

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

RESPONSES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
WITNESS CROWDER TO INTERROGATORIES OF THE
UNITED STATES POSTAL SERVICE (USPS/MPA-T5-10-22)

(June 28, 2000)

The Magazine Publishers of America hereby submits the responses of witness Crowder to interrogatories USPS/MPA-T5-10-22, filed on June 14, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



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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.

RESPONSE:

There were seven members to the MPA videotape team. I am the only one with previous experience in studying Postal Service operational costs and my resume is included in MPA-T-5. The other six individuals were taught by me to recognize the difference between "stop," "other stop," and "inter-stop" time for carriers, as described in MPA-LR-7. As described in MPA-LR-7, we reviewed the descriptions of "stop," "other stop," and "inter-stop" time and practiced examples. Either Ms. Lindsay Turpin or I were part of each two-person team taking data, and, to be available for questions and spot-check the process, I was always present while the tapes were being observed.

Name	Employer	Position	Age	Occupation
C. Casey	Burzio & McLaughlin	Paralegal	23	Paralegal
A. Crowder	TRANSCOMM, Inc.	Consultant	53	Consultant
S. Crowder	TRANSCOMM, Inc.	Contractor	17	High School Student
D. Maddux	TRANSCOMM, Inc.	Office Manager	47	Office Manager
M. Davis	Magazine Publishers Association	Contractor	39	Legal Support
B. Meurrens	Project Performance Corporation	Analyst	27	Consultant
L. Turpin	Project Performance Corporation	Research Assistant	23	Consultant

USPS/MPA-T5-11. Please provide the: make, model, manufacturer, year of manufacturer, 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.

RESPONSE:

We used five stopwatches, all of which were purchased at the same time from the same store. The purchase was made early in April 2000. The name of the watch is the TP Sports No. SW1. The manufacturer is The Dreier Co., Inc., E. Brunswick, NJ., and the watch was made in China.

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.

RESPONSE:

No. However, as a double-check on the stopwatch times, I occasionally viewed a portion of a tape without a stopwatch, relying on the clock time imprinted on the video (showing the hour, minute, and second) to visually estimate the load time at each delivery to the nearest full second, rounded up. The total load time from the stopwatch technique was consistently close to the load time estimated from the video clock technique.

I also note that the videotapes are available for independent analysis by the Postal Service and the Commission.

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 certification.

RESPONSE:

Not to my knowledge. Also see my response to USPS/MPA-T5-12.

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

RESPONSE:

We encountered two general types of problems: (1) quality issues with the videotaping and (2) occasional questions involving identification or interpretation of the activity being observed. I discuss these in my testimony at page 42 and in MPA-LR-7 at pages 2-3.

As we conducted our data collection, the decision rules were developed to accommodate the videotape conditions. For the routes presented in MPA-LR-7, Ms. Turpin and I applied the following decision rules to accommodate what we were viewing:

- If there was no load time in a particular tape sequence, then that sequence time was not included
- If a tape sequence contained only a partial load activity, then that sequence time was not included
- Within a sequence, all loading and walking was included, even if a beginning or ending portion of a load or walk was cut off
- All load activity was timed within a sequence, even if the time had to be estimated because the carrier was out of sight of the camera
- If the carrier walked out of sight of the camera and could not subsequently tracked, we stopped timing at the moment he disappeared from view
- Any time when the carrier was stopped was recorded as either "other stop" or "stop" (i.e., load) time. As described in MPA-LR-7, it was "stop" time if the carrier was conducting "true" load activities. When the carrier was waiting for traffic or other clearance while walking, that time was generally recorded as "other stop" rather than "inter-stop" .
- If, at the delivery point the carrier stopped initially and then moved and stopped again (i.e., as in moving between two mailboxes at essentially the same stop, or stopping on a porch and then moving to the mailbox), that entire time was recorded as stop (load) time

- Even if not considered "true load", most customer interaction before, after, or during a load was included
- Time at the delivery point incurred while waiting for a customer to respond was included

Conduct with respect to the data analysis is described in MPA-LR-7. The analysis was essentially a comparison of the videotape data to ES data for comparable time periods -- as shown through the ES tallies, Forms 3999X, ES time studies, observer comments, etc.). Because the data varied considerably, the comparisons also varied. I used whatever I had available to make the comparisons. The intent was to match comparable videotape data to ES activity sampling tally data to determine consistency between the two with respect to the ratio of load time to the sum of load plus FAT (i.e., walking) times. When making comparisons, duplicate ES tallies, ES tallies that appeared to involve unusual or non-park & loop/routine dismount activity not recorded on the videotapes, or tallies for portions of the day that were clearly different from those included in the videotape were not used to develop the comparable ES time proportions. Since this was necessarily a judgmental process, a basic decision rule in calculating the ES tally load time was to make conservative choices that would err on the side of reducing the ES tally proportion of load time vs. the sum of load plus FAT time.

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.

RESPONSE:

See MPA-LR-7. Verbal and written instructions were the same as those shown in the library reference, with the caveat that if anyone had any questions about procedures or what activities to record as load time, they should check with me for specific guidance. I was available at all times to help with any questions. Training occurred before any tapes were observed and, in some cases, training continued during our three days at Merrifield, as we were all getting used to viewing the tapes and recording information. This is one reason why, although I felt somewhat comfortable with the data collected at Merrifield, I believed it would be necessary to review the tapes again and completely re-time them to ensure accuracy and consistency.

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.

RESPONSE:

See MPA-LR-7 filed with my testimony and MPA-LR-8 filed in response to USPS/MPA-T5-7.

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

RESPONSE:

See MPA-LR-7 for the ES routes and days for which I was involved as a data collection team member. These are all for observations made at Merrifield. In addition, after MPA received copies of the tapes, I did briefly review several routes to get a "feel" for them. I do not recall the specific dates or routes. But, I have probably viewed in whole or in part all the 11 routes included in MPA-LR-7, many of the original 29 routes, and a few of the other routes that happened to be on the videotapes given to us.

In addition, as a means of checking on observer progress and consistency, I would briefly stop my other activities and view some videotapes from time to time, while other individuals were making observations. Also, when time permitted, I reviewed certain tape segments while conducting my analysis of the data.

Since testimony was filed, I have again briefly reviewed certain taped segments of route-days, to further check for consistency and accuracy. Together with Ms. Turpin, I have reviewed some tapes and data in the past week, to confirm the consistency of application of our decision rules and to check certain notations in our data.

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.

RESPONSE:

No

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

RESPONSE:

Please see MPA-LR-7 and responses to MPA/USPS-T5-14 and 15.

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? Is of, what portion? Explain your answer fully.

RESPONSE:

If a carrier accessed a mail receptacle or approached a customer to take a piece of collectible mail, that time was included in load time. Please see the definitions and instructions in MPA-LR-7.

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.

RESPONSE:

I am not sure what is meant by a carrier pausing or stopping on a route "to observe a delivery point." Ms. Turpin and I do not recall seeing any such behavior. Please see MPA-LR-7 and response to MPA/USPS-T5-14.

However, we have viewed a carrier who stopped at a delivery point to apparently check as to whether anyone was there. That time was recorded as load ("stop") time. And, in another case, we viewed a carrier who stopped to deliver a parcel, waited for a response from the customer, and then, when no response came, apparently took the parcel to the backside of the house to drop off (he was out of view while at the backside of the house) and then returned to his line of travel. Despite the fact that he was walking some of this time, it was all included as load time (i.e., a non-routine delivery).

Those examples are noted in our data sheets.

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.

RESPONSE:

We made no systematic effort to note the scanner beeps. First, we never planned to systematically identify and check the activity sampling beeps, although we were aware of the fact that we may hear some. (I expected that we would be unlikely to hear many beeps on the videotapes, especially on park & loop segments, because the person doing the videotaping would not necessarily be close enough to the person with the scanner to hear the beeps on the tape.) As shown in the data collection materials presented in MPA-LR-7, our focus was on accurately measuring load and foot access time. Second, we found that turning up the volume on the videotapes was distracting (dogs barking, data collectors talking, etc.), especially with two teams making observations in the small room at Merrifield. Third, I was unsure of how synchronized the Videx barcode scanner and the video camera were and I knew that there were delays between when an activity sampling beep took place and when the observation was recorded into the scanner. And, finally, even though it appeared that a few scanner beeps could be heard, I simply did not have any additional time to investigate that approach further.

However, there were a few times when we heard a beep and noted it. I checked these with the ES tally data. In some cases, the beep appeared to be associated with an accurate ES tally and, in some cases, a beep appeared to be associated with an inaccurate ES tally. An example is CY60, Route 1913, on July 5, 1997. There are two apparent beeps on the video tape. The first, at 12:42:37 PM on the videotape clock, occurred precisely as the carrier was making a very quick 2-

second delivery in between long walks, and was correctly scanned at 12:45 PM as a point of delivery tally, assigned to load. The second, eighteen minutes later at 1:00:40 PM on the videotape, occurred after the carrier had walked away from a house, but was incorrectly scanned at 1:03 PM as point of delivery, assigned to load. In other cases, however, the observed and recorded times (and sometimes also the observed and recorded descriptions) were so disparate, that it made me uncertain of what the tones on the videos signified. Accordingly, I was concerned about the possibilities of large time differences between the videotapes and the ES tally data and/or that the beeps may be the result of other ES observer Videx activities.

DECLARATION

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

A handwritten signature in cursive script that reads "Antoinette Crowder". The signature is written in black ink and is positioned above a horizontal line.

ANTOINETTE CROWDER

Dated: June 28, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read 'T. W. McLaughlin', is written over a horizontal line.

Thomas W. McLaughlin

June 28, 2000