

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 QUESTIONS POSED AT HEARING
(June 7, 2000)

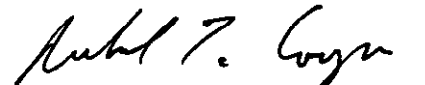
The United States Postal Service hereby provides the response of witness Raymond to questions posed at hearing counsel for Advo, Inc., and by the Presiding Officer. See Tr. 18/7961-63, 7971-73 and 7981-83. The requests are restated and are followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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June 7, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
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At Tr. 18/7961-7963 ADVO's counsel requested information pertaining to CY02 and CY04 routes that were included in Phase 1 and/or Phase 2 of the ES study. In addition a request was made for information on routes that were studied for multiple days, and on some of the days of data that were not included in the data base presented in USPS-LR-I-163.

At Tr. 18/7971-7973 ADVO's counsel, Chairman Gleiman, and USPS counsel discussed obtaining a crosswalk between LR-I-163 and the overall ES data that was collected.

At Tr. 18/7981-7983 ADVO's counsel requested information on route days not included in LR-I-163.

RESPONSE:

I have completed research of the various manual and electronic records pertaining to the ES Study to compile the listing of routes that were not included in LR-I-163. Attached is a copy of an Excel® spreadsheet that identifies the CY code ("Unit"), Route code ("Route"), study date of the route day ("Date"), in which Phase the data was collected ("Phase"), and the reason why the route day was not included in LR-I-163 ("Comments"). LR-I-399 is the electronic version of the attached spreadsheet.

Please see my responses to ADVO/USPS-T13-32(ii) and ADVO/USPS-T13-63(v) for additional information on routes that were not included in LR-I-163. These routes are included in the attached spreadsheet and LR-I-399. Further descriptions of the more common reasons noted on the spreadsheet for routes not being included in LR-I-163 follow:

"Equipment Problems" include TimeWand® II malfunctions, computer related problems uploading data from the field, and/or video camera problems.

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"Multiple Carriers on Route" refers to circumstances in which multiple carriers simultaneously delivered mail on sections of the route being studied. In such instances, it was not possible for the study team to collect information regarding the activities of all such carriers, and hence only partial results were obtained for the route.

"Partial Route" studies (routes less than 8 hours) occurred when carriers handed off parts of their routes such that the team could not collect sufficient data or when carriers had an atypical day (e.g. a "food drive" was being conducted, or the carrier took personal/medical leave time resulting in an incomplete (partial) route day).

"Partial Scans" refers to days in which the carrier worked a full day and the entire route was studied, but the work-sampling scans for some reason do not reflect the entire day observed.

"Missing Scans" refers to days in which no work-sampling scans exist in the database.

Regarding "Route Interference (Union)", the Union had the right to observe the study process and on occasion interacted with the carrier to the point where the data being collected was affected.

Support documentation in "Support Documentation Incomplete" includes, but is not limited to, observer comment logs, information collected/recorded manually that was not electronically uploaded, USPS form 3999X, and field generated reports. The documentation was considered incomplete due to a variety of circumstances, including, but not limited to, field data package getting

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lost, damaged, or tampered with in the process of being sent in, damage to documentation resulting from adverse weather conditions, or information being possibly misplaced when being used/filed or during one of our moving processes.

Route Days not Included in LR-I-337

Unit	Route	Date	Phase	Comments
CY02	1579	22-May-97	2	Equipment Problems
CY02	1579	29-May-97	2	Missing Scans
CY02	1579	30-May-97	2	Missing Scans
CY02	1595	15-Oct-96	1	Support Documentation Incomplete
CY04	4211	12-Mar-98	2	Partial Scans and Multiple Carriers on Route
CY04	4214	16-Nov-96	1	Partial Route Less Than 8 Hours
CY04	4219	28-Oct-96	1	Support Documentation Incomplete
CY04	4223	31-Oct-96	1	Route Interference (Union)
CY04	4227	29-Oct-96	1	Support Documentation Incomplete
CY04	4234	23-Aug-97	2	Equipment Problems
CY04	4239	21-Feb-98	2	Multiple Carriers on Route
CY04	4242	30-Oct-96	1	Stand Up meeting by district manager
CY04	4243	3-Jul-97	2	Multiple Carriers on Route
CY04	4265	10-Mar-98	2	Multiple Carriers on Route
CY04	4265	11-Mar-98	2	Partial Scans and Multiple Carriers on Route
CY04	4906	17-Dec-97	2 After Implementation	Multiple Carriers on Route
CY04	4906	14-Jan-98	2 After Implementation	Incomplete Route - Carrier left route, deliveries not completed.
CY04	4906	15-Jan-98	2 After Implementation	Partial Scans and Multiple Carriers on Route
CY04	4908	15-Jan-98	2 After Implementation	Partial Scans
CY04	4908	5-Feb-98	2 After Implementation	Multiple Carriers on Route
CY04	4908	9-Feb-98	2 After Implementation	Partial Scans and Multiple Carriers on Route
CY04	4909	9-Dec-97	2 After Implementation	Equipment Problems
CY04	4909	17-Jan-98	2 After Implementation	Multiple Carriers on Route
CY04	4909	3-Feb-98	2 After Implementation	Equipment Problems
CY04	4910	10-Dec-97	2 After Implementation	Partial Scans
CY04	4910	19-Dec-97	2 After Implementation	Equipment Problems
CY04	4910	28-Jan-98	2 After Implementation	Partial Scans
CY04	4910	4-Feb-98	2 After Implementation	Multiple Carriers on Route
CY04	4910	23-Feb-98	2 After Implementation	Partial Scans and Multiple Carriers on Route
CY04	4915	20-Dec-97	2 After Implementation	Support Documentation Incomplete
CY04	4915	23-Jan-98	2 After Implementation	Equipment Problems
CY04	4917	8-Dec-97	2 After Implementation	Support Documentation Incomplete
CY04	4917	21-Jan-98	2 After Implementation	Support Documentation Incomplete
CY04	4917	6-Feb-98	2 After Implementation	Multiple Carriers on Route
CY04	4917	20-Feb-98	2 After Implementation	Partial Scans and Multiple Carriers on Route
CY04	4920	24-Jan-98	2 After Implementation	Partial Scans
CY04	4920	26-Jan-98	2 After Implementation	Test Site too many deliveries given away
CY04	4920	31-Jan-98	2 After Implementation	Route Interference (Union)
CY04	4926	13-Dec-97	2 After Implementation	Support Documentation Incomplete
CY04	4926	22-Jan-98	2 After Implementation	Test Site too many deliveries given away

Route Days not Included in LR-I-337

Unit	Route	Date	Phase	Comments
CY04	4931	20-Jan-98	2 After Implementation	Multiple Carriers on Route
CY04	4940	24-Jan-98	2 After Implementation	Partial Scans
CY04	4940	2-Feb-98	2 After Implementation	Test Site too many deliveries given away
CY04	4944	16-Dec-97	2 After Implementation	Support Documentation Incomplete
CY04	4944	12-Jan-98	2 After Implementation	Partial Scans
CY04	4944	29-Jan-98	2 After Implementation	Test Site too many deliveries given away
CY04	4945	27-Jan-98	2 After Implementation	Multiple Carriers on Route
CY06	7519	25-Oct-96	1	Partial Scans
CY06	9302	29-Oct-96	1	Partial Scans
CY06	9303	26-Oct-96	1	Partial Scans
CY07	8061	18-Oct-96	1	Support Documentation Incomplete
CY11	4732	31-Oct-96	1	Support Documentation Incomplete
CY11	4811	21-Oct-96	1	Support Documentation Incomplete
CY14	3704	5-Nov-96	1	Partial Scans
CY14	3705	7-Nov-96	1	Multiple Carriers on Route
CY14	3705	4-Feb-97	1	Support Documentation Incomplete
CY17	1906	8-Nov-96	1	Support Documentation Incomplete
CY17	1970	9-Nov-96	1	Route Interference (Union)
CY18	2912	13-Nov-96	1	Excess travel carrier forgot parcels
CY18	2934	6-Feb-97	1	Excess travel due to handoff
CY18	2947	12-Nov-96	1	Route Interference (Union)
CY19	4846	16-Nov-96	1	Partial Scans
CY19	4876	15-Nov-96	1	Partial Scans
CY20	5546	9-Nov-96	1	Partial Scans
CY20	5553	14-Nov-96	1	Equipment Problems
CY20	5553	4-Feb-97	1	Route Interference (Union)
CY20	5566	13-Nov-96	1	Partial Scans
CY21	6229	15-Nov-96	1	Partial Route See Response to ADVO/USPS-T13-63 (v)
CY21	6234	20-Nov-96	1	Partial Route See Response to ADVO/USPS-T13-63 (v)
CY21	6248	18-Nov-96	1	Partial Route See Response to ADVO/USPS-T13-63 (v)
CY21	6288	19-Nov-96	1	Partial Route See Response to ADVO/USPS-T13-63 (v)
CY22	5414	4-Nov-96	1	Union Representatives interfering w/carrier and observers See Response to ADVO/USPS-T13-63 (v)
CY22	5416	6-Nov-96	1	Union Representatives interfering w/carrier and observers See Response to ADVO/USPS-T13-63 (v)
CY22	5420	5-Nov-96	1	Union Representatives interfering w/carrier and observers See Response to ADVO/USPS-T13-63 (v)
CY22	5433	7-Nov-96	1	Union Representatives interfering w/carrier and observers See Response to ADVO/USPS-T13-63 (v)
CY23	0211	6-Jan-97	1	Route Interference (Union)
CY23	0218	7-Jan-97	1	Route Interference (Union)
CY23	0222	8-Jan-97	1	Route Interference (Union)
CY23	0401	11-Jan-97	1	Equipment problems
CY23	0414	10-Jan-97	1	Support Documentation Incomplete

Route Days not Included in LR-I-337

Unit	Route	Date	Phase	Comments
CY23	0433	9-Jan-97	1	Route Interference (Union)
CY32	3507	5-Dec-96	1	USPS 3999x and related study documents never received at central location See Response to ADVO/USPS-T13-63 (v)
CY32	3522	4-Dec-96	1	USPS 3999x and related study documents never received at central location See Response to ADVO/USPS-T13-63 (v)
CY32	3543	6-Dec-96	1	USPS 3999x and related study documents never received at central location See Response to ADVO/USPS-T13-63 (v)
CY42	0429	12-Feb-97	1	Unusual nature of site, Multiple carriers casing and delivering route See Response to ADVO/USPS-T13-63 (v)
CY43	0163	11-Feb-97	1	Unusual nature of site, Multiple carriers casing and delivering route See Response to ADVO/USPS-T13-63 (v)
CY44	3127	12-Feb-97	1	Unusual nature of site, Multiple carriers casing and delivering route See Response to ADVO/USPS-T13-63 (v)
CY44	3133	13-Feb-97	1	Unusual nature of site, Multiple carriers casing and delivering route See Response to ADVO/USPS-T13-63 (v)
CY45	5405	11-Feb-97	1	Equipment problems interfered w/data collection See Response to ADVO/USPS-T13-63 (v)
CY46	1133	5-May-97	2	Route Interference (Union)
CY46	1133	10-May-97	2	Carrier involved in tasks related to the "food drive" throughout the day.
CY46	1133	12-May-97	2	Equipment Problems
CY46	1133	15-May-97	2	Support Documentation Incomplete
CY46	1133	17-May-97	2	Support Documentation Incomplete
CY46	1145	18-Jul-97	2	Equipment Problems
CY46	1145	19-Jul-97	2	Multiple Carriers on Route
CY46	1145	25-Jul-97	2	Support Documentation Incomplete
CY46	1148	3-Jun-97	2	Equipment Problems
CY46	1148	4-Jun-97	2	Equipment Problems
CY46	1148	11-Jun-97	2	Partial Scans
CY46	1148	13-Jun-97	2	Partial Scans
CY46	1148	14-Jun-97	2	Support Documentation Incomplete
CY46	1148	19-Jun-97	2	Support Documentation Incomplete
CY47	1411	5-May-97	2	Support Documentation Incomplete
CY47	1411	12-May-97	2	Support Documentation Incomplete
CY47	1411	13-May-97	2	Support Documentation Incomplete
CY47	1411	14-May-97	2	Support Documentation Incomplete
CY47	1411	15-May-97	2	Support Documentation Incomplete
CY47	1411	21-May-97	2	Support Documentation Incomplete
CY47	1411	23-May-97	2	Partial Route Less Than 8 Hours
CY47	1411	24-May-97	2	Support Documentation Incomplete
CY47	1411	27-May-97	2	Support Documentation Incomplete
CY47	1411	28-May-97	2	Support Documentation Incomplete
CY47	1411	29-May-97	2	Support Documentation Incomplete
CY47	1475	2-Jul-97	2	Missing Scans
CY47	1475	17-Jul-97	2	Support Documentation Incomplete
CY47	1475	24-Jul-97	2	Support Documentation Incomplete
CY47	1507	5-Sep-97	2	Equipment Problems
CY47	1507	12-Sep-97	2	Partial Scans
CY47	1508	2-Jun-97	2	Support Documentation Incomplete

Route Days not Included in LR-I-337

Unit	Route	Date	Phase	Comments
CY47	1508	3-Jun-97	2	Equipment Problems
CY47	1508	5-Jun-97	2	Support Documentation Incomplete
CY47	1508	6-Jun-97	2	Support Documentation Incomplete
CY47	1508	7-Jun-97	2	Support Documentation Incomplete
CY47	1508	9-Jun-97	2	Support Documentation Incomplete
CY47	1508	11-Jun-97	2	Partial Scans
CY47	1508	12-Jun-97	2	Support Documentation Incomplete
CY47	1508	14-Jun-97	2	Support Documentation Incomplete
CY47	1508	19-Jun-97	2	Equipment Problems
CY47	1508	26-Jun-97	2	Support Documentation Incomplete
CY47	1508	27-Jun-97	2	Support Documentation Incomplete
CY47	1508	28-Jun-97	2	Partial Scans
CY47	1586	18-Aug-97	2	Partial Scans
CY47	1586	23-Aug-97	2	Partial Route Less Than 8 Hours
CY48	0337	17-May-97	2	Partial Route Less Than 8 Hours
CY49	0101	7-May-97	2	Support Documentation Incomplete
CY50	8701	2-Jun-97	2	Equipment Problems, Partial Scans
CY50	8701	3-Jun-97	2	Missing Scans
CY50	8717	5-May-97	2	Support Documentation Incomplete
CY50	8717	6-May-97	2	Support Documentation Incomplete
CY50	8717	7-May-97	2	Partial Route Less Than 8 Hours
CY50	8717	19-May-97	2	Equipment Problems
CY50	8717	20-May-97	2	Equipment Problems
CY50	8717	28-May-97	2	Equipment Problems
CY50	8735	21-Jul-97	2	Partial Scans
CY50	8735	22-Jul-97	2	Equipment Problems
CY50	8735	23-Jul-97	2	Support Documentation Incomplete
CY50	8759	30-Jul-97	2	Equipment Problems
CY50	8759	4-Aug-97	2	Support Documentation Incomplete
CY50	8759	18-Aug-97	2	Partial Scans
CY50	8759	19-Aug-97	2	Support Documentation Incomplete
CY51	6419	30-May-97	2	Support Documentation Incomplete
CY51	6419	31-May-97	2	Support Documentation Incomplete
CY52	1111	6-Jun-97	2	Partial Scans
CY52	1111	7-Jun-97	2	Route Interference (Union)
CY52	1121	14-Jun-97	2	Equipment Problems
CY53	0374	17-Dec-97	2	Route does not exist in National Database.
CY53	2215	28-Jun-97	2	Incomplete data set
CY53	2227	20-Jun-97	2	Equipment Problems
CY58	8212	14-Jul-97	2	Multiple Carriers on Route

Route Days not Included in LR-I-337

Unit	Route	Date	Phase	Comments
CY60	1917	11-Jul-97	2	Route Interference (Union)
CY61	4271	14-Jul-97	2	Partial Scans
CY61	4273	26-Jul-97	2	Support Documentation Incomplete
CY63	0825	11-Aug-97	2	Equipment Problems
CY66	0106	13-Nov-97	2	Carrier involved in non-route related activities
CY66	0256	14-Jan-98	2	Missing Scans

DECLARATION

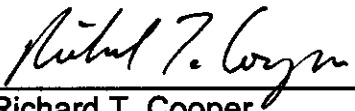
I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 6-7-00

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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June 7, 2000