

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

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO MPA INTERROGATORIES  
(MPA/USPS-T13-110, 111, 119, 123)  
(June 2, 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-T13-110, 111, 119, 123, filed on March 30, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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June 2, 2000

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**MPA/USPS-T13-110. Please refer to your responses to MPA/USPS-T13-107 and 109.**

**(a) In preparing your responses to those two interrogatories, explain how were you able to find and identify specific tallies in the database that corresponded to MPA's questions, without having "references to the specific records in question, including CY code, route ID, date, etc."**

**(b) In view of the fact that you were able to find and identify tallies that corresponded to those two MPA interrogatories, explain why you were not able to do the same with respect to each of the following MPA interrogatories:**

- 1. Interrogatory MPA/USPS-T13-83?**
- 2. Interrogatory MPA/USPS-T13-85?**
- 3. Interrogatory MPA/USPS-T13-86?**
- 4. Interrogatory MPA/USPS-T13-87?**
- 5. Interrogatory MPA/USPS-T13-88?**
- 6. Interrogatory MPA/USPS-T13-89?**
- 7. Interrogatory MPA/USPS-T13-90?**
- 8. Interrogatory MPA/USPS-T13-94?**
- 9. Interrogatory MPA/USPS-T13-96?**
- 10. Interrogatory MPA/USPS-T13-97?**
- 11. Interrogatory MPA/USPS-T13-99?**
- 12. Interrogatory MPA/USPS-T13-100?**
- 13. Interrogatory MPA/USPS-T13-101?**
- 14. Interrogatory MPA/USPS-T13-106?**
- 15. Interrogatory MPA/USPS-T13-108?**

**RESPONSE:**

**(a) A query was written using the criteria given in the interrogatories to identify the combination of scans in question that did identify the specific records. There was only one tally out of the 38000 plus tallies that had the criteria described in MPA/USPS-T13-107 and only two tallies with the criteria described in MPA/USPS-T13-109. 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**

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understanding tallies in question and 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. Since I was able to identify the permutations and identify the tallies relevant to these questions, and since the relevant permutations were few, it was possible to provide a more complete response within the available time period.

(b) Interrogatories 1-15 include terms such as: "several", "whether it should be", "categories are assigned to the same combinations", "there are some", "for each of these tally types please explain", "with some minor exceptions", "virtually all", "regardless of", "with the exception of", "to all tallies with", "a lot of". These words/groupings/qualifiers were used in conjunction with combinations of scans and/or with tables of different combinations of scan levels that would cause me to run hundreds of queries. I felt I could mislead, and/or would consume excessive amounts of time due to being required to prepare and run very complex queries with the possibility of not covering the right permutations. Therefore I felt that having the relevant tallies, with all of the information necessary to respond, I could focus on the issue that had prompted the question and prepare an appropriate response. My response to POIR8 and LR-I-383 will supply the

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information necessary to determine why various tallies were assigned to the STS  
categories.

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**MPA/USPS-T13-111. Please refer to your response to MPA/USPS-T13-98.**

**(a) In preparing your response to that interrogatory, explain how you were able to respond without having "references to the specific records in question, including CY code, route ID, date, etc." If you were you able to find and identify specific tallies in the database that corresponded to MPA's question, explain how you did so.**

**(b) In view of the fact that you were able to respond to that MPA interrogatory without having references to the specific records in question, explain why you were not able to do the same with respect to each of the fifteen MPA interrogatories listed in the preceding interrogatory MPA/USPS-T13-110.**

**RESPONSE:**

**(a) MPA/USPS-T13-98 was directed towards the activity of "No Access to Box" of which by using queries I found a limited number of permutations and tallies. Only one tally in Drive, six different permutations with one tally in Load, and one tally in FAT. Due to this limited number of permutations and tallies involved, I was able to provide a more complete response within the available time.**

**(b) The queries written to investigate the interrogatory did supply me with the information to look at the individual records. The other questions would have required so many queries as to make a complete response impossible within the available time. See my response to MPA/USPS-T13-110.**

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**MPA/USPS-T13-119. MPA/USPS-T13-93 and your response were as follows:**

**MPA/USPS-T13-93. Assume a carrier has just stopped his vehicle at a parking point for either a set of Central or Dismount deliveries within a single building:**

**(a) If he has not yet left the vehicle, what location would a data collector record: In Vehicle at Stop, On Route, or Vehicle?**

**(b) If he is working at his vehicle (e.g., unloading a tray of mail), what location would a data collector record?**

**(c) If he has left the vehicle and is proceeding to make his deliveries but has not yet gotten to the first delivery, what location would a data collector record?**

**(d) If he has reached the first delivery and is moving towards the next, what location would a data collector record?**

**(e) If he is returning to his vehicle from the last delivery on that stop, what location would a data collector record?**

**RESPONSE:**

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 is a hypothetical question concerning relatively routine carrier activities, which asks you to indicate for each subpart the "location" the data collector would record. Please explain the relevance and necessity for "references to specific records" in order to respond.**

**(2) Please respond to subparts (a)-(e) of the original question as if you were observing each of those instants of time and scanning the observation into your activity sampling database. If your answer to a particular subpart would vary depending on other information not contained in the question, please enumerate that other information and explain how it would affect the "location" that would be recorded. If you cannot respond, please explain fully why not.**

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RESPONSE:

(1) I was confused by the ambiguity of what is now called a hypothetical question, where I am being asked to supply a level 10 location without all of the real world information necessary to fill in the other levels that would possibility change the location selected. I had assumed that there were a number of actual occurrences that that had prompted this question, and that identification of these actual occurrences would assist in preparing a focused answer. My confusion began with the statement "assume a carrier has just stopped at a parking point". My interpretation was that this may or may not be the actual point at which the vehicle was parked, which impacts the location selected. Note that carriers often will stop at what is at first perceived as a point to park, but may only be pausing while On Route to a better park point. If the carrier had been demonstrating this pausing behavior, and the observers were position to see a possible better park point, the observers knowledge of the volume of mail (derived from the observations of the office work), may have resulted in the observer choosing to scan On Route. In Vehicle at Stop typically would not be used, but the scanned information in levels 11.4 and 11.4.1 could contain possible information that would justify its use as a location. The D08 Delay Specify code in 11.4 followed with a code in 11.4.1 may require me to look up the specific observer's comments to verify that the proper location of In Vehicle at Stop was appropriate. Making a decision as to which Location to use is not difficult when you are in the field and have the knowledge of the carrier's preceding actions - patterns, the

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**USPS form 3999X, the opportunity to see the type of delivery point(s) to be served, and knowledge of the volume of mail to be delivered.**

**(2) Let me assume for this hypothetical question that this is the point at which the carrier actually parked the vehicle. I also assume that these are the only delivery points to be served from this park point. I note, however, that it is possible to serve Centrals, and Dismounts, and Park & Loop sections from the same parking point, which could impact the location selection (Park Point versus Vehicle).**

**(a) Vehicle**

**(b) Vehicle**

**(c) On Route**

**(d) If he has completed the first dismount delivery and is moving towards the next delivery point then the location would be On Route. If he is serving Centrals and has placed some mail in the first receptacle and moving (reaching) to place mail in the next receptacle (delivery point) then the location is Point Of Deliver.**

**(e) On Route**



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MPA/USPS-T13-123. MPA/USPS-T13-99 presented a table (reproduced below) showing various types of tallies that you allocated to the Load category. It asked you to "Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the 'Load' category." You responded "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."

The purpose of that interrogatory was to gain an understanding of what these types of tallies represent (ie., what the data collectors were observing), how that can be determined from the tally, and why you assigned these tallies to the Load category. For example, subpart r. below identifies "On Route" carrier location, "Park & Loop" delivery type, "Finger @ Delivery" activity, and "Walk Flat" detail. However, it is unclear from that information where the carrier was and what the carrier was actually doing at the time of the observation, and why you have assigned it to Load.

Please respond to the original question for each of the types of tallies in the table below. For each tally type, provide in narrative form (not just data codes) your best understanding of what the data collector was actually observing. If that cannot be determined or you are unsure, please so state. If additional tally information not contained in the table is needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.

Explain for each subpart why you have assigned the tally type to Load. If the final assignment was based on an algorithm or decisional rule (e.g., all tallies with "x activity" are Load), please provide and explain it.

	Location	Delivery Type	Activity(ies)	Detail(s)
d.	On Route	Central	N/A	Central Inside
e.	On Route or Park Point	Any Delivery Type (WT Codes)	Del/Coll or Finger @ Delivery	Any Receptacle Type (H Codes)
i.	On Route	Curb	Del/Coll	Walking
l.	On Route	Dismount	Finger @ Delivery	Walk Flat
m.	On Route	Dismount	Parcel or Accountable	Walk Flat
n.	On Route	Dismount	Walking	Walk Flat
o.	On Route	Park & Loop	Accountable	N/A
p.	On Route	Park & Loop	Del/Coll	Walk Flat
q.	On Route	Park & Loop	Del/Coll	N/A
r.	On Route	Park & Loop	Finger @ Delivery	Walk Flat
y.	Point of Delivery	Any Delivery Type (WT Codes)	N/A	N/A
z.	Point of Delivery	Central, Dismount or Park & Loop	Setup	Vehicle Code (K Codes)
aa.	Point of Delivery	Central	Travel B/t Divr.	Central Outside
bb.	Point of Delivery	Central	Walking	Central Inside or Outside

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cc.	Point of Delivery	Central	Walking	Walk Flat
gg.	Point of Delivery	Any Delivery Type (WT Codes)	Travel B/t Divr.	Walk or vehicle Codes (K Codes)
hh.	Point of Delivery	Curb	Travel B/t Divr.	Walk Flat
ii.	Point of Delivery	Dismount	Parcel or Accountable	Walk Codes (K Codes)
kk.	Point of Delivery	Dismount	Travel B/t Divr.	Any Receptacle Type (H Codes)
ll.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll.	Walk Codes (K Codes)
mm.	Point of Delivery	Park & Loop	Travel B/t Divr.	Hard Slam
oo.	Vehicle	Central, Dismount or Park & Loop	Del/Coll or Finger @ Delivery	Receptacle Codes (H Codes)
pp.	Vehicle	Central, Dismount or Park & Loop	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
tt.	Vehicle	Dismount	Travel B/t Divr.	Drop to Customer

**RESPONSE:**

d. I can find only one tally in LR-I-163 containing the combination described.

This tally is not assigned to load time. It is assigned to Route/Access (FAT).

The record indicates the carrier's location as "On Route". The delivery type being serviced is central. These portions of the record are consistent with the definition of "FAT". The carrier is on a route that has residential inside central delivery points, providing further support for the classification of Route/Access (FAT).

Count	Site Location	Personal	Non Job Ad	Job Administra	Activities	Work Type
1	On Route	N/A	Central	Resident Inside	N/A	Central Inside

e. For tallies with a carrier location of "On Route", the activities of "Del/Coll." (deliver or collect) or "Finger @ Delivery" (carrier sorting mail at the delivery point)(emphasis added) are consistent with the load time definition. Tallies with a carrier location of "Park Point" and an activity of "Finger @ Delivery"

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are again consistent with the load time definition. In each case, the carrier is delivering mail, collecting mail, or sorting mail at a delivery point.

Count	Site Location	Personal	Non Job Ad	Job Administrat	Activities	Work Type
2	On Route	N/A	Central	Business Inside	Del/Coll.	Central Inside
1	On Route	N/A	Central	Business Outside	Del/Coll.	Central Outside
2	On Route	N/A	Central	Resident Inside	Del/Coll.	Central Inside
8	On Route	N/A	Central	Resident Outside	Del/Coll.	Central Outside
1	On Route	N/A	Curb	N/A	Del/Coll.	# 1 Box
10	On Route	N/A	Curb	Resident Outside	Del/Coll.	# 1 Box
1	On Route	N/A	Curb	Resident Outside	Del/Coll.	Drop to Cust
1	On Route	N/A	Curb	Resident Outside	Finger @ Deliver	# 2 Box
4	On Route	N/A	Dismount	Business Inside	Del/Coll.	Drop to Cust
1	On Route	N/A	Dismount	Business Outside	Del/Coll.	Drop to Cust
4	On Route	N/A	Dismount	Resident Outside	Del/Coll.	1 Hand Slam
1	On Route	N/A	Dismount	Resident Outside	Del/Coll.	Drop to Cust
3	On Route	N/A	Foot	Business Inside	Del/Coll.	Drop to Cust
1	On Route	N/A	Foot	Business Outside	Del/Coll.	1 Handed Slot
1	On Route	N/A	Foot	Business Outside	Del/Coll.	Drop to Cust
1	On Route	N/A	Foot	Resident Inside	Del/Coll.	Central Inside
1	On Route	N/A	Foot	Resident Outside	Del/Coll.	1 Hand Slam
3	On Route	N/A	Foot	Resident Outside	Del/Coll.	1 Handed Slot
3	On Route	N/A	Park & Loop	Business Inside	Del/Coll.	Drop to Cust
2	On Route	N/A	Park & Loop	Resident Inside	Del/Coll.	Central Inside
8	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	# 1 Box
9	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	1 Hand Slam
7	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	1 Handed Slot
1	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	2 Handed Slot
1	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	Drop to Cust
1	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	Flat Receptacle
1	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	Illegal Mail Box
2	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	N/A
1	On Route	N/A	Park & Loop	Resident Outside	Finger @ Deliver	1 Hand Slam
Count	Site Location	Personal	Non Job Ad	Job Administrat	Activities	Work Type
1	Park Point	N/A	Park & Loop	Resident Outside	Del/Coll.	Central Outside

(i) I can find only one tally in LR-I-163 containing the combination described.

The data points record the carrier location as "On Route". The activity of "Del/Coll" (deliver or collect), is consistent with the load time definition. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a curb type delivery point.

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Count	Site_Location	Personal	Non_Job_Ad	Job_Administrati	Activities	Work_Type
1	On Route	N/A	Curb	Resident Outside	Del/Coll.	Walking

- (l) I can find only one tally in LR-I-163 containing the combination described. The data points record the carrier location as "On Route. The activity of "Finger @ Deliver" is the activity of the carrier fingering the mail at the point of delivery. This is a load activity. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He or she is delivering to a dismount type delivery, and the activity detail of "Walk Flat" indicates he/she is walking on a flat surface.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administrati	Activities	Work_Type
1	On Route	N/A	Dismount	Business Outside	Finger @ Deliver	Walk Flat

- (m) The tallies are not assigned to load time. It is assigned to Route/Access (FAT). The record indicates the carrier's location as "On Route". The delivery type being serviced is central. These portions of the record are consistent with the definition of "FAT". The carrier is on a route that has residential inside central delivery points, providing further support for the classification of Route/Access (FAT). Originally seven tallies with an activity of accountable were assigned to load time. These tallies have been corrected in LR-I-337.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administrati	Activities	Work_Type
38	On Route	N/A	Dismount	Resident Outside	Accountable	Walk Flat
1	On Route	N/A	Dismount	Business Inside	Parcel	Walk Flat
1	On Route	N/A	Dismount	N/A	Parcel	Walk Flat
1	On Route	N/A	Dismount	Resident Inside	Parcel	Walk Flat
165	On Route	N/A	Dismount	Resident Outside	Parcel	Walk Flat

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(n) These tallies are assigned Route/Access (FAT) rather than to Load. The records indicate the carrier's location as "On Route". The delivery type being serviced is "dismount" and the carrier is walking. These portions of the record are consistent with the definition of "FAT". The remaining activity detail of "walking flat" indicates he/she is walking on a flat surface. Originally five tallies with the activity of "Walking" were assigned to load time. These tallies have been corrected in LR-I-337.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administra	Activities	Work_Type
34	On Route	N/A	Dismount	Business Inside	Walking	Walk Flat
3	On Route	N/A	Dismount	Business	Walking	Walk Flat
49	On Route	N/A	Dismount	Resident Outside	Walking	Walk Flat

(o) I can find only one tally in LR-I-163 containing the combination described.

This record was originally assigned to load time. In LR-I-337 this one tally has been reassigned to Route/Access (FAT). The carrier is on a park and loop portion of the route delivering an accountable. Because the activity detail does not provide any supporting information the record must be changed.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administra	Activities	Work_Type
1	On Route	N/A	Park & Loop	Resident Outside	Accountable	N/A

(p) I can find only three tallies in LR-I-163 containing the combination described.

The data points record the carrier location as "On Route". The activity of "Del/Coll." (deliver or collect) is consistent with the load time definition. The other supporting information included in the record provides more detail as to

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exactly what work the carrier is performing. He/she is delivering on a park & loop type delivery, and is walking on a flat surface.

Count	Site Location	Personal	Non Job Ad	Job Administra	Activities	Work Type
3	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	Walk Flat

(q) I can find only two tallies in LR-I-163 containing the combination described.

The data points record the carrier location as "On Route". The activity of "Del/Coll." (Deliver and collect) is consistent with the broad time definition.

The other supporting information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering on a park & loop type delivery.

Count	Site Location	Personal	Non Job Ad	Job Administra	Activities	Work Type
2	On Route	N/A	Park & Loop	Resident Outside	Del/Coll.	N/A

(r) I can find only one tally in LR-I-163 containing the combination described.

The data points record the carrier location as "On Route". The activity of "Finger @ Deliver" is the activity of the carrier fingering the mail *at the point of delivery*. (emphasis added) This is a load activity. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a park & loop type delivery, and is walking on a flat surface.

Count	Site Location	Personal	Non Job Ad	Job Administra	Activities	Work Type
1	On Route	N/A	Park & Loop	Resident Outside	Finger @	Walk Flat

(y) I can find only seven tallies in LR-I-163 containing the combination described.

The data points record the carrier location as "Point of Deliver", which is

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consistent with the load time definition. He is at the point of delivery, delivering to a central, dismount or park and loop type delivery, in a residential neighborhood of inside or outside delivery points.

Count	Site Location	Personal	Non Job Ad	Job Administrat	Activities	Work Type
1	Point of Deliver	Forms	Central	N/A	N/A	N/A
1	Point of Deliver	Forms	Central	Resident Outside	N/A	N/A
1	Point of Deliver	N/A	Central	Resident Inside	N/A	N/A
2	Point of Deliver	N/A	Dismount	Resident Outside	N/A	N/A
1	Point of Deliver	N/A	Park & Loop	N/A	N/A	N/A
1	Point of Deliver	N/A	Park & Loop	Resident Outside	N/A	N/A

(z) This tally should be assigned to street support time. The STS definition of street support time is "The part of street time spent on activities such as traveling to and from the route, to the carriers' station, obtaining and loading the vehicle, and preparing mail in bulk at the vehicle and at relay boxes." The carrier location is at the "Point of Deliver". On further examination the carrier activity of "Setup" is "relocating mail from the rear of the vehicle to the front or loading the satchel for a loop of a park and loop delivery". This is consistent with "preparing mail in bulk at the vehicle", which is a Street Support activity. The activity detail of LLV or Jeep confirms the carriers' location.

Count	Site Location	Personal	Non Job Ad	Job Administrat	Activities	Work Type
2	Point of Deliver	N/A	Central	Business Outside	Setup	LLV
4	Point of Deliver	N/A	Central	Resident Outside	Setup	LLV
3	Point of Deliver	N/A	Curb	Resident Outside	Setup	LLV
1	Point of Deliver	N/A	Dismount	Business Inside	Setup	LLV
1	Point of Deliver	N/A	Dismount	Business Outside	Setup	Jeep
3	Point of Deliver	N/A	Dismount	Resident Outside	Setup	LLV
1	Point of Deliver	N/A	Park & Loop	Business Outside	Setup	Jeep
1	Point of Deliver	N/A	Park & Loop	Business Outside	Setup	LLV
1	Point of Deliver	N/A	Park & Loop	Resident Outside	Setup	LLV

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(aa) I can find only one tally in LR-I-163 containing the combination described.

The data points record the carrier location as "Point of Deliver". This is consistent with the load time definition. The activity of "Travel B/t Dlvr" is ignored. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a residential "Central" type delivery with central outside mailboxes.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administrat	Activities	Work_Type
1	Point of Deliver	N/A	Central	Resident Outside	Travel B/t Dlvr.	Central Outside

(bb) The tallies record the carrier location as "Point of Deliver". This is consistent with the load time definition. The activity of "Travel B/t Dlvr" is ignored. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a residential "Central" type delivery with central outside mailboxes. LR-I-163 has these tallies assigned to load time. This is the correct designation. The first record listed below was incorrectly changed in LR-I-337 to Route/Access (FAT).

Count	Site_Location	Personal	Non_Job_Ad	Job_Administrat	Activities	Work_Type
1	Point of Deliver	N/A	Central	Resident Inside	Walking	Central Outside
2	Point of Deliver	N/A	Central	Resident Outside	Walking	Central Inside
1	Point of Deliver	N/A	Central	Resident Outside	Walking	Central Outside

(cc) I can find only one tally in LR-I-163 containing the combination described.

The data points record the carrier location as "Point of Deliver", which is consistent with the load time definition. The activity of walking is ignored. The other information included in the record provides more detail as to exactly



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what work the carrier is performing. He/she is delivering to a central type delivery, in a residential neighborhood of inside delivery points.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administra	Activities	Work_Type
1	Point of Deliver	N/A	Central	Resident Inside	Walking	Walk Flat

(gg) Several STS Categories apply to this combination of codes described.

The first grouping of nine tallies associated with "Curb" delivery should be classified as load time. The carrier is at the "Point of Deliver", the activity of "Travel B/t Deliver" (traveling between deliveries) is ignored, and the activity detail of "LLV" on a curb route define load time. The next two tallies should be reassigned to load time because of the above reasons. The next single tally, with the activity detail of "Walk Flat" should be reassigned to Route /Access (CAT). The next grouping of four tallies associated with the "Dismount" deliveries and an activity detail of some type of walking should be associated with the Route/Access (FAT) category because the carrier is walking on the dismount portion of the route. The other six tallies associated with "Dismount" and the activity detail of "LLV" and the location of "Point of Delivery" are assigned to load time because the carrier is not walking and is at the LLV at the point of delivery. The next grouping of four tallies associated with the "Park & Loop" delivery type and the STS category of Route/Access (FAT) are assigned this category because the activity detail is "Walk Flat". The remaining tally associated with "Park & Loop" is assigned the load time category due to the location (point of deliver) and activity detail (LLV).

Co	Site_Location	Pers	Non_Job_A	Job_Administrat	Activities	Work_Typ	STS Type
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9	Point of Deliver	N/A	Curb	Resident Outside	Travel B/t Divr.	LLV	Load Time
2	Point of Deliver	N/A	Curb	Resident Outside	Travel B/t Divr.	LLV	Route/Access (CAT)
1	Point of Deliver	N/A	Curb	Resident Outside	Travel B/t Divr.	Walk Flat	Load Time
1	Point of Deliver	N/A	Dismount	Business Inside	Travel B/t Divr.	Walk Flat	Load Time
1	Point of Deliver	N/A	Dismount	Business Outside	Travel B/t Divr.	Walk Obst	Route/Access (FAT)
6	Point of Deliver	N/A	Dismount	Resident Outside	Travel B/t Divr.	LLV	Load Time
2	Point of Deliver	N/A	Dismount	Resident Outside	Travel B/t Divr.	Walk Flat	Route/Access (FAT)
2	Point of Deliver	N/A	Park & Loop	Business Inside	Travel B/t Divr.	Walk Flat	Route/Access (FAT)
1	Point of Deliver	N/A	Park & Loop	Business Outside	Travel B/t Divr.	LLV	Load Time
2	Point of Deliver	N/A	Park & Loop	Resident Outside	Travel B/t Divr.	Walk Flat	Route/Access (FAT)

(hh) Please refer to ADVO/USPS-T13-123 (gg).

(ii) The tallies record the carrier location as "Point of Deliver", which is consistent with the load time definition. The activity of "Parcel" is the activity of the carrier delivering a parcel, and the activity of "Accountable" indicates the carrier is delivering an accountable. Each of these are load time activities. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is walking, delivering at a dismount type delivery.

Count	Site Location	Personal	Non Job A	Job Administrat	Activities	Work Typ
2	Point of Deliver	N/A	Dismount	Resident Inside	Accountable	Walking
1	Point of Deliver	N/A	Dismount	Resident Outside	Accountable	Walk Flat
2	Point of Deliver	N/A	Dismount	Resident Outside	Parcel	Walk Flat
1	Point of Deliver	N/A	Dismount	Resident Outside	Parcel	Walking

(kk) I can find only three tallies in LR-I-163 containing the combination described.

The data points record the carrier location as "Point of Deliver", which is consistent with the load time definition. The activity of "Travel B/t Divr" is ignored due to the activity detail recorded as a receptacle. The other

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information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a dismount type delivery point of residential outside or business inside delivery points.

Count	Site_Location	Personal	Non_Job_A	Job_Administrat	Activities	Work_Type
1	Point of Deliver	N/A	Dismount	Business Inside	Travel B/t	Drop to Cust
2	Point of Deliver	N/A	Dismount	Resident Outside	Travel B/t	# 1 Box

(II) I can find only one tally in LR-I-163 containing the combination described.

The data points record the carrier location as "Point of Deliver", which is consistent with the load time definition. The activity of "Del/Coll." (deliver or collect) is also consistent with the load time definition. The other information included in the record indicates the carrier is walking.

Count	Site_Location	Personal	Non_Job_A	Job_Administrat	Activities	Work_Type
1	Point of Deliver	N/A	Foot	Resident Inside	Del/Coll.	Walking

(mm) I can find only one tally in LR-I-163 containing the combination described.

The data points record the carrier location as "Point of Deliver" (point of delivery), which is consistent with the load time definition. The activity of "Travel B/t Deliver" is ignored. The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a park and loop type delivery, on the residential outside delivery portion of a route to a 1-hand slam type mailbox.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administra	Activities	Work_Type
1	Point of Deliver	N/A	Park & Loop	Resident Outside	Travel B/t	Hand Slam

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(oo) The tallies record the carrier location as "Vehicle", which is not enough information to determine the category. The activities of "Del/Coll." (Deliver or collect) or "Finger @ Delivery" (the activity of the carrier fingering the mail at the point of delivery) are consistent with the load time definition. The delivery type is the final piece needed to verify what type of delivery point the carrier is delivering the mail to. The other information included in the record provides more detail as to exactly what work the carrier is performing. He/she is placing the mail into a receptacle or handing the mail to a customer at a central, dismount, or park & loop type delivery point.

Count	Site_Location	Personal	Non_Job_Ad	Job_Administrat	Activities	Work_Type
21	Vehicle	N/A	Central	Resident Outside	Del/Coll.	Central Outside
1	Vehicle	N/A	Central	Resident Outside	Finger @ Deliver	Central Outside
4	Vehicle	N/A	Dismount	Business Inside	Del/Coll.	Drop to Cust
1	Vehicle	N/A	Dismount	Business Inside	Del/Coll.	N/A
1	Vehicle	N/A	Dismount	Business Outside	Del/Coll.	# 1-1/2 Box
1	Vehicle	N/A	Dismount	Business Outside	Del/Coll.	# 2 Box
1	Vehicle	N/A	Dismount	Business Outside	Del/Coll.	Drop to Cust
1	Vehicle	N/A	Dismount	Business Outside	Del/Coll.	N/A
1	Vehicle	N/A	Dismount	Resident Inside	Del/Coll.	N/A
5	Vehicle	N/A	Dismount	Resident Outside	Del/Coll.	# 1 Box
1	Vehicle	N/A	Dismount	Resident Outside	Del/Coll.	# 1-1/2 Box
3	Vehicle	N/A	Dismount	Resident Outside	Del/Coll.	1 Hand Slam
2	Vehicle	N/A	Dismount	Resident Outside	Del/Coll.	1 Handed Slot
5	Vehicle	N/A	Dismount	Resident Outside	Del/Coll.	Drop to Cust
2	Vehicle	N/A	Park & Loop	Resident Outside	Del/Coll.	# 1 Box
1	Vehicle	N/A	Park & Loop	Resident Outside	Del/Coll.	Illegal Mail Box

(pp) The tallies record the carrier location as "Vehicle", which is not enough information to determine the category. The activities of "Del/Coll." (Deliver or collect) or "Finger @ Delivery" (the activity of the carrier fingering the mail at the point of delivery) are consistent with the load time definition. The remaining information included in the record provides more detail as to

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exactly what work the carrier is performing. He/she is delivering to a central, dismount, or park & loop type delivery.

Count	Site Location	Personal	Non Job Ad	Job Administrat	Activities	Work Type
1	Vehicle	N/A	Central	Business Inside	Del/Coll.	LLV
1	Vehicle	N/A	Central	Resident Inside	Finger @ Deliver	LLV
3	Vehicle	N/A	Central	Resident Outside	Del/Coll.	LLV
3	Vehicle	N/A	Central	Resident Outside	Finger @ Deliver	LLV
1	Vehicle	N/A	Dismount	Business Inside	Del/Coll.	LLV
2	Vehicle	N/A	Dismount	Business Inside	Finger @ Deliver	LLV
8	Vehicle	N/A	Dismount	Business Outside	Finger @ Deliver	LLV
20	Vehicle	N/A	Dismount	Resident Outside	Finger @ Deliver	LLV
1	Vehicle	N/A	Park & Loop	Resident Outside	Del/Coll.	LLV

(tt) The tallies record the carrier location as "Vehicle". The activity of "Travel B/t Dlv" is ignored. The load time definition is supported by the "Drop to Cust" (drop to customer) activity detail, because the load time definition includes "incidental time for customer contacts". The remaining information included in the record provides more detail as to exactly what work the carrier is performing. He/she is delivering to a dismount type delivery.

Count	Site Location	Personal	Non Job Ad	Job Administrat	Activities	Work Type
1	Vehicle	N/A	Dismount	Business Inside	Travel B/t Dlv.	Drop to Cust
1	Vehicle	N/A	Dismount	N/A	Travel B/t Dlv.	Drop to Cust

**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: 6-2-00

**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  
June 2, 2000