictures) explains how to identify and distinguish among each of the Level 10 Locations in Appendix D.
- MPA/USPS-T13-64 suggest that USPS LR I-220 explains how to identify and distinguish among specific Level 11.2 Delivery Types.
- MPA/USPS-T13-78 suggest that USPS LR I-220 explains how Level 11.3.1 Activity Detail codes should be associated with Level 11.4 Activity codes.

Please confirm that LR I-220 contains only the following. If you cannot, please explain why not and make all necessary corrections.

(a) Fourteen pages of sample USPS forms, none of which demonstrate how to identify Locations, Delivery Types, Activity, or Activity Detail codes.

(b) Eight pages of diagrams of which five are diagrams of in-office activities.

(c) A "Delivery-Basic" diagram that covers only three route types (park & loop, walking, curbside) but does not explain how to identify them (as either Level 11.2 or Level 11.3 codes), provides no explanation of when one location or delivery type begins and the other ends, provides no explanation of when one activity begins and the other ends, and provides no explanation of how to apply the various (Level 11.4.1) activity detail codes.

(d) A "Delivery -Accountable" diagram that does not use any terms which are identical with the codes in your Appendix D, other than the Level 11.4 code for "Parcel" (F02), provides no explanation of when one location or activity begins and the other ends, and provides no explanation of how to apply the various (Level 11.4.1) activity detail codes.

(e) A "Collection" diagram that does not use any terms which are identical with the codes in your Appendix D, other than the Level Location code for "Collection Box," and the Level 11.4.1 code for "Collection Box," provides no explanation of when one location or activity begins and the other ends, and provides no explanation of how to apply the various (Level 11.4.1) activity detail codes.

(f) Four pages of sample maps.

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(g) Thirteen pages of in-unit photographs, none of which show the dock or demonstrate when the dock (Level 10) location begins or ends.

(h) Seven pages of vehicle photographs, none of which explain how to determine when vehicle location (Level 10) codes should be used.

(i) Four pages of photographs of collection and relay boxes, none of which explain how to determine when collection/relay box (Level 10) location codes should be used.

(j) Fifteen pages of photographs of mail receptacles, none of which explain how to determine when various location codes (e.g., vehicle, point of delivery, on route, in vehicle at stop, other route) should be used, how to determine when various activity codes should be used, and none of which (with the exception of gang box) show how to identify specific receptacle codes.

(k) Fifteen pages of photographs of mail in containers and various mail receptacles, none of which can be related to any of the Location, Delivery Type, Activity, or Activity Detail codes.

RESPONSE:

USPS LR-I-220, used in conjunction with oral instructions, served as a guide as to what types of activities, locations, vehicles, collection boxes, relay boxes, various mail receptacles, and other containers and carts holding mail a data collector may observe. USPS LR-I-220 was not intended to include every location, every mail receptacle, or every activity, nor was it intended to correlate directly to the various Levels associated with the barcode technology, and I did not intend to suggest that it did.

(a) Confirmed. Refer to my response to ADVO/USPS-T13-84 regarding photographs contained in LR I-220.

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- (b) Confirmed. Four diagrams are in-office activities as they relate to carrier activities. One diagram shows in-office activities as they relate to upstream activities performed by USPS personnel other than carriers.
- (c) Confirmed. Refer to my response to ADVO/USPS-T13-86 regarding the "Delivery Basic" flowchart of carrier activities and route characteristics used to develop the barcode method application. It was not the intent of the flow process charts to identify the work sampling codes, but to define the boundaries of the time study groupings. Application of the various activity detail codes was explained in my response to ADVO/USPS-T13-84.
- (d) Confirmed. It was not the intent of the flow process charts to identify the work sampling codes, but to define the boundaries of the time study groupings. Application of the various activity detail codes was explained in my response to ADVO/USPS-T13-84.
- (e) Confirmed. It was not the intent of the flow process charts to identify the work sampling codes, but to define the boundaries of the time study groupings. Application of the various activity detail codes was explained in my response to ADVO/USPS-T13-84.
- (f) Confirmed.
- (g) Confirmed, although two *vehicle* photographs show the dock (Long Life Vehicle Front View and ¼ Ton Jeep-Rear View). Application of the various location codes was explained in my response to ADVO/USPS-T13-84(b).

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- (h) Confirmed. Application of the various location codes was explained in my response to ADVO/USPS-T13-84(b).
- (i) Confirmed. Application of the various location codes was explained in my response to ADVO/USPS-T13-84(b).
- (j) Confirmed. Application of the various location codes was explained in my response to ADVO/USPS-T13-84(b).
- (k) Confirmed. Application of the various location codes was explained in my response to ADVO/USPS-T13-84(b).

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ADVO/USPS-T13-117. Your responses to:

- MPA/USPS-T13-61 and 62 suggest that USPS LR I-220 (Engineered Standards Book of Forms/Pictures) explains how to identify and distinguish among each of the Level 10 Locations in Appendix D.
- MPA/USPS-T13-78 suggest that USPS LR I-220 explains how Level 11.3.1 Activity Detail codes should be associated with Level 11.4 Activity codes.

Please confirm that LR I-220 contains no photographs of any carriers at any locations and no photographs of any carrier activities. If you cannot, please explain why not and provide all necessary corrections.

RESPONSE:

USPS LR-I-220, used in conjunction with oral instructions, served as a guide as to what types of activities, locations, vehicles, collection boxes, relay boxes, various mail receptacles, and other containers and carts holding mail a data collector may observe. USPS LR-I-220 was used during the process of oral instruction to identify locations where some carrier activities might occur.

USPS LR-I-220 was not intended to include every location or every activity, nor was it intended to correlate directly to the various Levels associated with the barcode technology, and I did not intend to suggest that it did.

Confirmed. LRI-220 contains no photographs of any carriers at locations and no photographs of any carrier activities.

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ADVO/USPS-T13-119. MPA/USPS-T13-69(e) asked for an explanation of why the data collectors assigned delivery type and delivery type status codes to locations that were not at the point of delivery. Based on your best belief and understanding of what the data collectors were instructed to do:

(a) Please explain the distinction between the tallies with delivery type and delivery type status codes and those that do not have such codes.

(b) Please provide all reasons for collecting that delivery type and delivery type status codes for non-Point of Delivery locations.

RESPONSE:

As I stated in my response to MPA/USPS-T13-69 (e), "based on the USPS Form 3999x delivery type the observer chose the code for either the delivery the carrier was servicing or the next delivery the carrier was traveling to."

(a) As I stated in my response to ADVO/USPS-T13-81 (d), "the 11.2 level outside delivery type could be N/A or the next delivery type the carrier was to encounter on the route. The 11.3 level delivery type status could be N/A or the next delivery type status the carrier was to encounter next on his route." Ideally, all tallies should have delivery type recorded. There were very few tallies (22 out of 38,557 based on LR-I-337) that have Level 11.2 Outside Delivery Type codes of N/A. These N/A Codes are legitimate tallies since they apply to an activity not specific to the deliveries. Examples are personal or break time, administrative, loading, unloading, setup etc.

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There are tallies for Level 11.3 Outside Delivery Type Status that are N/A (4,030 out of 38,557 based on LR-I-337). These N/A Codes are legitimate tallies since they apply to an activity not specific to deliveries. Examples are personal or break time, administrative, loading, unloading, setup etc.

- (b) The reason for collecting delivery type and delivery type status was to collect additional information that might assist us in identifying the conditions of the route. Tallies were grouped by the delivery type code in the work sampling summary reports. The delivery type status code ultimately was not used in any portion of the Engineered Standards or data analysis performed on the data collected.

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ADVO/USPS-T13-123. In response to MPA/USPS-T13-76(c), you state that Level 11.4 Activity Code J04 (Parcels) means that the carrier is handling, delivering, or processing a parcel type of mail.

(a) Please confirm that J04 does not necessarily mean that the carrier was preparing mail to place into a mail receptacle, inserting mail into a receptacle, or handing mail to an addressee at the observed instant of time. If you cannot, please explain why not.

(b) Please confirm that "delivering" as used in your statement is used broadly in the sense that the carrier intends to get the parcels to the addressee and is not intended to mean physically placing the parcels in the addressee's hands or mail receptacle. If you cannot, please explain why not.

RESPONSE:

(a) Confirmed. I note that my response to MPA/USPS-T13-76 (c) could have been clearer. J04 was intended only to relate handling and processing of processing of parcels in the office, not delivery. See my response to MPA/USPS-T13-67 (d). There are four J04, Parcels tallies one of which is assigned to the STS category of Load. The Load scan sequence; Location at Point of Delivery, Delivery Type of Park and Loop, Delivery Type Status of Business Outside, and Activity J04 Parcels; indicates parcel delivery. The remaining three tallies are assigned to Street Support Time. The Street Support scan sequence is Location at Vehicle, Delivery Type of Dismount, Delivery Type Status of N/A, Activity J04 Parcels, and Activity Detail of Mat'l Handling.

(b) Confirmed.

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ADVO/USPS-T13-124. In response to MPA/USPS-T13-57, you state that, when the 6-minute beep occurred, the observer took an instant snapshot of the carrier's activity and scanned in the observation as soon as possible. Please refer to your response to MPA/USPS-T13-36 where you state that the Level 11.4 Activity Code of "Finger @ Delivery" (J12) includes ". the actions of the carrier obtaining the mail while at the delivery point from the hand, and/or arm, and/or satchel, verifying the mail, and depositing the mail." For purposes of your activity sampling data collection:

(a) Please confirm that your MPA/USPS-TI-36 definition differs from the one previously provided in Appendix D. The response includes obtaining mail, verifying the mail, and depositing the mail while the Appendix D definition indicates that only "fingering through the mail to verify the address is correct and collecting the mail to deposit" is observed.

(b) Please confirm that only one of the actions described in (a) above may have been observed at a specific instant of time, when the "Finger @ Delivery" code was scanned. If you cannot, please explain why not.

(c) To your best belief and understanding, were there any other actions that may have also been observed when the "Finger @ Delivery" barcode was scanned? Please explain.

(d) If the code for "Finger @ Delivery" includes the action of depositing the mail, then, to the best of your belief and understanding, please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the "Delivery/Collection" (J08) code. If this may vary by delivery type (e.g., curblane vs. park & loop), please explain fully.

RESPONSE:

(a) Not confirmed. My response in MPA/USPS-T13-36 defining the "Finger @ Delivery" activity could have been more explicit. A more detailed definition of the "Finger @ Delivery" term would be: "...obtaining the mail while at the delivery point from the hand, and/or arm, and/or satchel, verifying the mail, and *collecting the mail from the arm and/or satchel before depositing the mail in the receptacle or at a drop.*" Incidentally, Appendix D contains

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no definitions and is intended to identify general activities and does not define all possible activities at the various Levels 10 through 11.4.1.

- (b) Not confirmed. The actions described above in (a) – obtaining mail, verifying addresses, and collecting mail to deposit continuously occur in one motion. As the carrier is holding letters in the non-dominant hand, (1) one piece of mail is grasped with the dominant hand (2) while reading/verifying the address. After the address is verified, (3) that piece of mail is flipped forward. (1) The next piece of mail is grasped (2) while reading/verifying the address. After the address is verified, (3) that piece of mail is flipped forward. The actions of (1)obtaining, (2)verifying, and (3)collecting mail occur so quickly that it would not be possible to determine which of the three actions was occurring at a specific instant of time.
- (c) Yes. Other actions that may have been observed when the “Finger @ Delivery” barcode was scanned include the carrier obtaining a sample from the satchel or arm, rolling a flat for placement in a mail receptacle, or obtaining a piece of marriage mail or SPR from the satchel or arm.
- (d) With respect to response (a), the action of *depositing* mail is not part of the Finger @ Delivery activity. It is impossible to describe *every* physical routine carrier action that could be observed when “Deliver/Collection” was scanned; however, some of the actions data collectors may have observed when “Delivery/Collection” was scanned include:

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-Delivery: Data collectors may have observed mail deposited in any variety of mail receptacles including 1-handed slams where the carrier can in an upward sweeping motion open the mailbox and deposit the mail in a single downward motion (common on park and loop and/or dismount deliveries); #1, #1 ½, and #2 boxes where a carrier may have to pull down/forward the box door and deposit the mail in the box (common on curblane deliveries); 1-handed slots where the carrier can deposit the mail through a door slot in one motion (common on park and loop and/or dismount deliveries); 2-handed slots where the carrier may have to lift a flap with one hand while depositing mail with the other hand (common on park and loop and/or dismount deliveries); drops where the carrier would hand the mail directly to the customer (can occur on any delivery type); and a central delivery where a carrier would have to open the central unit with an arrow key, deposit mail into the proper 'cells' in the central delivery box/wall unit, close and lock the central unit. Also note the carriers may have been performing other actions such as propping screen doors open, particularly on 1-handed or 2-handed slot deliveries. This type of action would be *observed*, but it was not part of the bar code scan sequence.

-Collection: Data collectors may have observed a variety of actions when carriers collected mail. Customers used many methods of putting out mail to be collected which varied the actions of carriers. Carriers would lift open 1-handed slam box lids and remove mail from inside the box, remove mail that was clipped to the 1-handed slam box with a paper clip

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or clothespin, or just remove mail from inside the 1-handed slam box (common on park and loop and/or dismount deliveries); for #1, #1 ½, and #2 boxes, carriers would pull forward/down the box door, remove any mail to be collected, close the box door, and put down the 'collection' flag on these types of boxes (common on curblane deliveries); carriers may make a collection by removing a plastic USPS tub of 'outgoing' mail from some specified location and replacing it with an empty tub (common on dismount business deliveries). Carriers may collect mail from centralized delivery locations by removing mail from a designated collection point in the centralized delivery area and placing it in a tub that the carrier would take back to the vehicle. The collection points may be one of the 'cells' in the central unit itself labeled 'outgoing'. In this case, the carrier would not need to make any additional actions pertaining to opening central doors since the central door is already open for making deliveries.

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ADVO/USPS-T13-125. In Appendix D, you describe Code J09, Loading, as putting mail into a vehicle. In response to MPA/USPS-T13-105, you state that "Loading is moving trays from a hamper or nutting truck to the rear of the vehicle."

(a) In response to MPA/USPS-T13-109, you state that there were J09 (Loading) tallies where the "data collectors were probably observing a carrier inside the unit either on his way out to load a vehicle, or on his way back in to get more mail to load the vehicle." Please confirm that, according to your definition, such tallies do not accurately record the observed instant of time as a Loading activity.

(b) Please confirm that there are code J09 Loading tallies at Level 10 Relay Box (L 11) locations. If you cannot, please explain why not.

(c) Please confirm that there are code J09 Loading tallies at Level 10 Park Point (L09) locations. If you cannot, please explain why not.

(d) Please confirm that there are code J09 Loading tallies at Level 10 Miscellaneous (L15) locations, where (per your response MPA/USPS-T13-63) Miscellaneous locations are such areas as elevators, phone booths, supervisor's desks, customer's lawn, locked keys in vehicle, in vehicle parking lot due to no work. If you cannot, please explain why not.

(e) Please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the "Loading" (J09) code. If you cannot, please so state.

RESPONSE:

(a) Not confirmed. Appendix D is intended to identify general activities and does not necessarily *define* all possible activities at the various levels 10 through 11.4.1. My MPA/USPS-T13-109 response is not a definition of "In Unit Walking" or "Loading", but an explanation of what the data collectors might have observed when the tallies (2 tallies of 1072 "J09 Loading" tallies) were taken. Therefore, the tallies *do* accurately record the observed instant of time during the Loading process. To scan any other Location than "In Unit

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Walking" when the carrier is walking in the unit during the loading process would be incorrect.

- (b) Confirmed. There are 19 (of 1072 total Loading tallies) J09 Loading tallies at Level 10 Relay Box (L11) locations. The Loading activity involves moving mail (tubs, trays, satchels, etc.) and can occur at different locations
- (c) Confirmed. There are 2 (of 1072 total Loading tallies) J09 Loading tallies at Level 10 Park Point (L09) locations. The Loading activity involves moving mail (tubs, trays, satchels, etc.) and can occur at different locations
- (d) Confirmed. There are 3 (of 1072 total Loading tallies) J09 Loading tallies at Level 10 Miscellaneous (L15) locations. In checking the observer comments for the 3 J09 Loading tallies at Miscellaneous (L15) locations, we have found: Carriers in vehicle parking lots walking to/from vehicles and a carrier in the station loading catalogues onto cart. The Loading activity involves moving mail (tubs, trays, satchels, etc.) and can occur at different locations
- (e) The "Loading" (J09) code is scanned during the loading *process*. It is impossible to describe every physical carrier action that could be observed when "Loading" is scanned. However, the loading process is considered to start when the carrier begins walking toward the exit doors usually with a hamper, cart, nutting truck, satchel, etc. and finish when the carrier returns an empty hamper, cart, nutting truck, satchel, etc. to a designated location and is in the vehicle ready to depart the station (on motorized routes). The loading process may include multiple trips to and from the vehicle. The loading process may also take place at various times. For example, if the carrier has

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a high volume of parcels that are taking up excess space in the workstation or hamper, the carrier may elect to load those parcels into the vehicle earlier in the morning.

Some of the actions data collectors may observe when "Loading" (J09) is scanned include: Carriers pushing and/or handling hampers/carts/nutting trucks in the unit, on the dock, in the vehicle parking lot, or up to the rear and/or side of the vehicle on the way to/from vehicle to load mail into the vehicle; or carriers at the vehicle and/or dock loading mail into the vehicle and arranging trays/tubs/parcels. These activities usually occur during the loading process at the unit, but can also occur on route if additional mail is brought out to the carrier. On foot routes, carrier actions observed for "Loading" (J09) may include opening/closing a relay bag, removing/returning a relay bag, removing mail from a relay bag and loading the satchel with mail from the relay bag, or locking/unlocking a relay box door.

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ADVO/USPS-T13-126. In response to MPA/USPS-T13-105, you state that "Setup" (Activity Code J11) is "loading the satchel or moving trays to the front of the vehicle." Please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the "Setup" (J11) code.

RESPONSE:

Setup (J11) includes various actions depending on the circumstances. With respect to vehicles, setup includes, but is not limited to, unlocking and opening the cargo door, unlocking and opening non-driver-side door, removing empty trays to cargo area, moving full trays to the front of the vehicle, shutting and locking non-driver-side door, shutting and locking cargo door, and returning to the vehicle. Part of the vehicle setup is rearranging the parcels to facilitate delivery.

Setup also applies to preparing the satchel for park and loop routes and foot routes with relay boxes. The carrier unlocks and opens the cargo door, places mail into the satchel for the loop, loads mail onto arms and hands, shuts and locks the cargo door. At relay boxes, the carrier unlocks and opens the relay box, places mail into the satchel, loads mail onto arms and hands, shuts and locks the relay box.

Setup can also apply to the actions associated with moving mail to a central delivery unit and arranging tubs of mail at the unit. These units are at facilities such as office buildings or large apartment complexes. There may be

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other activities that I have not described, but the above should cover the vast majority.

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ADVO/USPS-T13-127. In Appendix D, you describe Activity Code J10, Unloading, as "Taking empty trays, tubs, collected mail etc. out of vehicle typically at the end of day."

(a) Please confirm that there are Code J10 Unloading tallies at both Level 10 Collection Box (L10) and Relay Box (L11) locations. If you cannot, please explain why not.

(b) Please confirm that there are code J10 Unloading tallies at Level 10 Miscellaneous (L15) locations, where (per your response MPA/USPS-T13-63) Miscellaneous locations are such areas as elevators, phone booths, supervisor's desks, customer's lawn, locked keys in vehicle, in vehicle parking lot due to no work. If you cannot, please explain why not.

(c) Please confirm that there are code J10 Unloading tallies at Level 10 Park Point (L09) locations. If you cannot, please explain why not.

(d) Please identify every routine physical carrier action that you believe your data collectors may have been observing when they scanned the Unloading" (J10) code. If you cannot, please so state.

RESPONSE:

- (a) Confirmed. There are 2 (of 427 total Unloading tallies) J10 Unloading tallies at Level 10 Collection Box (L10) locations and 4 (of 427 total Unloading tallies) J10 Unloading tallies at Level 10 Relay Box (L11) locations. The Collection Box (L10) location tallies may apply when the carrier removes the tub(s) of collected mail in bulk from the collection box. The Relay Box (L11) location tallies are associated with Foot routes in which vehicles are not used. Thus, the unloading activity will occur at a Relay Box location. The Unloading activity involves moving mail (tubs, trays, satchels, etc.) and can occur at different locations**
- (b) Confirmed. There are 9 (of 427 total Unloading tallies) J10 Unloading tallies at Level 10 Miscellaneous (L15) locations. In checking observer**

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comments for these J10 Unloading tallies at Miscellaneous locations, we have found: Carriers unloading collected mail, usually into a hamper designated for collected mail (location of this hamper or other designated location for collected mail varies among stations); carriers retrieving and returning empty tubs, trays, carts, hampers, etc. to/from a specified location at the station. The Unloading activity involves moving mail (tubs, trays, satchels, etc.) and can occur at different locations.

- (c) Not Confirmed. In checking observer comments for the 1 (of 427 total Unloading tallies) J10 Unloading tally at Level 10 Park Point (L09) locations, we have found this work sampling scan was edited incorrectly and should have a Level 10 Vehicle (L08) location code. This work-sampling tally is classified as Street Support Time STS Type in LR-I-163 as are the J10 Unloading tallies at Level 10 Vehicle (L08) locations. The Unloading activity involves moving mail (tubs, trays, satchels, etc.) and can occur at different locations
- (d) The "Unloading" (J10) code is scanned during the unloading *process*. It is impossible to describe *every* physical carrier action that could be observed when "Unloading" is scanned. However, the unloading process is considered to start when the carrier has returned to the station and begins gathering empty satchels/trays/tubs, collected mail, and/or missorted/undelivered mail (the carrier may do this from inside or outside of the vehicle) and finish when the carrier has returned empty satchels/trays/tubs and collected mail to designated locations and has

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locked and secured the vehicle (for motorized routes). The unloading process may include multiple trips to and from the vehicle. The unloading process may also take place at various times. For example, if the carrier returns to the station at some point in the day to pick up additional mail, some portion of the unloading process may take place at this time.

Some of the actions data collectors may observe when "Unloading" (J10) is scanned include: Carriers pushing and/or handling hampers/carts/nutting trucks in the unit, on the dock, in the vehicle parking lot, or up to the rear and/or side of the vehicle on the way to/from vehicle to load mail into the vehicle; carriers at the vehicle and/or dock loading mail into the vehicle and arranging trays/tubs/parcels; carriers handling collected mail, and/or missorted/undelivered mail. These activities usually occur during the unloading process at the unit, but can also occur on route if additional mail is brought out to the carrier and the carrier unloads empty trays or tubs into another vehicle. On foot routes, carrier actions observed for "Unloading" (J10) may include opening/closing a relay bag, removing/returning a relay bag, removing mail from a relay bag, or locking/unlocking a relay box door.

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ADVO/USPS-T13-129. In response to MPA/USPS-T13-80, you state that the Code H activity details (i.e., mail receptacles) describe the receptacle or collection box , (X%X the carrier. Please confirm that these codes do not necessarily mean the carrier was physically handling a receptacle at the instant of time observed. If you cannot, please explain why not.

RESPONSE:

Confirmed.

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ADVO/USPS-T13-130. For the Code K activity details (i.e., Jeep, LLV, Walking, Walk Flat, etc.), please provide your belief as to the observers' interpretation of the following:

(a) Did any of the vehicle codes (i.e., Jeep, LLV, 1 or 2 ton truck, pickup/van, bus, automobile, elevator) mean the carrier is physically inside or moving the vehicle, doing something with the vehicle (i.e., locking it or pulling mail out of the back), or simply near the vehicle? Please explain.

(b) What were the differences among the "Walking" (K09), "Walk Flat" (K10), and "Walk Obstructed" (K11) codes?

RESPONSE:

(a) Yes, the vehicle codes (i.e., Jeep, LLV, 1 or 2 ton truck, pickup/van, bus, automobile, elevator) could mean that the carrier was physically inside the vehicle, doing something with the vehicle, or moving the vehicle. The entire scan sequence needs to be reviewed to determine what activity is occurring. The most common occurrence is traveling in the vehicle. Also at the vehicle are the occurrences of setup, loading and unloading and/or the occurrence of delays (i.e., vehicle breakdown), in which the carrier may be near the vehicle, but not inside it.

(b) Walking (K09) was applicable for all walking during Phase 1. There are 841 tallies, the latest tally dated 2/13/97, in the data provide to Witness Baron that are coded as K09, Walking. In Phase 2 the walking code was expanded into two separate walking codes K10, Walk Flat and K11, Walk Obstructed. Walk Flat (K10) is for walking when the terrain is primarily flat. Walk Obstructed (K11) is for walking that is obstructed in some way, requiring the carrier to

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modify stride length. For example, carriers walking up a flight of stairs, or through shrubbery, down an embankment on wet leaves.

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ADVO/USPS-T13-133. Interrogatories MPA/USPS-T13-86 and 99 provided lists of types of tallies grouped by the STS categories to which they had been assigned, and asked you to explain why you assigned them to the particular STS category. You declined to respond on the ground that "I cannot respond without references to the specific records in question, including CY code, route ID, date, etc." As an alternate approach to help understand in general terms your assignments of various types of tallies to STS categories (including the tally types listed in MPA-86 and MPA-99) please refer to your testimony at page 14 where you discuss your initial manual assignment of STS categories to the tallies, followed by your creation of a "master list" of scan sequences grouped by STS category, which you state was used "to crosscheck the manual review process." In response to ADVO/USPS-T13-22(c) which asked you to provide the master list of scan sequences, you responded "Please refer to Appendix D and Appendix F of my testimony."

(a) Please confirm that Appendix D does not contain the "master list" of scan sequences grouped by STS category, because it does not contain any information about STS categories.

(b) Please refer to Appendix F and the table below. This table lists, for each STS category, the "Locations" shown in your Appendix F (in the second column) compared to the "Locations" that are found in the LR I-163 database (in the third column). Please confirm that this is an accurate list of the Locations by STS category shown in Appendix F and appearing in LR I-163. If you cannot confirm, please explain why not.

(c) Please confirm that some of the locations that appear in LR I-163 but not in your Appendix F also appear on the MPA interrogatories (e.g., MPA/USPS-T13-86w), (qq), (ww)).

(d) Please explain why the location information by STS category in Appendix F differs from the location information in the LR I-163 database.

STS Categories	Locations Listed In USPS-T-13 Appendix F	Locations Included In LR I-163
Load Time	On Route Point of Delivery Vehicle	On Route Point of Delivery Vehicle Park Point Other Route Miscellaneous In Vehicle at Stop N/A
Street Support Time	Dock Gas Station	Dock Gas Station

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	Vehicle PBL On Route Relay Box Park Point Collection Box Miscellaneous	Vehicle PBL On Route Relay Box Park Point Miscellaneous In Unit Walking In Vehicle at Stop Vehicle Traffic N/A Point of Delivery Wait When Walking
Driving Time	Vehicle In Vehicle at Stop On Route Park Point Miscellaneous	Vehicle In Vehicle at Stop On Route Park Point Miscellaneous Wait When Walking
CAT	Vehicle In Vehicle at Stop On Route In Vehicle Traffic Miscellaneous	Vehicle In Vehicle at Stop On Route In Vehicle Traffic Miscellaneous Other Route Point of Delivery
FAT	On Route Miscellaneous Wait While Walking	On Route Miscellaneous Wait While Walking Vehicle Park Point
Collection	Collection Box	Collection Box Miscellaneous On Route

RESPONSE:

(a) Confirmed to the extent that Appendix D is not grouped by STS category.

Appendix D does contain a master list of all possible scan sequences of level 10 through level 11.4.1 codes presented to witness Baron.

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- (b) Confirmed. Note that the column in ADVO/USPS-T13-133 contains a location listed as "Miscellaneous". Actually this is listed in USPS-T13 Appendix F as "Misc." and "Misc".
- (c) Confirmed.
- (d) I have created an Access query to look-up the individual tallies associated with each location and I also referenced various hardcopies. In reviewing LR-I-163, I find in the STS Load Time category:

One tally with a location of "Park Point". The activity of "Del/Coll."(deliver and collect) requires the load time classification.

Three tallies with an "Other Route" location. The activity of "Del/Coll."(deliver and collect) required the load time classification on two tallies. The remaining tally activity of accountable and activity detail of drop to cust (drop to the customer) required the load time classification.

Two tallies with a "Misc." location. The activity of delay specify details and the activity details on the two tallies are excess words cust (excess words from the customer) and public relations. These are clearly load time classifications.

One tally with an "In Vehicle at Stop" location. The activity of delay specify details and the activity of directions (a customer asking the carrier for directions). This is clearly a load time activity.

Two tallies with a location of N/A. The activity of "Del/Coll."(deliver and collect) requires the load time classification.

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Only nine tallies of the 39046 tallies in LR-I-163 contain a location not mentioned in Appendix F for load time. The nine tallies represent 0.023 percent of the data.

In reviewing LR-I-163, I find in the STS category for Street Support Time:

Two tallies with "In Unit Walking" as the location. The activity in both of these tallies is "Loading". The carrier is preparing to load the vehicle. This is clearly street support time.

Twelve tallies with "In Vehcl at Stop" (in the vehicle at a stop) location. In all cases the activity of "Travel to 1 deliver" (travel to first delivery point) or "Return to Unit" (return to the post office) clearly defines street support time.

Two tallies with a "In Vehcl Traffic" (in the vehicle in traffic) location. In both cases the activity of "Travel to 1 deliver" (travel to first delivery point) or "Return to Unit" (return to the post office) clearly defines street support time.

One tally with a "N/A" location. The activity for this tally is "Unloading" (unloading the vehicle) and the activity detail of "LLV", confirms the carrier is unloading the vehicle. This is clearly a street support activity.

Four tallies with a "Point of Deliver" location. One of the four has an activity of "Return to Unit". The activity is defined in the street support category. The remaining three tallies have the activity of "Setup". The setup activity is defined as rearranging or restocking the satchel. This is consistent with the street support category.

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Two tallies with a "Wait when Walkg" (wait while walking) location. The activity for one of the tallies is "Travel to 1 Deliver"(traveling to the first delivery). This is clearly street support time. The other tally activity is "No Work". This was assigned the street support category because the activity does not fit the other STS categories.

Only twenty-three tallies of the 39046 tallies in LR-I-163 contain a location not mentioned in Appendix F for street support. The tallies represent 0.059 percent of the data.

In reviewing LR-I-163, I find in the STS category for Driving Time:

Two tallies with the location as "Wait when Walkg" (wait while walking). One of the tallies has the activity detail as "Bus-Public". The tally is defined as the carrier waiting for a bus. This was assigned to Driving time because the carrier is using public transportation as a means between deliveries. The other tally has the activity of "Traffic/Detour" and the activity detail of "Construction". This was changed in to Route/Access (FAT).

Only two tallies of the 39046 tallies in LR-I-163 contain a location not mentioned in Appendix F for driving time. The tallies represent 0.005 percent of the data.

In reviewing LR-I-163, I find in the STS category for Route/Access (CAT):

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Two tallies with a location of "Other Route". In both cases the activity is "Travel B/t Deliver" (traveling between deliveries) and the delivery type is a curb. The tallies are clearly Route/Access (CAT).

Two tallies with a location of "Point of Deliver". In both cases the activity is "Travel B/t Deliver" (traveling between deliveries) and the delivery type is a curb. The tallies are clearly Route/Access (CAT).

Only four tallies of the 39046 tallies in LR-I-163 contain a location not mentioned in Appendix F for route/access CAT. The tallies represent 0.01 percent of the data.

In reviewing LR-I-163, I find in the STS category for Route/Access (FAT) Time:

One tally where the location is "Park Point". The activity is "Travel B/t Deliver" (traveling between deliveries) and the activity detail is "Walking". This is clearly Route/Access (FAT).

Seven tallies with a location of "Vehicle". In one tally the activity of "Travel B/t Deliver" and the activity detail of "Elevator – Passn" (passenger elevator) on a "Foot" route, is clearly Route/Access (FAT). One tally the delivery type is "Park & Loop" the activity is "Accountable" and the activity detail is "Jeep". The carrier is at the jeep preparing a form prior to delivering an accountable. The remaining five tallies are for a "Dismount" delivery. The activities are "Parcel", "Accountable", "N/A" and "Delay – Specify". The activity detail of "Mat'l Handling" defines the carrier is rearranging mail at the vehicle and should be street support. The activity detail of "Jeep" and "N/A" with the parcel and accountable is

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delivering the parcel or accountable. Because the carrier is not listed as the point of delivery and on a dismount, the carrier is walking to deliver the parcel or accountable. The last tally has an activity of "Delay – Specify" and an activity detail of "Jeep". This tally was assigned to the (FAT) category because of the dismount delivery type.

Only eight tallies of the 39046 tallies in LR-I-163 contain a location not mentioned in Appendix F for route/access FAT. The tallies represent 0.02 percent of the data.

In reviewing LR-I-163, I find in the STS category for Collection Time:

A total of three tallies contain the location of "on Route" or "Misc." In all three cases the activity of "Wait 4 Collectn" (waiting for collection) describes the carrier waiting for the time when the collection is scheduled to occur. The tallies clearly belong in collection time.

Only three tallies of the 39046 tallies in LR-I-163 contain a location not mentioned in Appendix F for collection time. The tallies represent 0.007 percent of the data.

Only 49 total tallies of the 39046 presented to witness Baron where not included in the location column in Appendix F. The 49 tallies represent .125 percent of the total tallies, in other words 99.875 percent of the tallies are represented by the location column in Appendix F. For my intent, I feel Appendix F is an acceptable master list.

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ADVO/USPS-T13-134. Please refer to the preceding interrogatory and Appendix F to your testimony. The table below lists, for each STS category, the "Activities" shown in your Appendix F (in the second column) compared to the "Activities" that are found in the LR I-163 database (in the third column). Locations Listed in Locations Included in STS Categories USPS-T-13 Appendix F LR I-163

(a) Please confirm that this is an accurate list of the Activities by STS category shown in Appendix F and appearing in LR I-163. If you cannot confirm, please explain why not.

(b) Please confirm that some of the Activities that appear in LR I-163 but not in your Appendix F also appear on the MPA interrogatories (e.g., MPA/USPS-T13-86(kk), (ww); MPA/USPS-T13-99(n), (aa), (bb), (cc), (gg), (kk), (tt)).

(c) Please explain why the Activities information by STS category in Appendix F differs from the Activities information in the LR I-163 database.

STS Categories	Activities Listed in USPS-T-13 Appendix F	Activities Included in LR I-163
Load Time	Delivery/Collection Parcel Finger @ Delivery Setup Accountable Delay Specify	Delivery/Collection Parcel Finger @ Delivery Setup Accountable Delay Specify N/A Delay Specify Detail Walking Hardship No Access to Box Travel Between Deliveries Travel Between Deliveries with Sort
Street Support Time	Loading Unloading Setup Travel to 1 st Delivery Return to Unit Delay Specify	Loading Unloading Setup Travel to 1 st Delivery Return to Unit Delay Specify Delay Soecify Detail Delivey/Collection N/A

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		Walking Mix Travel Between Deliveries No Work Wait 4 Collection Parcels Mix
Driving Time	Travel Between Deliveries Traffic/Detour Delay Vehicle Breakdown Setup	Travel Between Deliveries Traffic/Detour Delay – Specify Vehicle Breakdown Parcel Travel to First Delivery N/A Delay Specify Detail Accountable Delivery/Collection No Access to Box Weather
CAT	Travel Between Deliveries Traffic/Detour Delay Specify	Travel Between Deliveries Traffic/Detour Delay Specify Vehicle Breakdown Delay Specify Detail Parcel Accountable N/A Weather
FAT	Travel Between Deliveries N/A Accountable Parcel	Travel Between Deliveries N/A Accountable Parcel Delay Specify Walking No Work No Access to Box Travel Between Deliveries with Sort Travel to 1 st Delivery
Collection	Delivery/Collection Setup Unloading Wait for Collection	Delivery/Collection Setup Unloading Wait for Collection

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RESPONSE:

- (a) Confirmed, except for the column in ADVO/USPS-T13-134 containing activity listed as "Travel to 1st Delivery". Actually this is listed in USPS-T13 Appendix F as "Travel to 1st".
- (b) Confirmed.
- (c) I have created an Access query to reference the individual tallies or group of tallies associated with each activity.

In reviewing LR-I-163, I find in the STS category for Load Time:

Thirteen tallies where the activity is "N/A". Nine tallies have a location of "Point of Deliver" (point of delivery). This location is consistent with the load time definition. Two tallies with a location of "Vehicle" and an activity detail of "Public Relations". One tally with a location of "On Route" and an activity detail of "Public Relations". The activity detail is consistent with the load time definition. The final tally location is "On Route" and the activity detail is "Central Inside". The carrier is at a central inside mailbox.

Eighty two tallies where the activity is "DelaySpcfyDetail" (delay specify details). Seventy-eight of the tallies contain the activity detail of "Excess Words Carr", "Excess Words Cust", "Public Relations", "Service Rates" or "Directions". The tallies' detail the carrier or the customer having a conversation that delays the carrier. This is clearly the load time function of "incidental customer contacts". The remaining three tallies have a location of "Point of Deliver" and is clearly a load time function.

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Ten tallies contain the activity of "Walking". Five of the ten have a location of "Point of Deliver". The location of point of delivery is consistent with the load time definition. Five of the tallies have a location of "On Route" and a delivery type of "Dismount". These tallies should be changed to Route/Access (FAT).

Ten tallies contain the activity of "Hardship". Hardship is described as the carrier making contact with a customer. The load time definition of "incidental customer contacts" describes this activity.

Six tallies contain the activity of "No Access to Box". Four of the tallies have a location of "Point of Deliver". These tallies are classified as load time. One of the tallies has a location of "Point of Deliver" and the activity detail of "Parking Unavail". This tally should be classified as Route/Access (CAT). The final tally has the carrier location at the "Vehicle". With the delivery type of curb and no access to the mailbox, this one tally should be classified as Route/Access (CAT).

Thirty-two tallies have an activity of "Travel B/t Deliver". Thirty of the tallies have a location of "Point of Deliver". The remaining two tallies have the location as "Vehicle", and the activity detail of "Drop to Cust", these are consistent with the load time definition of "incidental customer contacts". In the ten tallies where the delivery type is curb and the location of point of delivery, the activity was ignored and the load time classification assigned. The six tallies where the delivery type is dismount and the location is point of delivery the activity was ignored and the load time classification assigned. The two tallies where the delivery type is dismount and the location is point of delivery and the

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activity detail is "# 1 Box" the load time classification was assigned. For the one tally where the location is point of delivery and the delivery type is park and loop with the activity detail of "1 Hand Slam" the load time classification is assigned and the activity is ignored. For the one tally where the location is point of delivery, the delivery type is dismount and the activity detail of "Drop to Cust", the load time definition applies using "incidental customer contacts". For the one tally where the location is point of delivery and the delivery type is central with the activity detail of "Central Outside" the load time classification is assigned and the activity is ignored. For the one tally where the location is point of delivery and the delivery type is park and loop the load time classification is assigned and the activity is ignored. For the remaining eight tallies the activity detail supports the activity of walking and the category should be changed to Route/Access (FAT).

Two tallies contain the activity of "Travel B/t w/sort". The activity detail of the two tallies is "Walk Flat". These two tallies should be changed to Route/Access (FAT).

In reviewing LR-I-163, I find in the STS category for Street Support Time:

Nine tallies with the activity of "DelaySpcfyDetail". Three tallies contain the location of "Gas Station". Since the activity of refueling the vehicle is to occur on the way to the first delivery or returning to the unit, the three tallies are clearly Street Support. Three tallies contain the activity details of "Public Relations" and "Directions" as discussed in ADVO/USPS-T13-133; these tallies should be changed to load time. The one tally containing the activity detail of "Excess Wrds

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Carr" occurred at the location of "Dock" and is assigned to street support because the carrier has not left the postal unit. The remaining three tallies contain a personal and administrative detail of "Super. Instruct". This is the activity of the carriers' supervisor providing instructions to the carrier. The street support category was assigned as the logical choice for this type of activity.

The forty-three tallies that contain the activity of "Del/Coll." (delivery or collection) all have a location of "Relay Box". The location of relay box clearly is defined in the street support category.

There are 1836 tallies with the activity of "N/A". Of these tallies 1716 or 93.5 percent have the location of "PBL" (the carriers' personal or break time while on the street). The only place to assign the PBL locations is street support. Ninety-one of the remaining tallies have a location of "Gas Station". As previously discussed, the gas station location is an indicator that the carrier is traveling to the first delivery or returning to the unit. These tallies are clearly in the street support category. Twenty tallies have a location of "Dock". The carrier is at the dock of the postal unit, clearly part of the street support category as previously discussed. Five tallies contain the personal and administrative activity of supervisor instructions and are included in street support as discussed above. Two tallies contain the location of "Relay Box" and are assigned the street support category as discussed above. Two tallies contain in the personal and administrative level the "Other - Specify" activity. These two tallies are assigned street support because no other category applies.

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There are thirty-four tallies that contain an activity of "Walking". In all cases the location of "Dock" defines the carrier at the dock of the postal unit. As previously discussed the street support category is assigned.

There are four tallies with an activity of "Mix". In all cases the activity detail is "Mat'l Handling" (material handling). The carriers' location is at the "Dock" or at the "Vehicle". The activity detail of material handling is handling mail in bulk on the dock or at the vehicle, and is clearly applied to the street support category.

There are six tallies that contain an activity of "Travel B/t Deliver". Three of the tallies contain the locations of "Dock", "Gas Station" and "Relay Box"; the street support category is assigned as previously discussed. The remaining two tallies that contain the location of "Vehicle" and the activity detail of "LLV" or "Jeep" should be changed to driving time. The final tally contains the location of "Vehicle" and an activity detail of "Walk Flat" should be changed to Route/Access (FAT).

There are sixteen tallies that contain the activity of "No Work". Fourteen of the tallies describe the carriers' locations as "On Route" and the delivery type as "Foot". The activity of no work describes the carrier delayed on the route and is assigned to the street support category because no other category applies. One of the remaining tallies has a carrier location as "Dock", as is assigned the street support category discussed earlier. The final tally describes the carrier location as "Wait when Walkg". Again the carrier is delayed on the route and the street support category is assigned.

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There is one tally containing the activity of "Wait 4 Collectn". The carriers' location in this tally is a "Relay Box". The street support category is assigned as discussed previously.

There are three tallies with the activity of "Parcels". The activity detail contains "Mat'l Handling"(material handling) and is assigned the street support category as discussed previously.

With the exception of the "N/A" activity, of which most of the tallies were "PBL", a total of 120 of the 39046 or 0.30 percent of the tallies in LR-I-163 contain activities that are not in Appendix F.

In reviewing LR-I-163, I find in the STS category for Driving Time:

There are twelve tallies where the activity contains "Parcel". In eleven of the twelve the activity detail is "LLV" and the locations are "On Route" or "Vehicle". In these eleven tallies the detail confirms that the carrier is still in the LLV. The remaining tally has an activity detail of "Drop to Cust" and should be re-classified to load time.

There are only two tallies where the activity is "Travel to 1 Dlvr"(travel to first delivery). In both cases the STS category should be re-classified to street support.

There are forty-eight tallies of the 39046 tallies in LR-I-163 with the activity of "N/A".

There are two tallies of the 39046 tallies in LR-I-163 where the activity is "DelaySpckyDetail"(delay specify details). In one tally the activity detail contains

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"Excess Words Cust". This tally should be changed to load time due to "incidental customer contacts" as mentioned previously. The other tally contains "Super Instruct" in the personal and administrative level and should be changed to street support.

There are three tallies of the 39046 tallies in LR-I-163 where the activity is "Accountable". Two of the tallies have a location of "Vehicle" and an activity detail of "LLV". The tallies were assigned driving time due to the location and the activity detail. The remaining tally contains the activity detail of "Drop to Cust" and should be changed to load time as previously discussed.

There are five tallies of the 39046 tallies in LR-I-163 that contain "Del/Coll" in the activity level. In all cases the carriers' location is "Vehicle" and the activity detail is "LLV". In all cases the tallies should be changed to load time.

There is one tally of the 39046 tallies in LR-I-163 that contains "No Access to Box" in the activity level. The location is "Vehicle" and the activity detail is "LLV". The tally is assigned to driving time because the carrier is in the LLV and is attempting to get access to the mailbox.

There are four tallies of the 39046 tallies in LR-I-163 that contain an activity of "Weather". The location is "Vehicle" and the activity detail is "LLV". The carrier is delayed while in the LLV by the weather. This is driving time.

A total of seventy-seven of the 39046, or 0.19 percent, of the tallies in LR-I-163 contain activities that are not in Appendix F.

In reviewing LR-I-163, I find in the STS category for Route/Access (CAT) time:

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There are two tallies of the 39046 tallies in LR-I-163 containing the activity of "Vehicle Breakdown". In both cases the delivery type is curb. The carriers' location is in the "Vehicle" or in the vehicle at stop. The tallies are assigned to CAT due to the delivery type of curb.

There are six tallies of the 39046 tallies in LR-I-163 that contain the activity of "DelaySpcfyDetail". In all cases the delivery type is curb, in three tallies the location is "Vehicle" and in three tallies the location is "Misc". These were assigned the "CAT" category due to the delivery type of curb and the carrier being delayed on the route.

There are twenty tallies of the 39046 tallies in LR-I-163 with an activity of "Parcel". In eighteen of the tallies the carriers' location is in the "Vehicle" and the activity detail is "LLV" and the delivery type is curb. The "CAT" category is assigned because of these factors. The remaining two tallies contain a location of "On Route" with the delivery type of curb. The "CAT" category is assigned because of these factors.

There are five tallies of the 39046 tallies in LR-I-163 containing the activity of "Accountable". In all cases the carriers' location is in the "Vehicle" and the delivery type is curb. The "CAT" category is assigned because of these factors.

There are forty-six of the 39046 tallies in LR-I-163 containing the activity "N/A". In all cases the delivery type is curb. Thirty-seven of these tallies have a location of "Vehicle". Two tallies have a location of "On Route" and the balance contain "Misc". The activity detail in all cases contains "N/A", "LLV" or "1or 2 Ton Truck". The "CAT" category is assigned because of these factors.

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There is one tally of the 39046 tallies in LR-I-163 containing an activity of "Weather". The delivery type for this tally is curb. As mentioned previously the "CAT" category is assigned because the carrier is delayed on a curb route by the weather.

A total of eighty of the 39046 tallies, or 0.2 percent of tallies in LR-I-163 contain activities that are not in Appendix F.

In reviewing LR-I-163, I find in the STS category for Route/Access (FAT) time:

There are twenty-eight tallies of the 39046 in LR-I-163 containing an activity of "Delay – Specify". In all cases the delivery type is not curb. In all cases the carriers' location is "Misc.", "Vehicle" or "On Route". The "FAT" category is applied because the carrier is delayed on a non-curb type route.

There are 145 tallies of the 39046 tallies in LR-I-163 containing the activity "Walking". In all cases but one, the carries' location is "On Route". In all cases the delivery type is not curb. This is clearly the definition for the "FAT" STS category. The remaining tally has a location of "Misc" and the activity detail is "Walk Flat". Also, clearly the STS category of "FAT" can be applied.

There are two tallies of the 39046 in LR-I-163 containing the activity of "No Work". The delivery type in the two tallies is park and loop. The carriers' location is "Misc.". The carrier is delayed on a park and loop type route due to lack of work. The "FAT" category was assigned.

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There are two tallies of the 39046 in LR-I-163 with an activity of "No Access to Box". In both cases the carrier is on a non-curb type route. The carriers' location is "On Route". Clearly the "FAT" category can be applied.

There are 1394 tallies of the 39046 in LR-I-163 containing the activity "Travel B/t w/sort". In all cases the location of the carrier is "On Route" and is supported further by the activity details of "Walking", "Walk Flat", "Walk Obst." or "Walkg Push Cart". Again the tallies clearly are Route/Access (FAT).

There are three tallies of the 39046 in LR-I-163 containing the activity "Travel to 1 Deliver". The carriers' location is "On Route" and the activity detail of "Walking" supports the activity. These tallies should be re-classified to street support.

In all cases where a STS category change has been mentioned, the change is so minor and will not affect the percentage used by witness Baron.

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ADVO/USPS-T13-136. Please refer to MPA/USPS-T13-104. You state that lunch break tallies were deleted from the databases provided to witness Baron. It appears that tallies for other personal break observations were also deleted prior to the activity sampling data being converted to the LR I-163 data set.

- (a) Please confirm that other personal break tallies were also deleted.**
- (b) Were any other types of out-of-office tallies also deleted? If so, please explain fully.**
- (c) Please explain how one can determine from the LR I-163 data set the extent to which carriers took lunch or other personal breaks.**
- (d) Please explain how one can determine from the LR I-163 data set the number of workhours the carriers spent out-of-office.**

RESPONSE:

- (a) Not Confirmed. To my knowledge, no other break tallies other than lunch tallies, were excluded from the route days provided to witness Baron.**
- (b) To my knowledge, no other break tallies other than lunch tallies, were excluded from the route days provided to witness Baron.**
- (c) The lunch tallies were provided in LR-I-316. In general all other break tallies are included and should have a location of "PBL".**
- (d) In general the number of hours can only be estimated. The time associated with the first scan of the route day in LR-I-163 and the difference in the time associated with the last scan of the route day in LR-I-163 should estimate the hours spent out-of-office.**


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: 5-23-00

CERTIFICATE OF SERVICE

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


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
May 23, 2000