

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-T5-10-22)

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-T5-10-22. 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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(202) 268-2993 Fax -5402  
June 14, 2000

**USPS/MPA-T5-10.** Please identify each member of your team, including yourself, by employer, position title, age and occupation. For each team member, list all work experiences, educational experiences, credentials or degrees that would enable them to perform time studies of Postal Service operations. For each team member, please provide a complete description of their prior experiences studying Postal Service operations, including your best estimate of the amount of time each spent studying Postal Service operations prior to viewing the videotapes studied by the team.

**USPS/MPA-T5-11.** Please provide the: make, model, manufacturer, year of manufacture, serial number and any other available identifying information of the stopwatches or other time-keeping equipment used to take the time studies described in your testimony.

**USPS/MPA-T5-12.** Did you test the stopwatches or other timekeeping devices used in your time studies to determine if they were accurate? If so, please provide a complete description and all documentation of the testing process.

**USPS/MPA-T5-13.** Were the stopwatches or other timekeeping devices used in your time studies certified for use in the performance of time studies? If yes, please provide complete documentation of the certifications.

**USPS/MPA-T5-14.** Please describe all problems encountered during the time study process and the solution implemented to overcome each problem.

**USPS/MPA-T5-15.** Please provide a complete description of all instructions (including verbal instructions) and training provided to each member of your team. To the extent that you have not already provided them, please provide all written instructions, training materials or other documentation of instructions and/or training given to each team member.

**USPS/MPA-T5-16.** Please provide all work papers and spreadsheets used in the time study process to the extent you have not already done so. In addition, please provide electronic copies of all such work papers and spreadsheets, to the extent such electronic versions were used.

**USPS/MPA-T5-17.** Please identify all ES study videotapes that were viewed by you, and the dates on which you viewed each.

**USPS/MPA-T5-18.** Prior to performing your time studies, were you aware of the differences between continuous and snapback stopwatch techniques for taking time studies? Please explain fully.

**USPS/MPA-T5-19.** Please describe in complete detail the techniques you and/or your team members used to perform the time studies.

**USPS/MPA-T5-20.** If a carrier travels to a delivery point and opens and closes a box to check for a collectable, do you define any portion of this activity as Load time? If so, what portion? Explain your answer fully.

**USPS/MPA-T5-21.** If a carrier pauses and/or stops on a route to observe a delivery point, do you define any portion of this activity as Load time? If so, what portion? Explain your answer fully.

**USPS/MPA-T5-22.** During your review of videotapes, did you note when a tone was heard indicating a work sampling observation should have been made? If so, please provide all such notes and any related documents reflecting the occurrence of such tones. If you did not consistently note such tones, please explain the circumstances under which you did and did not make such notes, and the rationale for taking or not taking such notes.

**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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