

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 THE OCA (OCA/USPS-T15-17-20)
(July 1, 2005)

The United States Postal Service hereby provides the response of witness Stevens to the following interrogatories of the OCA, filed on June 17, 2005: OCA/USPS-T15-17-20.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, Fax -5402
July 1, 2005

**RESPONSE OF POSTAL SERVICE WITNESS DENNIS STEVENS
TO INTERROGATORY OF THE OCA**

OCA/USPS-T15-17. Please refer to your response to OCA/USPS-T15-8(f). You indicated that RTEZIP was denoted "ZIP for route" and SCANZIP was denoted "Scanned ZIP." Please explain exactly what the terms mean. That is, what is the difference between the two terms and what are their definitions? Assuming that a route covers part of one ZIP Code, are they always equal?

Response:

RTEZIP was labeled "ZIP for route" and represents the actual ZIP Code that was surveyed in the study. While "SCANZIP" represents the ZIP Code that was stored in the scanner. The ZIP stored in the scanner could be the ZIP Code where the mail is being delivered or the post office management ZIP, which is usually the ZIP code assigned to the broader finance number. Also, if a delivery unit has more than one ZIP Code carrier unit collocated at the site, only one ZIP is stored as the default in the scanner. That ZIP may or may not be the ZIP that was surveyed. For the purposes of the study, only RTEZIP is relevant.

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OCA/USPS-T15-18. Please refer to your answer to ADVO/USPS-T15-8(a). Did you examine whether on any specific day any city routes normally sampled were not included in the routes sampled for the specific day due to higher than normal delivery volumes.

- a. If your answer is affirmative, please discuss in detail.
- b. If your answer is negative, please explain why this analysis was not performed and provide information on the volume for the specific days for routes omitted from the sample.

Response:

No. First, I am not sure what you mean by “normal” delivery volumes. Mail volumes fluctuate within day (for example, Mondays vary) and across days (Monday through Saturday). Despite this fact, most carriers work fixed schedules. Mail volume fluctuation is in that sense “normal” and the post offices manage it by scheduling their carriers accordingly. On most days, it is anticipated that some number of carriers may have workloads that cannot be delivered in the carriers’ workday, and some number of carriers may have workloads that do not consume the entirety of the carriers’ workday. In those instances postal managers shift mail to create full workdays. Our focus was the ZIP not the carrier’s workday. In the scenario described, the actual work hours for the ZIP may not change despite the shifting of workload between carriers.

- a. N/A.
- b. The analysis that was performed was at the ZIP level. The data collection was done by route, not carrier, and an attempt was made to do every route every day consistent with my response to ADVO/USPS-T15-8. Consequently, high volume days as well as low volume days were included in the survey. That variation is tracked in the study and can be discerned from the volume data. However, I did not try to classify a

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work load level as being "normal". Nor, did I try to impute data where no data were recorded.

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OCA/USPS-T15-19. Please refer to your answer to ADVO/USPS-T15-6(b). Please indicate why no delivery mode has been assigned to the referenced routes.

Response:

No delivery mode was assigned when we could not ascertain a delivery mode for the referenced route from the CCS frame. In most instances, this was because the referenced route was not listed on the frame at all. In some cases, the referenced route was on the frame, but no delivery mode information was included.

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OCA/USPS-T15-20. Please refer to your response to ADVO/USPS-T15-5(d). Please provide any data, studies, memoranda, or position papers not already provided that substantiate your statement, "The USPS has concluded that the invalid scan rate is de minimis" Please also provide citations to the statistical, sampling, economic, survey, and/or other professional literature as appropriate and available.

Response:

The current PRC methodology relies on the testimony of Witness Hume, USPS-7 in R-87. In his Exhibit, USPS-7B, on page 14, he provides his distribution of STST components. He listed total tallies at 7,103 with "Missed" tallies of 551 or 7.75 percent of the total. Note, in my understanding of the 1986 study, a typical carrier was beeped 3 times and recorded his or her activity on a card. The data from the card was communicated to a technician during a debriefing at the end of the day. Further, my understanding of "missed" tallies is that they were tallies resulting from instances where the carrier did not receive the beep or did not note his or her activity when the beep occurred, or could not when prompted during the debriefing remember the activity that he or she was engaged in at the time of the beep. The 7.75 percent number is after a debriefing, where attempts were made to recover information so that the "missing" tallies could be converted to valid activities. The appropriate comparison with the 7.75 percent from our CCSTS, as stated in ADVO/USPS T-15-5c, is 6.9 percent, which is the proportion of scan pairs deemed invalid of the grand total count of recorded scan pairs rather than the 9.7 percent, which 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. Our number of 6.9 percent compares favorably with the status quo, especially considering the larger number of scans, no debriefing to fix or change recorded invalid sequences, and no corrections of known errors. Remember that, in the CCSTS, no

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provision was given the carriers to correct known scanning errors. whether intentional or accidental, after the fact, Intentional errors are ones that the carriers scanned and then realized that another barcode should have been scanned. Accidental would be instances where the carriers accidentally scanned a wrong barcode while attempting to scan the correct barcode. The carriers were told to ignore the erroneous scan and to continue with the correct scan. All of these factors led me to my characterization of the invalid scan rate as *de minimis*.

As to the second part of your question, because of the size and complexity of the study, I do not feel that any one cite will be appropriate to answer all of the issues involved.

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.

Eric P. Koetting

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