

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF POSTAL SERVICE WITNESS STEVENS  
TO INTERROGATORIES OF ADVO (ADVO/USPS-T15-1 - 8)  
(May 26, 2005)

The United States Postal Service hereby provides the response of witness Stevens to the following interrogatories of ADVO, filed on May 12, 2005: ADVO/USPS-T15-1 - 8.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 26, 2005

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**ADVO/USPS-T15-1.** Please refer to LR-K-79, MDCD.SCAN6. Explain the distinctions, if any, in the following and how they were used to track individual sampled times to the specific cost pools in COSTPOOL2.FINAL and MDCD.CPSUM.FINAL.

- (a) Between TRAVEL and TOFROM.
- (b) Between off-clock and off-street.
- (c) Between DELIVERY DDTRAVEL and DDTRAVEL DELIVERY.
- (d) Between DELIVERY NETWORK and NETWORK DELIVERY

ADVO/USPS-T15-1 response:

- a. Please see USPS-LR-K-133. The elapsed time between two scans is allocated to TRAVEL if the first scan is Clock to Street and the second scan is a start activity scan or start section scan, or conversely, the first scan is an end activity scan or end section scan and the next scan is Clock to Office. In these cases, the carrier has failed to scan either the Leave Office or Arrive Office scan, so the transition from PREP to TO/FROM or from TO/FROM to PREP is not clear. CPFinal.sas, which produces MDCD.CPSUM.FINAL, reallocates TRAVEL time to PREP and TO/FROM based on the proportion of time in each pool. COSTPOOL2.xls does not have this reallocation. Please note that this time is minimal.
- b. Off-clock is time due to lunch and emergency. Off-street is time due to breaks and other administrative time. The main distinction is whether the carrier is off the clock (and therefore not getting paid) during this time, or

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whether the carrier is still on the clock during the time but not engaged in  
delivery tasks.

c. – d. Please see USPS-LR-K-133.

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**ADVO/USPS-T15-2.** Referring again to MDCD.SCAN6, please explain why the following four scans are considered Prep and how one can determine that the carrier was clocked onto Street prior to the “administrative” interruption:

63 – 18 Clock off Lunch – Clock to Street  
100 – 18 Clock off Break – Clock to Street  
117 – 18 Clock off Emergency – Clock to Street  
124 - 18 Clock off Other – Clock to Street.

ADVO/USPS-T15-2 response:

Please refer to USPS-LR-K-133. The time between these two scan pairs is considered PREP because the carrier has not yet scanned Clock to Street, indicating that the carrier is still in the office. Any office time is included in PREP.

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**ADVO/USPS-T15-3.** Referring again to MDCD.SCAN6, please explain the following scan times, whether there were actually some scans of this nature, and, if they were used, how they were used to track individual sampled times to specific cost pools in COSTPOOL2.FINAL and MDCD.CPSUM.FINAL.

25 – 56 Leave Office – Arrive Office (NA)  
49 – 18 Clock Off Street – Clock to Street (NONSTRT)  
63 – 32 Clock off Lunch – Clock to Lunch (SPLIT)  
100 – 70 Clock off Break – Clock to Break (SPLIT)  
117 – 87 Clock off Emergency – Clock to Emergency (SPLIT)  
124 – 94 Clock off Other – Clock to Other (SPLIT)

ADVO/USPS-T15-3 response:

Please refer to USPS-LR-K-133. The carrier is allowed to scan administrative activities (i.e. lunch, break, emergency, other) at any time. The time between any *End Admin – Start Admin* scan is assigned to delivery time if the carrier has previously scanned Start section, indicating that the carrier is delivering in a route section. If the carrier is on the street but not in a route section then the time in between administrative scans is assigned to Network travel time. However, if the carrier is on the street but has not yet arrived at the first activity or route section, then the time is assigned to travel TOFROM route. If the carrier is in the office then the time is assigned to PREP.

The carrier was instructed to clock off street and then clock to street if she/he is pivoting to another route. The time is assigned to Non-Street.

When a carrier scans Leave Office and Arrive Office it is not possible to tell what the carrier did on the street. Therefore this time is assigned to the 'NA' error pool.

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The table below shows the numbers of each scan pair, out of a total of 1,276,063 scan pairs used in the analysis.

Scan Pair	Frequency
25-56 Leave Office - Arrive Office	271
49-18 Clock Off Street - Clock to Street	528
63-32 Clock Off Lunch - Clock to Lunch	70
100-70 Clock Off Break - Clock to Break	359
117-87 Clock Off Emergency - Clock to Emergency	11
124-94 Clock Off Other - Clock to Other	404

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**ADVO/USPS-T15-4.** Referring again to MDCD.SCAN6, please use some examples to explain how the cost pool assignments were made for:

- Splits
- Delivery Section NA
- Delivery Network and Network Delivery
- DDTravel Delivery

ADVO/USPS-T15-4 response:

Please refer to USPS-LR-K-133.

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**ADVO/USPS-T15-5.** On page 3 of your testimony, you state that 9.7% of the scanned time came from “invalid or error scans.”

- (a) How much time (in hours and minutes) and how many scans does this figure represent?
- (b) What was the proportion of scan pairs that was deemed invalid or erroneous?
- (c) Please identify the top ten types of invalid scans along with the number of times they occurred and the amount of time they represent.
- (d) Has the USPS determined how to avoid so many invalid or error scans for future data collections? If so, please explain.
- (e) Does the USPS have plans to conduct a new CCSTS in the future?

ADVO/USPS-T15-5 response:

- a. 9.7% is calculated as the ratio of the total weighted invalid scan time over the sum of this invalid scan time and the total weighted valid scan time. The total weighted invalid scan time, expressed in hours and minutes, equals 922,640 hours and 25 minutes. The equivalent, unweighted invalid scan time equals 19,873 hours and 47 minutes.
- b. The proportion of scan pairs deemed invalid equals 6.9% of the grand total count of recorded scan pairs.
- c. Please see the following table that lists the top ten invalid scan pairs.

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1st Barcode	1st Barcode Name	2nd Barcode	2nd Barcode Name	Frequency	WEIGHTED ELAPSED TIME (Seconds)	CUMULATIVE WEIGHTED ELAPSED TIME (Seconds)	PERCENT OF TOTAL "INVALID-SEQUENCE" WEIGHTED ELAPSED TIME	CUMULATIVE PERCENT OF TOTAL "INVALID-SEQUENCE" WEIGHTED ELAPSED TIME
353	START PARCEL DELIVERY	353	START PARCEL DELIVERY	4,083	182,906,876	182,906,876	5.51%	5.51%
179	FINISH LOOP/FOOT SECTION	179	FINISH LOOP/FOOT SECTION	2,783	137,355,499	320,262,375	4.14%	9.64%
148	BEGIN LOOP/FOOT SECTION	148	BEGIN LOOP/FOOT SECTION	1,797	73,343,637	393,606,012	2.21%	11.85%
377	END PARCEL DELIVERY	186	FINISH MOUNTED - CURBLINE SECTION	1,002	52,244,933	445,850,945	1.57%	13.42%
49	CLOCK OFF STREET	56	ARRIVE OFFICE	2,275	49,506,707	495,357,652	1.49%	14.91%
353	START PARCEL DELIVERY	360	START ACCOUNTABLE DELIVERY	2,583	49,485,485	544,843,137	1.49%	16.40%
25	LEAVE OFFICE	56	ARRIVE OFFICE	271	48,206,322	593,049,459	1.45%	17.85%
25	LEAVE OFFICE	18	CLOCK TO STREET	2,261	45,138,006	638,187,465	1.36%	19.21%
148	BEGIN LOOP/FOOT SECTION	209	BEGIN CENTRAL/APARTMENT SECTION	895	44,973,389	683,160,854	1.35%	20.57%
148	BEGIN LOOP/FOOT SECTION	261	BEGIN MOUNTED - DISMOUNT SECTION	514	42,067,470	725,228,324	1.27%	21.83%

d. The USPS has concluded that the invalid scan rate is *de minimus* given the huge volume of data collected, the number of potential scans, and the factors that contribute to the incidence of invalid scans. Invalid scans are a composite of many different types of error, including but not limited to: the obvious operator error where the carrier chooses the wrong scan pair; error from scanner malfunctions or glitches (where data are lost); error emanating from carrier attempts to scan the correct barcode but misses and scans an inappropriate barcode unknowingly; and carrier error where the carrier attempts to scan the correct barcode but inadvertently, but knowingly, scans a wrong barcode. Although there are procedures where a carrier can

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override a wrong barcode and enter manually the correct code, we did not allow this procedure for the study because of the problem of misassigning the additional time to the wrong time pool. The carrier was to immediately scan the correct barcode and continue with the survey. In all of these examples, the invalid sequence would be isolated and only affect that portion of time for the carrier with the rest of the carrier's scans for the day unaffected and valid for the study.

- e. The decision to conduct a new study and its long-term implications are predicated on the PRC's response to the 2002 study.

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**ADVO/USPS-T15-6.** Please refer to MDCDCWEIGHTS.MASKZIPS.DATA in LR-K-78. In combination with page 2 of the text of LR-K-79, it appears that, for the 167 sampled zips, there are:

- 28 zip codes with less than eleven city letter routes
  - 131 zip codes with more than ten but less than sixty-one (city) letter routes
  - 8 zip codes with more than sixty (city) letter routes.
- (a) Please confirm that these are the correct figures for the data used to develop MDCD.CPSUM.FINAL.XLS. If this is not correct, please provide the correct information.
- (b) Were all routes and route-day data collected used to develop the MDCD.CPSUM.FINAL.XLS result (other than “invalid or error” scan times)? If not, please explain why.
- (c) Please provide the crosswalk between the MASKZIP code identifiers found in LR-K-79 and the unique zip identifiers used by witness Bradley in LR-K-81.

ADVO/USPS-T15-6 response:

- (a) Confirmed.
- (b) All route-day data collected were used to compute the street-time percentages in rows 61 – 74 of MDCD.CPSUM.FINAL.XLS, with the exception of route-day data from records that reported no delivery mode for the route.
- (c) Please see OCA/USPS-T15-4.

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**ADVO/USPS-T15-7.** If not already provided, please provide any other final CCSTS instruction manuals or guides or other hard-copy materials that were used by trainers, postmasters/supervisors, and/or carriers to determine how to collect the scan or volume data.

ADVO/USPS-T15-7 response:

All written instruction material have already been provided.

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**ADVO/USPS-T15-8.** For all final data files given to witness Bradley, please confirm the following or if not able to confirm, please explain:

- (a) All time and volume data for all city letter routes (including city phantom routes) in each zip were included for each sampled day.
- (b) Zip volume data for each day included only volume carried out to the street by city carriers that day and included volume in bulk/direct deliveries.
- (c) Only the time and volume data for sampled city letter routes were included.

ADVO/USPS-T15-8 response:

- a. Not Confirmed. The goal of the study was to include all city letter routes in each ZIP code for each sampled day. In practice, the goal of including all the routes for all the sampled days was not reached. The reasons are many and not limited to: regular carriers on leave (annual or sick) replaced by carriers who had not been trained for the study; a route inspection; scanner malfunction; etc.
- b. Not confirmed. ZIP volume data for each day was limited to the volume delivered that day, but that data *did not include* any bulk mail delivery volume.
- c. Confirmed.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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