

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN
TO INTERROGATORY OF DAVID B. POPKIN
(DBP/USPS-T3-8)
(February 4, 2005)

The United States Postal Service hereby provides the response of witness Abdirahman to the following interrogatory of David B. Popkin: DBP/USPS-T3-8, filed on January 25, 2005.

The 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

/s/ _____
David H. Rubin

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RESPONSE OF POSTAL SERVICE WITNESS ABDIRAHMAN
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T3-8 Please refer to your response to Interrogatory OCA/USPS-T3-18. [a] Please explain why you measured the time to the nearest one-hundredth of a second. [b] Did it seem odd to you that ten separate measurements had values that were all within 1.015 seconds of 119.135 seconds? [c] If not, why not? [d] Please advise the arrangements that were made with the individual offices to observe these measurements including how you were able to conduct measurements at two separate offices on the same day since one might believe that repacking would be done at a similar time of the day. [e] Were the six individuals who were doing the repacking aware that they were being observed? [f] If so, please explain if that is the normal procedure and why you feel the data is reliable. [g] If not, what is the title of any other person in each facility who was aware that the observations were being made? [h] What is the approximate travel time between the two Minnesota offices, the two Connecticut offices, and the two Virginia offices?

RESPONSE:

- (a) I used a stop watch and recorded the information as such.
- (b) No.
- (c) The measured tasks were all similar. The similarity of times recorded suggested that the tasks were relatively standardized in terms of their required motions.
- (d) As a normal procedure, arrangements were made with individual Postmasters/Managers prior to the requested day of the observations to ensure that I would be able to observe the repackaging. Contrary to the assumption in your question, there was a wide window of time during which the repackaging activities could take place.
- (e) Yes.
- (f) I believe the data are good and reliable for this experiment. I observed no particular activity that would suggest the observed individuals had adjusted their activities due to my presence, nor did I engage them in conversation or do anything to distract them.
- (g) Not applicable.

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- (h) The approximate travel time between the two Minnesota offices is 1 hour 15 minutes. The approximate travel time between the two Connecticut offices is 12 minutes. The approximate travel time between the two Virginia offices is 7 minutes.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

/s/ _____
David H. Rubin

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