

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 MPA INTERROGATORIES
(MPA/USPS-T13-117, 121, 122, 124, 126, 127)
(May 31, 2000)

The United States Postal Service hereby provides the response of witness
Raymond to the following interrogatories of the Magazine Publishers of America:
MPA/USPS-T13-117, 121, 122, 124, 126, 127, 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 31, 2000

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MPA/USPS-T13-117. MPA/USPS-T13-89 and your response were as follows:

MPA/USPS-T13-89. For the "On Route" location, there are some "Travel B/t Dlvr." activity tallies with Walking Push Cart detail. Some of these are assigned to the Drive Time category and some are assigned to the FAT Run Time category. Separately, there are some "Walking" and "Travel B/t Dlvr. w/Sort" activity tallies with "Walking Push Cart" detail assigned to the FAT Run Time category. For each of these tally types, please explain:

- (a) What were the data collectors observing at those times and how do you know it?
- (b) How did you decide to assign those tallies to STS categories?

RESPONSE: I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

1. For tallies that identify the carrier's location as "On Route," the activity as "Travel B/t Dlvr.," and the activity detail as "Walk Push Cart" (code K04), please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time. If additional kinds of tally information not contained above are needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.
2. Please explain how you determined whether such tallies in (1) above should be allocated to the Drive Time or FAT Run Time category. Provide any decision rules you used and explain their bases.
3. For tallies that identify the carrier's location as "On Route," the activity as "Walking" or "Travel B/t Dlvr. w/Sort," and the activity detail as "Walk Push Cart" (code K04), please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time. If additional kinds of tally information not contained above are needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.
4. Please explain how you determined whether such tallies in (3) above should be allocated to the FAT Run Time category. Provide any decision rules you used and explain their bases.

RESPONSE:

The following responses are based on LR-I-337 developed to support my responses to ADVO/USPS-T13-38 and 69.

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1. For tallies that identify the carrier's location as "On Route", the activity as "Travel B/t Dlvr.", and the activity detail as "Walk Push Cart (code K04)" (114 tallies of 38,557 total tallies in LR-I-337), the data collector observed the carrier walking between points of delivery that are either inside or outside a residential or business delivery, while pushing a cart. Although the additional bar code Levels (11.1, 11.2, and 11.4) are not required for an understanding of this tally, the remaining personal or administrative level, delivery type level, and delivery type status level provide additional supporting information about the observation and the choice of "Route/Access (FAT)". Identifying specific records with tally details including CY Code, route ID, date, etc. assists in understanding tallies in question for research purposes. Having tally details such as CY Code, route ID, and date is necessary when researching hard copy documentation associated with a specific tally. Also, having the specific tallies you were questioning would reduce my chances of providing a misleading response and reduce the effort required to query the database and possibly misidentify the requested information and associated tallies.
2. These tallies, "On Route", "Travel B/t Dlvr.", and "Walk Push Cart" are all assigned to the Route/Access (FAT) category. None are assigned to Driving Time. Refer to the response to Presiding Officer's Information Request No. 8 (POIR8) which describes the general steps taken to classify each of the rows of data used by witness Baron, outlines the six STS category definitions used in the classification function, explains which of the tally fields played important

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roles for each of the six STS categories, explains general classification rules that were implicit in our tally-type by tally-type analysis, and provides tally-group by tally-group descriptions of the key considerations underlying the STS classifications for the 38,557 tallies in LR-I-337. See also LR-I-383.

3. For tallies that identify the carrier's location as "On Route", the activity as "Walking" or "Travel B/t Dlvr. W/Sort", and the activity detail as "Walk Push Cart (code K04)" (1 tally of 38,557 total tallies in LR-I-337, and 3 tallies of 38,557 total tallies in LR-I-337, respectively), the data collector may have observed the carrier pushing the cart with one hand while holding and/or sorting mail in/with the other hand. The carrier would be holding/grasping the mail in a way that would allow for sorting of mail. The carrier may also have been sorting mail that was in or on the push cart. The carrier may have been moving the cart forward by pushing it with enough momentum to allow the cart to move forward thereby giving the carrier the opportunity to sort mail. Although the additional bar code Levels (11.1, 11.2, and 11.4) are not required for an understanding of these tallies, the remaining personal or administrative level, delivery type level, and delivery type status level provide additional supporting information about the observation and the choice of "Route/Access (FAT)". Identifying specific records with tally details including CY Code, route ID, date, etc. assists in understanding tallies in question for research purposes. Having tally details such as CY Code, route ID, and date is necessary when researching hard copy documentation associated with a

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specific tally. Also, having the specific tallies you were questioning would reduce my chances of providing a misleading response and reduce the effort required to query the database and possibly misidentify the requested information and associated tallies.

4. These tallies, "On Route", "Walking" or "Travel B/t Dlvr. W/Sort", and "Walk Push Cart" are all assigned to the Route/Access (FAT) category. Refer to the response to POIR8 which describes the general steps taken to classify each of the rows of data used by witness Baron, outlines the six STS category definitions used in the classification function, explains which of the tally fields played important roles for each of the six STS categories, explains general classification rules that were implicit in our tally-type by tally-type analysis, and provides tally-group by tally-group descriptions of the key considerations underlying the STS classifications for the 38,597 tallies in LR-I-337. See also LR-I-383.

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MPA/USPS-T13-121. MPA/USPS-T13-96 and your response were as follows:

MPA/USPS-T13-96. Please confirm that, with only minor exceptions, virtually all tallies for the "Point of Delivery" location were allocated to the Load or Street Support category. Please explain why you have done this.

RESPONSE:

I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

1. How many tallies in the database that have the "Point of Delivery" location were allocated to the Load or Street Support categories? If you do not have a precise number of such tallies, please provide an approximate number (e.g., hundreds, thousands, five thousand, or more?)
2. The first sentence of MPA/USPS-T13-96 asked for a confirmation that you allocated virtually all tallies with the "Point of Delivery" location to the Load or Street Support category. The second sentence asks you to explain why you have done this. Explain why is it necessary to have references to "the specific tallies in question" to answer the question.
3. Please respond to both sentences of the original question. If you are reluctant to confirm the first sentence because of the qualifiers "minor exceptions" and "virtually all," please quantify the percentage of total Delivery Point tallies that were allocated to the Load or Street Support category.

RESPONSE:

The following responses are based on LR-I-337 developed to support my responses to ADVO/USPS-T13-38 and 69.

1. 15,820 tallies of 38,557 total tallies in LR-I-337 with the Point of Delivery location were allocated to Load, and 21 tallies were allocated to Street Support.
2. Although the Location code Point of Delivery indicates the tally should be Load, the additional bar code Levels 11.1 Personal or Administrative level, 11.2 Delivery Type level, 11.3 Delivery Type Status level, 11.4 Activity level,

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and the 11.4.1 Activity Detail level provide additional supporting information about the STS category allocation. Identifying specific records with tally details including CY Code, route ID, date, etc. assists in understanding tallies in question for research purposes. Having tally details such as CY Code, route ID, and date is necessary when researching hard copy documentation associated with a specific tally. Also, having the specific tallies you were questioning would reduce my chances of providing a misleading response and reduce the effort required to query the database and possibly misidentify the requested information and associated tallies.

3. Confirmed. 0.08% of Point of Delivery tallies (13 tallies of 15854 Point of Delivery tallies in LR-I-337) were allocated to categories other than Load or Street Support. It is necessary to look at more than one work sampling code to determine the appropriate STS category. Refer to the response to Presiding Officer's Information Request No. 8 (POIR8), which describes the general steps taken to classify each of the rows of data used by witness Baron. The response to POIR8 outlines the six STS category definitions used in the classification function, explains which of the tally fields played important roles for each of the six STS categories, explains general classification rules that were implicit in our tally-type by tally-type analysis, and provides tally-group by tally-group descriptions of the key considerations underlying the STS classifications for the 38,557 tallies in LR-I-337. See also LR-I-383. The majority of the tallies were allocated to Load because the location "Point of

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Delivery" is consistent with the definition of Load, which is "delivering and collecting mail pieces at residential and business delivery points." A small portion of the tallies was allocated to Street Support because additional information on the tally indicated the carrier was performing a street support activity. The STS definition of Street Support Time is "the part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." For example, a tally may indicate that the carrier is performing a Setup activity. The carrier activity of Setup includes "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". On rare occasions the Setup, that is, organizing the mail the carrier has in his possession, may have to be redone at the Point of Delivery or On Route depending on the number of customers being serviced and/or volume of mail picked up at the delivery points. The Setup activity is therefore consistent with the definition of Street Support.

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MPA/USPS-T13-122. MPA/USPS-T13-97 and your response were as follows:

MPA/USPS-T13-97. Please confirm that, with the exception of Collection and Relay Box Locations, virtually all Del/Coll tallies were allocated to the Load or Street Support category. Please explain why you have done this.

RESPONSE: I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

1. With the exception of Collection and Relay Box locations, how many "Del/Coll" tallies in the database were allocated to the Load or Street Support categories? If you do not have a precise number of such tallies, please provide an approximate number (e.g., hundreds, thousands, five thousand, or more?)
2. The first sentence of MPA/USPS-T13-97 asked for a confirmation that, except for Collection and Relay Box locations, you allocated virtually all "Del/Coll" tallies to the Load or Street Support category. The second sentence asks you to explain why you have done this. Is it your position that you cannot respond without references to all of "the specific tallies in question." If so, please explain why.
3. Please respond to both sentences of the original question. If you are reluctant to confirm the first sentence because of the qualifier "virtually all," please quantify the percentage of total Del/Coll tallies that were allocated to the Load or Street Support category.

RESPONSE:

The following responses are based on LR-I-337 developed to support my responses to ADVO/USPS-T13-38 and 69.

1. There are 13,703 "Del/Coll" tallies of the 13,704 total "Del/Coll" tallies in LR-I-337, with the exception of Collection and Relay Box locations, allocated to Load Time. No "Del/Coll" tallies in LR-I-337 are allocated to Street Support Time with the exception of the tallies at a Relay Box location.

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2. Not exactly, although the Activity code Del/Coll indicates the tally should be Load, as stated in the response to Presiding Officer's Information Request No. 8 (POIR8), page 6, the additional bar code Levels 10.0 Location, 11.1 Personal or Administrative level, 11.2 Delivery Type level, 11.3 Delivery Type Status level, and the 11.4.1 Activity Detail level provide additional supporting information about the STS category allocation. Identifying specific records with tally details including CY Code, route ID, date, etc. assists in understanding tallies in question for research purposes. Having tally details such as CY Code, route ID, and date is necessary when researching hard copy documentation associated with a specific tally. Also, having the specific tallies you were questioning would reduce my chances of providing a misleading response and reduce the effort required to query the database and possibly misidentify the requested information and associated tallies.
3. Confirmed. Virtually all "Del/Coll" tallies were allocated to the Load category, with the exception of Collection Box and Relay Box Locations. No "Del/Coll" tallies, except for Collection Box and Relay Box Locations, were allocated to Street Support. With respect to allocating tallies to STS categories, it is necessary to look at more than one work sampling code to determine the appropriate STS category. Refer to the response to POIR8, which describes the general steps taken to classify each of the rows of data used by witness Baron. The response to POIR8 outlines the six STS category definitions used in the classification function, explains which of the tally fields played important

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roles for each of the six STS categories, explains general classification rules that were implicit in our tally-type by tally-type analysis, and provides tally-group by tally-group descriptions of the key considerations underlying the STS classifications for the 38,557 tallies in LR-I-337. See also LR-I-383. The STS definition of Load Time is "delivering and collecting mail pieces at residential and business delivery points." The "Del/Coll" Activity code is a strong indication that the appropriate STS category is Load Time. There may be exceptions, however. For example, the Relay Box location or the Collection Box location when used with the "Del/Coll" code requires the tallies to be allocated to Street Support or Collection time. I have created an Access query to reference the "Del/Coll" tallies and found *one* exception to the 13,704 tallies with the "Del/Coll" Activity code. This tally is allocated to Drive Time. After researching the manual records, I determined that this tally came from a centralized delivery type route. The pattern on this portion of the route was tallies of Point of Delivery, N/A, Central or Dismount, Business Inside or Resident Outside, Delivery, and Drop to Customer or Central Inside or Outside. Interspersed with these tallies were Vehicle, N/A, Central or Dismount, Business Inside or Resident Outside, Travel B/t Dlvr in an LLV. The one tally in question was Vehicle, N/A, Central, Business Inside, Del/Coll, and LLV. This particular record occurred between PBL at 2:35 PM and Point of Delivery at 2:47 PM. The Activity scan of "Del/Coll" was overruled, and,

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based on the remaining scans and the STS definition of Drive Time as stated
on page 7 of the response to POIR8, the tally was allocated to Drive Time.

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MPA/USPS-TI3-124. MPA/USPS-T13-100 and your response were as follows:

MPA/USPS-T13-100. Please confirm that you assigned the "Street Support" category to all tallies with:

- (a) Dock, Gas Station, In Unit Walking, PBL, or Relay Box locations.
- (b) Loading or Unloading activity, regardless of location.
- (c) Materials Handling activity detail.

RESPONSE: I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

- 1. This question asked for a confirmation of what you did. Explain why is it necessary to have references to specific tallies to answer this question.
- 2. Please respond to parts (a) and (c) of the original question.

RESPONSE:

The following responses are based on LR-I-337 developed to support my responses to ADVO/USPS-T13-38 and 69.

- 1. For the purpose of assigning STS codes to tallies, the Location code work sampling field alone does not necessarily provide enough information to determine the appropriate STS category. Therefore, other supporting information may be necessary to determine the STS classification. The personal or administrative level (Level 11.1), delivery type level (Level 11.2), delivery type status level (Level 11.3), activity level (Level 11.4), activity detail (Level 11.4.1), and tally details including CY Code, route ID, and date may provide additional supporting information about the choice of STS category assignment. Identifying specific records with tally details including CY Code, route ID, date, etc. assists in understanding tallies in question for research purposes. Having tally details such as CY Code, route ID, and date is

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necessary when researching hard copy documentation associated with a specific tally. Also, having the specific tallies you were questioning would reduce my chances of providing a misleading response and reduce the effort required to query the database and possibly misidentify the requested information and associated tallies.

2. (a) Not confirmed. One tally (of the 38,557 tallies in LR-I-337) with a Dock location is assigned to the "Driving Time" STS category. As stated in the response to Presiding Officer's Information Request No. 8 (POIR8), page 6, "...there are two to three work sampling fields whose entries tend to determine the appropriate STS category, with an additional three or four fields providing information to support the classification." *At minimum*, two work sampling fields should be reviewed for STS category assignment. "In general, the presence of Activity: **Travel Between Deliveries**, in combination with Delivery Type: **Central** or **Dismount** strongly indicates Driving time," as stated in the response to POIR8, page 7. Further examination of the *entire* work sampling tally shows work sampling scans of "Travel B/t Dlv." And "Dismount", both of which were used in determining the appropriate STS category for this tally.

- (c) Confirmed, although the assignment of STS category "Street Support Time" is based on more than one work sampling field, Material Handling in

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this particular instance. As mentioned in the response to 2(a), the response to POIR8 indicates more than one work sampling code tends to determine the appropriate STS category.

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MPA/USPS-T13-126. MPA/USPS-T13-106 and your response were as follows:

MPA/USPS-T13-106. There [are] Park Point location tallies which indicate central, curblin, or dismount delivery types. Per Appendix D, you state that the "Park Point" location applies to park and loop "routes". Please clarify, what were the data collectors indicating when they assigned the "Park Point" location?

RESPONSE: I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

1. Please confirm that Appendix D to your testimony defines "Park Point" as "The point where the vehicle is parked on Park and Loop routes."
2. Please confirm that there are tallies that identify the carrier's location as "Park Point" and the delivery type as either "Central," "Curblin," or "Dismount."
3. Please clarify what the data collectors were observing (where the carrier was and what the carrier was doing) when they assigned the Park Point location in these circumstances.

RESPONSE:

The following responses are based on LR-I-337 developed to support my responses to ADVO/USPS-T13-38 and 69.

1. Confirmed, although Appendix D was intended to provide general insight and was not intended to be a set of all-encompassing definitions.
2. Confirmed. Of the 38,557 total tallies in LR-I-337, there are 51 tallies identifying a "Park Point" location with a "Central" delivery type, 8 tallies identifying a "Park Point" location with a "Curblin" delivery type, and 22 tallies identifying a "Park Point" location with a "Dismount" delivery type.
3. By creating an Access query including all work sampling codes, CY Code, route ID, date and time of work sampling tally, and STS category fields to specifically reference the "Park Point" tallies, I have found 81 (of 38,557 total

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tallies in LR-I-337) with "Park Point" locations and "Central", "Curbline", or "Dismount" delivery types. 78 of the 81 tallies have an activity code indicating "Setup". With respect to the "Setup" activity code, data collectors most frequently observed carriers performing setup activities when the "Park Point" location code was scanned. Refer to my response to ADVO/USPS-T13-126 that describes activities involved with "Setup".

By creating an Access query including all work sampling codes, CY Code, route ID, date and time of work sampling tally, and STS category fields to specifically reference the "Park Point" location and "Setup" activity tallies, I have found one tally that does not have a "Setup" activity code, but has a "Loading" activity code that may indicate additional mail was brought out to the carrier and the carrier was loading the mail, trays, tubs, and and/or parcels into his/her vehicle while at a "Park Point". This tally is appropriately classified in the "Street Support Time" STS category. "In general, the presence of Activity of **Loading, Unloading, Setup, Travel to 1st Delivery Point, or Return to Unit** is a strong indicator that the appropriate STS category is Street Support Time," as stated on pages 6-7 of the response to Presiding Officer's Information Request No. 8 (POIR8).

By creating an Access query including all work sampling codes, CY Code, route ID, date and time of work sampling tally, and STS category fields to specifically reference the "Park Point" location and "Setup" activity tallies, I have found one tally indicating a "N/A" activity code with a "Dismount" delivery

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type. After researching this specific tally, we were unable to identify *exactly* what activity may have been occurring. This activity (work sampling scan sequence: L09 Park Point, A00 N/A, WT04 Dismount, S02 Business Outside, T00 N/A, K01 LLV) is appropriately classified as "Street Support Time" "because the carrier is not at the point of delivery and is at a park point of a dismount type delivery the STS category of Street Support is assigned," as stated in the attachment to my response to POIR8.

By creating an Access query including all work sampling codes, CY Code, route ID, date and time of work sampling tally, and STS category fields to specifically reference the "Park Point" location and "Setup" activity tallies, I have found one tally indicating a "N/A" activity code with a "Central" delivery type. After researching this specific tally, we were unable to identify *exactly* what activity may have been occurring. This activity (work sampling scan sequence: L09 Park Point, A00 N/A, WT05 Central, S04 Residential Outside, T00 N/A, H00 N/A) is appropriately classified as "Street Support Time" "because the carrier is not at the point of delivery and is at a park point of a central type delivery," as stated in the attachment to my response to POIR8.

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MPA/USPS-T13-127. MPA/USPS-T13-108 and your response were as follows:

MPA/USPS-T13-108. There are a lot of vehicle location tallies for dismount deliveries with "setup" activity. Per Appendix D, you state that setup is "relocating mail form [sic] rear of vehicle to front, loading satchel." But, Appendix D also states that Dismount is serving one or more customers by dismounting and without use of a satchel. Please explain what specific activity the data collectors were observing when they took these tallies.

RESPONSE: I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields.

1. Please confirm that Appendix D to your testimony defines "Setup" as "Relocating mail form [sic] rear of vehicle to front, loading satchel."
2. Please confirm that Appendix D to your testimony defines "Dismount" as "Serving one or more customers by dismounting and without use of a satchel."
3. For these tallies, please explain what the data collectors were observing (i.e., where the carrier was and what the carrier was doing) at that time, and how you can determine that from the tally information. If the explanation depends on other information in the tally that is not shown above, please identify that information.

RESPONSE:

The following responses are based on LR-I-337 developed to support my response to ADVO/USPS-T13-38 and 69.

- 1-2. Confirmed. "Setup" includes either or both of the activities listed in the definition. Appendix D was intended to provide general insight and was not intended to be a set of all-encompassing definitions.
3. During a "Dismount" the carrier has to get set up by obtaining the mail for one or more customers from the trays in the front of the vehicle and/or mail from the

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back of the vehicle, hence the use of the Setup code with "Dismount." On rare occasions the "Setup", that is, organizing the mail the carrier has in his/her possession, may have to be redone at the "Point of Delivery" or "On Route" depending on the number of customers being served and/or volume of mail picked up at the delivery points. A carrier may actually take tubs of mail along and/or pick up tubs of mail as part of a dismount. There are 591 tallies where the activity is "Setup" and the type of delivery is "Dismount". These tallies can be divided into six categories based on the location of the carrier.

- In the majority of the tallies (556 tallies), the carrier is located at the Vehicle. The activity detail for these 556 tallies indicates the vehicle type (LLV, Jeep, etc.).
- The location of the carriers in the remaining tallies are Park Point (21 tallies). A carrier can serve both Park & Loop customers and Dismount customers from the same Park Point.
- Point of Delivery (7 tallies) where the carrier could have been preparing/rearranging mail in bulk to continue on with additional deliveries.
- Dock (5 tallies) on a few occasions would have been the customer's Dock where the carrier as part of a Dismount would have been setting up to deliver.
- On Route (1 tally) would indicate the carrier stopped to setup the mail being carried somewhere between the vehicle and reaching the Delivery Point.

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- Collection Box (1 tally)

In all but three cases, the "Setup" activity is enough to put the tally in the STS street support category. The one tally with the "Collection Box" location is assigned to the STS Collection category. The two tallies with Dismount and Setup that were assigned to the STS Load category required additional research. The additional bar code Levels are very important for an understanding of these tallies. Identifying specific records with tally details including CY Code, route ID, date, etc. assists in understanding tallies in question for research purposes. Having tally details such as CY Code, route ID, and date is necessary when researching hard copy documentation associated with specific tallies. Also, having the specific tallies you were questioning would reduce my chances of providing a misleading response and reduce the effort required to query the database and possibly misidentify the requested information and associated tallies. These two tallies were queried and were researched through the manual records. Both are at "Point Of Delivery", and "Business Inside". In one case, the Activity Detail shows "Drop To Cust". The "Drop To Cust", along with the STS definition of Load Time as "delivering and collecting mail pieces at residential and business delivery points", placed this tally into Load. On rare occasions, the customer may arrive at the Point of Delivery and while the carrier is involved with various actions such as a setup ask the carrier for and take possession of the mail.

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The one remaining tally assigned to Load shows "LLV". The Activity Detail scan of LLV was overruled and, based on the remaining scans and the STS definition of Load, as stated on page 35 of my testimony, the tally was placed in Load. And after researching the manual records, I have determined that this tally came from a "dismount route". The carrier was serving a string of Dismount customers and the "carrier did not use bag." The pattern on the route was a string of tallies of Point of Delivery, N/A, Dismount, Business Inside or Resident Outside, Delivery, Drop to Cust or Central Outside. Interlaced in this string were tallies of On Route with Travel B/t Dlvr. in a LLV. The particular tally fell between two On Routes with Travel B/t Dlvr. that occurred at 3:22 and 3:34 PM. Based on this review the tally should be placed in Street Support, "preparing mail in bulk at the vehicle." That is, the carrier was with the LLV, which is at the Point of Delivery, to perform a Dismount for a Business Inside and is preparing mail at or in the LLV.

Refer to my response to Presiding Officer's Information Request No. 8 which describes the general steps taken to classify each of the rows of data used by witness Baron, outlines the six STS category definitions used in the classification function, explains which of the tally fields played important roles for each of the six STS categories, explains general classification rules that were implicit in our tally-type by tally-type analysis, and provides tally-group by tally-group descriptions of the key considerations underlying the STS classifications for the 38,557 tallies in LR-I-337. See also LR-I-383.

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: 5-31-00

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.
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May 31, 2000