

**RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA WITNESS HAY
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE
(USPS/MPA-T-4-1-7)**

USPS/MPA-T4-1. Please provide a complete listing of all publications that you have authored or co-authored.

Response:

Please see attached partial list of publications and reports.

USPS/MPA-T4-2. Please fully describe your experience in observing and analyzing the operations of the United States Postal Service. In particular, describe your experience in observing and analyzing city carrier delivery operations. In your description, include all pertinent time periods, specific operations, facilities, Postal Service personnel with whom you had contact, and geographic locations.

Response:

None.

USPS/MPA-T4-3. Please fully describe your involvement, if any, with witness Raymond's Engineered Standards Study. In your response, indicate the time period in which you first examined the methods employed in that Study, as well as the work-sampling data collected in that study. In addition, please describe all sources of your knowledge regarding that Study.

Response:

I was in no way "involved" with the work presented by witness Raymond to the rate case, described as Raymond's Engineered Standards Study. To my knowledge no such "Study" exists. In my capacity as a witness for the MPA, I was made aware of witness Raymond's testimony and viewed various documents associated with it, after they were filed with the Commission. I have since discussed them with witness Crowder and counsel.

USPS/MPA-T4-4. When did you first become involved in the Data Quality Study mentioned at page 3 of your testimony?

Response:

Please see my answer to NAA/MPA-T4-1(a).

USPS/MPA-T4-5. Please provide copies of all contracts, agreements (including confidentiality and non-disclosure agreements), task orders, job descriptions, work proposals or other documents relating to your duties on the Data Quality Study.

Response:

Please see the attached contract. There are no other documents.

USPS/MPA-T4-6. Please provide all memos, notes, or other documentation created by you or others in the course of your work on the Data Quality Study that relate to the potential uses of work sampling data collected during the Engineered Standards Study.

Response:

I have no such documents.

USPS/MPA-T4-7. At page three of your testimony, you state that you met often with the authors of the Data Quality Study and “discussed the various data quality issues at length.” Please provide the dates of all such meetings during which the work sampling data collected by witness Raymond was discussed, and for each such meeting, provide all notes or other documentation pertaining to that discussion. For each such meeting, also list the attendees of the meeting.

Response:

I was not present at any meeting where the subject of the work sampling data collected by witness Raymond was discussed. However, I was present at meetings when the general requirement for improved data quality based on acceptable scientific method, was discussed at length. I can also conclude, based on the rigor attached to the research, analysis, and discussion of other recommendations that the DQS team made, that the recommendations with regard to the Delivery Redesign work were thoroughly researched and investigated. And finally, I can with confidence say that the recommendations made were quite unambiguous and proposed up-dating the special studies and becoming involved with the Redesign project *so as to insure that future work* was of a satisfactory quality to enable it to be used for rate making.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.



Anne R. Noble

Washington DC
JULY 3, 2000