

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
MPA WITNESS CROWDER  
(USPS/MPA-T5-4-9)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Crowder: USPS/MPA-T5-4-9. To the extent that any particular question in this set may be read to require disclosure of confidential information in violation of Presiding Officer's Ruling No. R2000-1/27, it is requested that an unredacted response containing the confidential information be filed under seal in conformance with Ruling 27 and provided to the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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June 12, 2000

USPS/MPA-T5-4. On page 2, footnote 1 of your testimony, you state that "true load time" is as defined in the Load Time Variability (LTV) study. Please provide a complete statement of what you understand that definition to be, with all relevant citations to underlying source materials.

USPS/MPA-T5-5. On page 6 of your testimony, lines 5 and 6, you indicate that one of the objectives of witness Raymond's Engineered Standards/Delivery Redesign project was "validation of the workload management system." Please explain fully what you mean by "validation of the workload management system." Please also provide the complete basis for your belief that this was an objective, including citations to the testimony of witness Raymond.

USPS/MPA-T5-6. On page 9, lines 10-12 of your testimony, you state that "time studies interrupted and took precedence over the work sampling." Please provide the complete basis for this statement, including citations to the testimony of witness Raymond.

USPS/MPA-T5-7. How many time studies did you and/or your team perform in total? Please identify each time study, including when it was performed, where it was performed, which team members performed the study, what functions were performed by each team member for each particular study, and what route number and tape number was being studied. Include any partial studies.

USPS/MPA-T5-8. If more time studies were undertaken by you than were identified in your testimony and associated work papers, please provide a detailed explanation as to why these time studies were not included as part of your work papers and testimony.

USPS/MPA-T5-9. Please provide all documentation relating to all time studies undertaken by you and/or by your team, including not only those performed at Merrifield, Virginia, but also any time studies performed during later reviews of tapes at locations other than Merrifield, Virginia. Include any partial studies.

**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.

  
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