

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-T5-30-31)

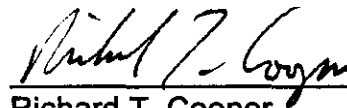
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Crowder: USPS/MPA-T5-30-31. To the extent that any particular question in this set may be read to require 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 28, 2000

USPS/MPA-T5-30. Please refer to your Testimony at page 14 line 19 through page 15 line 2. Please present and describe all evidence, other than what you present on page 6 of MPA-LR-7 (MPA's Videotape Analysis), quantifying directly or indirectly the frequency by which ES data collectors identified carriers engaged in the route/access FAT activity as being at the "point of delivery."

USPS/MPA-T5-31. Please refer to page 3 of MPA-LR-7 (MPA's Videotape Analysis). You state:

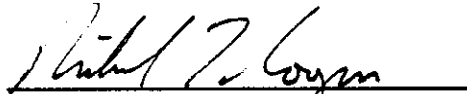
One person tracked and recorded the clock time (from the tape) for (a) the beginning and ending of each tape sequence and (b) either the beginning or ending of each load activity. That person also noted descriptive information about the delivery types and conditions. The second person used a stop watch to time the load activities and assist in identifying the beginning and ending times for each tape sequence.

Please answer the following:

- (a) Please define the term "tape sequence."
- (b) Is the person who "tracked and recorded the clock time...for (a) the beginning and ending of each tape sequence and (b) either the beginning or ending of each load activity," the same as the person that is later identified (on page 8) as the "delivery recorder?" If your answer is no, then is this person the same person that is later identified (page 8) as the "stop recorder?" Please explain fully.
- (c) Is the person who "used a stop watch to time the load activities and assist in identifying the beginning and ending times for each tape sequence" the same as the person later identified as the "stop recorder?" If your answer is no, then is this person the same person that is later identified as the "delivery recorder?" Please explain fully.
- (d) Assuming that your answer to part (b) is yes, please explain why on page 3 you state that the delivery recorder recorded "either the beginning or ending of each load activity," whereas on page 9 you state that the delivery recorder recorded only "the end time for each Stop Time."
- (e) Assuming that your answer to part (c) is yes, please note that on page 3, you state that the stop recorder "used a stop watch to time the load activities and assist in identifying the beginning and ending times for each tape sequence," whereas on page 9 you state that the stop recorder may have only recorded the "start and end times" as an alternative to recording the entire elapsed time. Also, on page 9, you do not state that the stop recorder assisted "in identifying the beginning and ending times for each tape sequence." Please explain these apparent discrepancies.

**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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