

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

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POSTAL RATE AND FEE CHANGES, 2000


Docket No. R2000-1

RESPONSES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
WITNESS CROWDER TO INTERROGATORIES OF THE
NEWSPAPER ASSOCIATION OF AMERICA (NAA/MPA-T5-1-8)

(July 3, 2000)

The Magazine Publishers of America hereby submits the responses of witness Crowder to interrogatories NAA/MPA-T5-1-8, filed on June 19, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



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NAA/MPA-T5-1. Please refer to your testimony at page 14, lines 19-21, where you state “[t]his confusion over ‘point of delivery’ is evident in tallies Mr. Raymond assigned to load that show the carrier’s activity as walking or traveling between deliveries while supposedly at the ‘point of delivery.’”

- a. Please state the total number of such allegedly misassigned tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

RESPONSE:

a. and b. I have not made these analyses as specified, however, the tallies can be found in USPS LR I-163 and I-281; and examples can be found in Mr. Raymond’s responses to MPA/USPS-T13-96 and 123. There are a number of tallies assigned to Load Time which have activity or activity detail codes which indicate walking or traveling between deliveries and apparently are not actually at “point of delivery” as defined by Mr. Raymond to mean: “The carrier had finished accessing/traveling to and was located at the point of delivery.” The following is a listing:

For Point of Delivery Location tallies assigned to Load Time:

Activity Codes: Finger @ Delivery (LLV detail and Dismount delivery type)
 Travel b/t Delivery (LLV detail)
 Parcel (walk flat detail)
 Travel b/t Delivery (walk flat detail)
 Travel b/t Delivery w/sort (walk flat detail)
 Accountable (walking detail)
 Travel b/t Delivery (#1 Box detail)
 Walking (Central Inside detail)
 Delivery/Collection (walking detail)
 Walking (Central Outside detail)
 Walking (walk flat detail)
 No Access to Box (parking unavailable detail)
 No Access to Box (#1 Box detail)
 Travel b/t Delivery (Central Outside)
 Finger @ Delivery (LLV detail for Dismount delivery type)
 Accountable (walk flat detail)
 No Access to Box (N/A detail)
 Travel b/t Delivery (1 Hand Slam detail)
 Hardship (LLV detail for Dismount delivery type)

No Access to Box (Central Inside detail)
Parcel (walking detail)
Travel b/t Delivery (Walk obstructed detail)
Travel b/t Delivery (Drop to customer detail)
No Access to Box (Multiple box type detail)
Delivery/Collect (LLV detail for Dismount delivery type)
Return to Unit (LLV detail)

For On Route Location tallies assigned to Load Time:

Activity Code: Delivery/Collection (walking detail)
Accountable (walk flat detail)
Finger @ Delivery (walk flat detail)
Parcel (walk flat detail)
Walking (walk flat detail)
Delivery/Collection (walk flat detail)

For Vehicle or Park Point Location tallies assigned to Load Time:

Activity Code: Finger @ Delivery (LLV detail for Central delivery type)
Delivery/Collection (various detail codes for Dismount
delivery type)
Delivery/Collection (for various detail codes for Park & Loop
delivery type)

The significance of these tallies goes beyond their number. Walking or traveling between deliveries are activities that are clearly inconsistent with load and are particularly inconsistent with Mr. Raymond's definition of the "Point of Delivery" location. For the "Point of Delivery" location tallies, these are clear examples that data collectors construed the terms "Point of Delivery," "Delivery/Collection," and "Finger at Delivery," in a broad manner that goes beyond the true load time definition. In many other instances, I suspect that this kind of activity is masked by the overuse of receptacle codes, as discussed in my testimony.

Despite this clear inconsistency, in response to MPA/USPS-T13-123(aa)-(mm), Mr. Raymond persists in assigning these types of "Point of Delivery" tallies to Load Time, with curt statements that "The activity of 'Travel B/t Dlvr' is ignored" or "The activity of walking is ignored."

The same problem occurs for load tallies with an "On Route," "Vehicle," or "Park Point" location and activity or activity detail codes indicating travel between delivery or walking. Mr. Raymond classified such tallies as Load Time even though other tally information (such as a dismount or inside delivery type, or an LLV vehicle code or "Travel B/t Delivery" code) is inconsistent with true load activity. In his response to MPA/USPS-T13-123(oo)-(tt), he simply "ignores" the other codes associated with "Vehicle" location tallies and presumes that a "Del/Coll" code is correct and controlling even when the other codes conflict with this conclusion. (In response to MPA/USPS-T13-123(d)-(r), he does admit that some, but not all, of the "On Route" tallies were mis-allocated to Load Time.) In essence, he presumed that a "Delivery/Collect" code is correct and controlling even when other information conflicts with this conclusion. These tallies again are evidence that data collectors construed "Delivery/Collect" in a manner broader than the true load definition, a problem that may extend to many of the seemingly unambiguous but numerous "Point of Delivery," "Vehicle," and "Delivery/Collect" tallies that are associated with mail receptacle activity detail codes.

The larger unquantifiable problem, of course, is the extent to which these kinds of non-load activities were ignored or overlooked by the data collectors in recording activities near the delivery point as being at the delivery point, with the "Delivery/Collect" and receptacle code entries masking the true activity.

NAA/MPA-T5-2. Please refer to your testimony at page 14, footnote 9, where you state “[a]nother example are point of delivery tallies for dismount deliveries with an LLV (vehicle) activity which he assigned to load.”

- a. Please state the total number of such allegedly misassigned tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

RESPONSE:

I have not made these analyses as specified, however, the tallies can be found in USPS LR I-163 and I-281, and examples can be found in Mr. Raymond’s response to MPA/USPS-T13-123. Please also see my response to NAA/MPA-T5-1.

The LLV vehicle code means that the carrier is presumably in his vehicle, inconsistent with his being at the “point of delivery” on a dismount which by definition requires that the carrier dismount the vehicle to make a delivery. Mr. Raymond simply ignores the LLV code, as well as other information such as “Travel B/t Delivery” codes, that are plainly inconsistent with true load activity. See, e.g., his response to MPA/USPS-T13-123(gg). In essence, he presumes that a “Point of Delivery” location tally is correct and controlling even when other information conflicts with this conclusion. These tallies again are evidence that data collectors construed “Point of Delivery” in a manner broader than the true load definition, a problem that I believe extends as well to many of the seemingly unambiguous “Point of Delivery” tallies.

NAA/MPA-T5-3. Please refer to your testimony at page 15, lines 7-8, where you state that "he assigned a number of 'on route' tallies to load."

- a. Please state the total number of such allegedly misassigned tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

RESPONSE:

I have not made these analyses as specified, however, the tallies can be found in USPS LR I-163 and I-281, and examples can be found in Mr. Raymond's response to MPA/USPS-T13-123. Please also see my response to NAA/MPA-T5-1.

Mr. Raymond assumes, for example, that tallies with an "On Route" location and a "Del/Coll" activity mean that the carrier is really "at a delivery point." Response to MPA/USPS-T13-123(e). Yet he defined "On Route" to mean that the "carrier is not at another listed location" (Response to MPA/USPS-T13-39), meaning that the carrier is *not* at the point of delivery. In essence, he presumes that a "Del/Coll" activity tally is correct and controlling even when other information conflicts with this conclusion. These tallies again are evidence that data collectors construed "Del/Coll" in a manner broader than the true load definition, a problem that I believe extends as well to many of the seemingly unambiguous "Del/Coll" tallies.

NAA/MPA-T5-4. Please refer to your testimony at page 15, lines 8-9, where you state that “[i]kewise, the location of the ‘vehicle’ overlaps with other locations, such as ‘point of delivery,’ on curbside deliveries.”

- a. Please state the total number of such allegedly overlapping tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

RESPONSE:

I have not made these analyses. There are sixteen location codes listed in Appendix D of USPS-T-13. Of those, it appears that the Vehicle location could overlap all but “In Unit Walking” and “Wait When Walking.” These location codes can be found in USPS LR I-153 and I-281.

Tallies with the following Location Codes were assigned to Load Time:

Location Code: In Vehicle at Stop (Curb delivery code)
 Miscellaneous (Curb and Dismount delivery codes)
 N/A (N/A and Central delivery code)
 On Route (all delivery codes except N/A)
 Other Route (Curb delivery code)
 Park Point (Park & Loop delivery code)
 Point of Delivery (all delivery codes except N/A)
 Vehicle (all delivery codes except N/A)

Mr. Raymond assumes, for example, that tallies with a “Vehicle” location and a “Del/Coll” activity mean that the carrier is really “at a delivery point.” Response to MPA/USPS-T13-123(oo-tt). Yet he classifies all such tallies as Load even though in some cases the other tally information (such as a dismount or inside delivery type, or an LLV vehicle code or “Travel B/t Delivery” code) is inconsistent with true load activity. He “ignores” these codes that contradict load. In essence, he presumes that a “Del/Coll” activity tally is correct and controlling even when other information conflicts with this conclusion. These tallies again are evidence that data collectors construed “Del/Coll” in a manner broader than the true load definition, a problem that I believe

extends as well to many of the seemingly unambiguous "Del/Coll" tallies that indicate a "Vehicle" location. Please also see my response to NAA/MPA-T5-1.

NAA/MPA-T5-5. Please refer to your testimony at page 16, lines 4-7, where you state that "for load operations which occur quickly (e.g., only a few seconds), data collectors probably had difficulty discerning whether a 'beep' that occurred around that time actually coincided with the quick load, or shortly before or after that load, which should have been access time." Please provide the basis for this assertion.

RESPONSE:

First, the accuracy and reliability of the tallies assumes that all ES data collectors had been carefully instructed in distinguishing the costing nuances of "true load time" v. non-load activities and were actually trying to assign the delivery/collect code to only activities which would constitute true load time. As explained in my testimony, I do not believe that was the case.

Moreover, assuming that they were trying to record only "true load time," unless the data collectors were being especially vigilant when the beep occurred, they could have been unprepared to look for the specific load activities which constitute "true load time." See also footnote 12 on the page cited. My experience in watching the videotapes is that many of the load activities, especially on park & loop delivery segments, occur very quickly. Unless the data collector is extremely alert and focused on the carrier's activities at the precise instant of the beep, non-load activities just prior to or following a delivery can easily be misrecorded as load. The fact that data collectors were instructed to record receptacle types "near the carrier" increased the likelihood that beeps which occurred when the carrier was near, but not at, the receptacle were recorded by the data collector as point of delivery with a receptacle type code. Another example is where receptacles (or small clusters of receptacles) are separated from one another by only a few steps. Technically, a beep that occurs as the carrier is moving from one receptacle (or cluster) to another should not be recorded as a load activity, but even in our video review we used the "shortcut" of counting all the time as load because of difficulty in making the distinction. See also, page 9, lines 10-12, of my testimony and my response to USPS/MPA-T5-6.

NAA/MPA-T5-6. Please refer to your testimony at page 18, lines 13-15, where you state “[i]n some cases, however, he admitted that he needed to reference the data collector comments log or the USPS Form 3999X. But, in most cases, I suspect even referring back to those items cannot be sufficient.” Please provide the basis for this assertion.

RESPONSE:

Please see USPS Expedited Opposition of USPS to MPA Motion to Compel Answers to Interrogatories MPA/USPS-T13-83, 85-90, 93-94, 96-97, 100-101, 106 & 108 to Witness Raymond. For example, see also Mr. Raymond’s response to POIR No. 8, his responses to UPS/USPS-T13-7 and 8 (and his response to followups on those UPS questions in ADVO/USPS-T13-145), and ADVO/USPS/T13-124 and 142.

Separately, as part of the videotape analysis, I reviewed the data collector comments logs and Forms 3999X associated with the videos that we watched. From those, I have a general understanding of the information in those records and how in some instances they can be useful in explaining specific ES tallies. In most instances, however, that information provides no assistance in interpreting a tally, or in determining whether the tally correctly recorded the carrier’s activity.

NAA/MPA-T5-7. Please refer to your testimony at page 23, lines 20-21, continued through page 24, lines 1-2, where you state “[i]n short, independent review and validation of a study requires an assessment of both the excluded data and the reasons for their exclusion. This has not been possible due to the extreme lateness of the disclosure of these problems and the inadequacy of Raymond’s explanations.” Please explain why Mr. Raymond’s explanations are inadequate.

RESPONSE:

First, without discovery, neither Mr. Raymond or Mr. Baron would have disclosed that there were excluded data. We were initially told that no route days had been purged (Response to ADVO/USPS-T13-16). Only by analysis of responses to unrelated interrogatories (concerning identification of data collectors by route) were we able to determine that there might be a mismatch between the route days in LR-I-163 and total observed route days.

Second, Mr. Raymond’s explanations of why the data were excluded from LR I-163 do not completely comport with the fact that, in response to ADVO/USPS-T13-23(b) (USPS LR I-292), he has supplied statistical comparisons between the routes which he calls “random” and those which he calls “Postal Service selected.” These comparisons include more than the 340 routes and 845 days of ES data included in USPS LR I-163 (LR I-292 appears to include data from 1020 routes). And, these comparisons apparently are the basis for Mr. Raymond’s assertions that: “Based on the comparison of the data we collected from the random routes to the Postal Service selected routes we feel the all data should be considered as random and representative of the population.” (Responses to OCA/USPS-T13-1(b) and ADVO/USPS-T13-54) See also responses to OCA/USPS-T13-6 and NAA/USPS-T13-6.

Third, it appears that, for the routes in USPS LR I-163, there are days which apparently were observed (at least they were videotaped and volumes were collected) but were not included in LR I-163. The apparent exclusion of those data was never even identified until late in the discovery process and was never discussed by Mr.

Raymond. The only "explanation" was given in a post-hearing response received after my testimony was filed. There, he identifies a number of route-days that were excluded supposedly because they were "partial route less than 8 hours," "partial scans," or "multiple carriers on route." See Response of the United States Postal Service Witness Raymond to Questions Posed at the Hearing, June 7, 2000. But his subsequent post-hearing response shows that many of these route-days ranged from seven to eleven hours long, with from 70 to more than 110 tallies -- substantially longer and with more tallies than some of the route-days that he included in his LR-I-163 dataset. Compare Response of the United States Postal Service Witness Raymond to Information Request Made At Hearing, June 14, 2000 with Raymond's response to MPA/USPS-T13-56, Tr. 7915-31. We still do not know the criteria by which some shorter route-days (as short as 55 minutes and with only 13 tallies) were included in LR-I-163, while longer route-days (as long as 11:33 hours and up to 119 tallies) were excluded.

Had this information on excluded data been provided at the outset of the case -- as USPS witness Bradley did in his Docket R97-1 testimony analyzing HCSS data (see USPS-T-13 at 46ff, Docket R97-1, discussed in my response to UPS/MPA-T5-1(c)) -- we would have time to assess and test whether Mr. Raymond's still unknown criteria for inclusion or exclusion of data were justifiable, or whether some other criteria would better suit ratemaking costing purposes.

NAA/MPA-T5-8. Please refer to your testimony at page 28, lines 16-17, where you state "I do not believe the ES sample of 340 routes with an unweighted sampling ratio of 0.2% of total Postal Service routes is adequate to fully represent the above conditions. . ." Please provide a sampling ratio, or range of sampling ratios, that you believe would be adequate.

RESPONSE:

I am not sure what sampling ratio you are requesting, but, for purposes of this testimony, I have not estimated any sampling ratios. Sampling ratios depend upon the purpose of the project, the study design, the population involved, and other study considerations. Please refer to the testimony of MPA witness Hay for an explanation of what is involved to design a study and, for that study, determine an appropriate sampling ratio or range of sampling ratios. (MPA-T-4, especially pages 8-12). As he explains, appropriate sampling ratios should be developed prior to the conduct of a study, not during or after it is completed. In any event, because of the non-random and non-representative nature of the ES sample, the sampling ratio is meaningless. An even larger sample, but conducted on the same non-scientific basis, would not overcome this problem.

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.

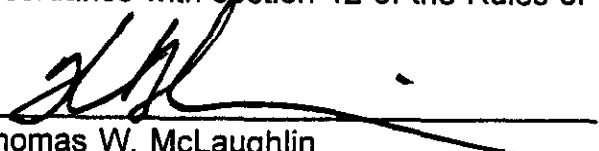
A handwritten signature in cursive script that reads "Antoinette Crowder". The signature is written in black ink and is positioned above a horizontal line.

ANTOINETTE CROWDER

Dated: July 3, 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.


Thomas W. McLaughlin

July 3, 2000