

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

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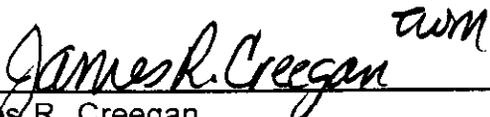
Docket No. R2000-1

RESPONSES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
WITNESS CROWDER TO INTERROGATORIES OF THE
UNITED STATES POSTAL SERVICE (USPS/MPA-T5-30-31)

(July 12, 2000)

The Magazine Publishers of America hereby submits the responses of witness Crowder to interrogatories USPS/MPA-T5-30-31, filed on June 28, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



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USPS/MPA-T5-30. Please refer to your Testimony at page 14 line 19 through page 15 line. 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."

RESPONSE:

I have attempted to provide all the evidence I have been able to accumulate on this subject in my testimony and interrogatory responses. As stated in response to USPS/MPA-T5-22, we never attempted, in the videotape analysis, to quantify 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.'"

Moreover, I believe it is impossible to either (1) "directly" quantify the extent to which Mr. Raymond's allocation of ES tallies among the STS categories overstates the true load proportion and understates the true route/access FAT proportion for the ES route-days included in LR I-163; or (2) pinpoint and quantify all the reasons why there is such an overstatement of load and understatement of FAT run time. My necessarily limited analysis of ES videotapes of park & loop route-days clearly shows that the comparable ES tally proportions of "Load" and "Route/Access FAT" do not comport with the actual (ratemaking costing) proportions observed on the videotapes. Instead, it indicates that, for those routes or route-segments, the ES Load Time proportion is too large and the ES Route/Access FAT Time proportion is too small.

A core problem in trying to determine precisely what the ES data collectors were observing, of course, is the impenetrability of the ES tallies. LR I-163 is like a "black box" where all you see is the output. We know what the data collector recorded, but we can never be sure if the resulting tally accurately reflected the carrier's actual activity at that instant or if the data collector's interpretations of that activity match the load time definitions used for costing purposes. As explained in testimony (pages 7-

19), there are a number of reasons why the ES tallies cannot be considered a precise (costing for ratemaking) description of what carrier activity was actually being observed when the Videx Timewand II scanner made its "beep."

However, the regression analyses of the ES data presented in my testimony, and by Mr. Baron in LR I-310 and subsequent documents, indirectly demonstrate that the ES estimate of load time is considerably greater than "true load time" in the system. The substantially lower volume variability derived from the ES data, compared to that from the LTV data, indicates that a portion of the tallies assigned by Mr. Raymond to the load category are not consistent with the definition of "true load time." Given the way in which the tallies were collected, it appears that a large (albeit unquantifiable) number of "Load" tallies were associated with carrier activity that did not include "true load time." (See also response to USPS/MPA-T5-4 and MPA-LR-7, pages 12-13.) This, of course, is why, if the inaccurate ES time proportions were to be used, they must be coupled with the lower ES variabilities from that same database.

RESPONSE OF MPA WITNESS CROWDER TO USPS INTERROGATORY

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 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 not, 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 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 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 the apparent discrepancies.

RESPONSE:

- (a) A tape sequence is an uninterrupted (or virtually uninterrupted) sequence of taped carrier activity time. Although the videotapes may have many minutes of out-of-

office time recorded, that recorded time was not continuous. Instead, sequences of carrier activity were recorded, sometimes throughout only a portion of the day and sometimes throughout the entire day. Some of these uninterrupted sequences may have lasted only a short time and some may have lasted several minutes. On pages 2 and 3 of Appendix B, I explained that many of the tapes recorded out-of-office activities for only small segments of time. The terms "segment" and "sequence" are used interchangeably there.

(b) As explained on page 7 of Appendix B, the descriptive material on pages 9 through 15 was the original data collection package developed for the videotape study prior to viewing any ES videotapes. It includes the stop, inter-stop, and other time definitions used in the study. And, those definitions are what we used as training material.

However, as explained on both pages 3 and 7 of Appendix B, after viewing some of the tapes, we almost immediately changed our data collection procedure to accommodate the conditions on the tapes. Only one individual in each team recorded data and that was either myself or Ms. Turpin. Thus, we were both "delivery recorder" and "stop recorder," while the second individual on the team handled the stopwatch and assisted with identifying clock time. We did not use the forms shown on pages 14 and 15 of Appendix B, we instead used lined paper. After each day of data collection, Ms. Turpin and I transcribed our handwritten notes onto Excel spreadsheets.

(c) Please see my response to (b) above.

(d) Please see my response to (b) above. There were two data recorders. I found it easier to record the beginning of each stop while Ms. Turpin found it easier to record

the end of each stop. Consequently, my data collection sheets show the beginning times for each stop while Ms. Turpin's show the ending times for each stop.

(e) Please see pages 3 and 7 of Appendix B and my responses to (b) and (d) above. There are no discrepancies.

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 black ink that reads "Antoinette Crowder". The signature is written in a cursive style with a large initial "A".

ANTOINETTE CROWDER

Dated: July 12, 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 12, 2000