

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH BANK OF AMERICA CORPORATION

Docket No. MC2007-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RANEY TO
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
REDIRECTED FROM WITNESS AYUB
(APWU/USPS-T1-1)
(May 22, 2007)**

The United States Postal Service hereby provides the response of USPS witness Brent A. Raney to the following interrogatory of the American Postal Workers Union, AFL-CIO: APWU/USPS-T1-1, filed on March 27, 2007, and redirected from witness Ayub. The interrogatory is stated verbatim and is followed by the response. As indicated in the Notice of the United States Postal Service Regarding Substitution of Witness for Response to Interrogatory APWU/USPS-T1-1, filed concurrently with this response, witness Raney will substitute for USPS witness Ayub (USPS-T1-1) for the purpose of responding to this interrogatory. This response incorporates witness Ayub's prior response to this interrogatory and includes new content which is highlighted in gray. Accordingly, this response should be substituted for the partial response filed by witness Ayub on May 1, 2007.

UNITED STATES POSTAL SERVICE

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APWU/USPS-T1-1. Please review the following quotes taken from recent Comprehensive Statements of the Postal Service:

“The ICS system is being added to all of our existing bar code sorters... When deployment is complete in early 2001, over 9,000 barcode sorters will be retrofitted with an ICS upgrade kit. The upgrade is increasing bar code sorter efficiency.” [CS 2000, page 46.]

“During 2003, 90 delivery barcode sorter-expanded capability machines were deployed, bringing the total number of DBCS-ECs to 94. The DBCS-EC machines can process a portion of letter mail that would otherwise require manual distribution. This equipment can handle a wider range of mail than previous barcode sorters,...” [CS 2003, page 60.]

“Deployment of Wide Field of View (WFOV) cameras as replacements for the aging and obsolete wide area barcode readers (WABCR) started in 2003. ... The WFOV camera system demonstrated a significant improvement over the WABCR in reading POSTNET and PLANET barcodes. Deployment of over 9,000 WFOV cameras was completed in November 2003.” [CS 2003, page 61.]

“Letter mail automation capabilities were expanded significantly in 2006 with the addition of new barcode recognition and data collection functions to support marketing and Intelligent Mail efforts. Most of the letter mail processing equipment has been upgraded to support the tracking of inter-facility mail.” [CS 2006, page 36.]

- a) Please provide all studies, test results, or other documentation that measures or reports on any improvements in the efficiency of barcode sorters with these enhancements compared to barcode sorters prior to the installation of these enhancements.
- b) Please provide information on what percentage of the barcode sorters in the Postal Service have these enhancements now, what percentage can expect to have these enhancements within the next three years and what percentage had these enhancements in 1999.

RESPONSE:

- a) The Postal Service filed a partial response to this interrogatory on May 1, 2007. On May 4, 2007, the following responsive documents were submitted as library reference USPS-LR-3/MC2007-1 under the protective conditions set forth in the Presiding Officer’s Ruling No. MC2007-1/4:

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- (1) Decision Analysis Report, Wide Area Bar Code Reader Replacement, Engineering, Restricted Information, June 28, 2001 (“DAR 1”);
- (2) Memorandum from Donna M. Peak to Nicholas F. Barranca and Thomas G. Day, Wide Area Bar Code Reader Replacement Decision Analysis Report, July 20, 2001;
- (3) Decision Analysis Report, Modification Request for Delivery Bar Code Sorter Expanded Capability Modification, Engineering, Restricted Information, July 11, 2002 (“DAR 2”);
- (4) Memorandum from Donna M. Peak to Mr. Day and Mr. Vogel, Delivery Barcode Sorter Expanded Capability Modification Decision Analysis Report Modification Request, August 9, 2002;
- (5) Decision Analysis Report, Identification Code Sort & Pilot Development of Commitment Management – Integrated Operations Management, Engineering, Restricted Information, May 28, 1998 (“DAR 3”);
- (6) Memorandum from M. Richard Porras to Mr. Dowling, Identification Code Sort (ICS) and Pilot Development of Commitment Management-Integrated Operations Management (CM-IOM) Decision Analysis Report (DAR), July 6, 1998.

I believe that it is important to emphasize the limited relevance of this information to the current proposal for the BAC NSA:

- Identification Code Sort (ICS): Data on the Identification Code Sort program are contained in a Decision Analysis Report (DAR) dating to May of 1998. ICS deployment is not, however, pertinent to the proposal at

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issue in this proceeding because the deployment of ICS only leads to improvements in the read rate of “anonymous” mail (i.e., mail received over the counter or in collection boxes, not presort mail such as that presented by BAC). ICS improvements are obtained from the ability to use the Postal Service derived address information (obtained by running the mail through an OCR) when a Postal applied Postnet applied by the postal service is unreadable for any reason. Since the Bank of America mail at issue in this proceeding bypasses the OCR operation, it does not benefit from this enhancement.

- Expanded Capability (EC): Data are provided for the Expanded Capability program from a Decision Analysis Report dating to May of 2000.

However, EC is not pertinent to this proceeding because the performance enhancements included in the DAR are related to the physical characteristics of the mail pieces, not the barcode. That is, there are no read rate improvements due to the implementation of the EC program. All of the improvements were productivity improvements gained by moving a percentage of manual mail up to automation operations.

- Wide Field of View (WFOV) Camera: Data are provided for the Wide Field of View Camera program from a Decision Analysis Report dating to June 2001. The WFOV was justified on enhancing the read rates of pre-barcoded mail. On average, in tests, First-Class Mail that was pre-barcoded read 0.45 percent better than the previous Wide Area Barcode Reader. However, if Bank of America was preparing its mail to meet

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automation compatibility requirements, then the read rate improvement from the WFOV would presumably be less than the average improvements measured.

Since the Postal Service filed its original partial response, I have become aware of the following document: "Wide Field of View Camera Competitive Field Test Plan," dated March 16, 2001 ("Test Plan"). I have included this document as an attachment to this response.

The Test Plan contains information on the Postal Service's 2001 competitive test of Wide Field of View (WFOV) cameras supplied by vendors. This test, and the results of the test, are referenced in Decision Analysis Report, Wide Area Bar Code Reader Replacement, Engineering, Restricted Information, June 28, 2001 ("DAR 1"), Memorandum from Donna M. Peak to Nicholas F. Barranca and Thomas G. Day, Wide Area Bar Code Reader Replacement Decision Analysis Report, July 20, 2001, and in the third bullet point above. The Test Plan includes guidelines on test procedure and protocol, equipment maintenance, data collection, and other information on the parameters of the competitive test.

In my view, this document provides further evidence that the test results contained in DAR 1, which suggests a relationship between use of the WFOV camera and increases in accept rates for First-Class Mail and Standard Mail, should not be presumed to reflect the current accept rates for Bank of America Mail.

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First, unlike the systemwide average data on read/accept rates that support the baseline values in this NSA, the accept rate data collected during the competitive test were not intended to be used as a basis for setting rates or price discounts for First-Class Mail and Standard Mail. I understand that the purpose of the competitive test was, in part, to determine which “vendor’s camera system [resulted] in the highest POSTNET read rate with no increase in errors.” Test Plan, at 3. Another stated purpose of the test was “to measure read and error performance of the IBI [(“Information Based Indicia”)] and PLANET [barcodes]”, not the Intelligent Mail Barcodes (IMBs) that BAC is required to apply to its mailpieces under this NSA. See Test Plan, at 3. Because the purpose for which the systemwide average data was collected differs from the purposes of the competitive test, I believe that those results should not inform the rate proposal before the Commission.

Second, it is my understanding that the competitive test was conducted under controlled conditions that do not necessarily reflect the real world conditions under which BAC’s mail processing performance will be measured and evaluated. According to the Test Plan, testing of the WFOV cameras was conducted during specific time periods and monitored by the “USPS test team” and contractor personnel. See Test Plan, at 10. Vendors were allowed to conduct routine preventative maintenance and corrective maintenance on equipment during the test and were “encouraged to have ample spare parts to support their [WFOV] systems throughout the entire [test period].” See Test Plan, at 2, 8. The Test Plan also provided vendors with a procedure for obtaining

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written permission to make hardware, software, and cabling improvements to the WFOV camera systems during the test. In sum, it is my understanding that the conditions under which the accept rate data from the competitive test were collected likely differ from the conditions under which BAC would prepare and submit its mail without this NSA.

Third, I understand that while the Test Plan indicates that data were collected from “approximately 30,000 live barcoded letter mail,” the accept rates reported in DAR 1 were based on data collected from 3,000 of the 30,000 mailpieces that were tested each day during ten weeks of testing.¹ See Test Plan at 4. Additionally, the “total test period” was thirteen weeks long and included two one-week pretests, during which the USPS test team and vendors could become familiar with the testing procedures, and a week of “fine-tuning” before the formal test period commenced. See Test Plan, at 4, 6. Therefore, it is my view that these results may not necessarily serve as indicators of BAC mail processing performance over longer periods of time.

(b) I understand that:

- 100 percent of postal barcode sorters have Identification Code Source (ICS) installed. The Postal Service began deployment of ICS in 1999. Deployment was completed in 2000.

¹ It is my understanding that the mailpieces from which the data were collected all contained mailer-applied POSTNET barcodes.

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- 100 percent of postal barcode sorters have the Wide Field of View (WFOV) camera installed. The Postal Service began deployment of WFOV in 2002. Deployment was completed in 2004.
- Approximately 9 percent of postal barcode sorters currently have the Expanded Capability (EC) function. No barcode sorters had the Expanded Capability (EC) function in 1999.

It is my understanding that the Postal Service has no plans to implement or deploy any additional enhancements described in the interrogatory.



**WIDE FIELD OF VIEW CAMERA
COMPETITIVE FIELD TEST PLAN**

March 16, 2001

1. General

1.1 Introduction

The U. S. Postal Service intends to procure approximately 11,300 Wide Field of View (WFOV) camera systems to replace the current Wide Area Bar Code Reader (WABCR) cameras in use across all bar code sorting equipment except for MPBCSs. These WFOV systems will read existing barcodes, PLANET codes, Information Based Indicia Postage (IBIP), and other two dimensional codes. IBI technology will give postal customers more flexibility in addressing and managing their mailing requirements by taking advantage of such technology on the Internet, the personal computer, and 2-D barcoding applications. It will also give our business customers the ability to code certain information in the postage code for better office efficiencies.

This document describes the scope, approach, resources, schedule, activities, and features to be tested during the WFOV competitive test. Multiple vendors will be tested concurrently to measure the performance of each WFOV camera system.

1.2 OVERVIEW

The competitive test will be conducted at two sites. Vendors are required to bring five (5) cameras to Tampa from which the USPS shall choose up to three to be tested. The remaining two cameras shall be used for testing in San Diego, CA. Vendors are encouraged to have ample spare parts to support their systems throughout the entire testing. No allowance will be made for vendors that can not fully support their systems throughout the testing at both sites.

Vendor's camera systems will be mounted on modified barcode sorter transports. At each site, two barcode sorter transports will be modified to accept three cameras (read heads) each. A standard base-lined WABCR read head will be installed on each of the barcode sorter transports as well as camera systems from two vendors.

Recognition performance for reading POSTNET barcodes both in the address block and in the lower right corner of the mailpiece will be measured against the standard base-lined WABCRs for the camera systems. Live mail and prepared test decks will be used for these performance measurements.

Test decks and live mail, if available will be used to measure IBI and PLANET code read performance.

1.3 Test Objective

The first objective of the WFOV Camera System test is to determine which vendor's camera system results in the highest POSTNET read rate with no increase in errors. Errors are defined in the WFOV cost model and shall be given to all vendors in a separate document.

The second objective of the test is to measure read and error performance of the IBI and PLANET codes.

The third objective is to test all requirements in the Statement of Work (SOW), diagnostics, and functionality of the WFOV system.

1.4 Scope of Test

The WFOV Competitive Test will be conducted at two sites and will test all features of the vendor's camera system. The test will measure performance, functionality, maintainability, and reliability.

The test shall provide sufficient data to evaluate the performance of the competing vendor's Wide Field of View Camera systems to determine performance relative to the USPS Cost Model and to the technical specifications listed in the WFOV SOW.

1.5 Test Sites

The WFOV Competitive Test sites selected are both USPS Processing and Distribution Centers (P&DC's). The vendors will install the WFOV camera systems in accordance with the WFOV Program Office and the facilities needs. The sites selected for the WFOV Competitive Test are:

1. Tampa Processing and Distribution Center
5201 West Spruce St
Tampa FL 33630-9997
2. M L Sellers Processing and Distribution Center
11251 Rancho Carmel Drive
San Diego CA 92199-9997

2 Schedule

2.1 Overall Schedule

The test will be seven-weeks in duration at the first site and six-weeks at the second site. Prior to the one-week pretest at the first site there will be a one-week Form, Fit, and Functional Test, that will be conducted only at the first site. During this week the vendors will demonstrate that their system will indeed fit in

the existing space on the barcode sorter (unless a written waiver has been approved from the USPS Contractor Officer). Also, each vendor will demonstrate their diagnostic and functional capabilities along with their compliance to all requirements in the SOW.

There will be a one-week pretest prior to the start of the five-week formal testing. The purpose of the pretest is for the USPS Test Team and vendors to become familiar with the testing procedures. When all parties involved become familiar with the testing procedures and responsibilities, the five-week Formal Test will begin. At the test director's discretion pretest may be shortened or lengthened. No testing will be conducted on USPS designated legal holidays or weekends.

The total test period is seven week at the first site, which is Tampa and six-weeks at the San Diego site.

2.2 Test Schedule

During the week of March 19th the Form, Fit, and Functional Test will run concurrently with installation. March 26th pretest will commence and end on March 30th. There will be a week of fine-tuning beginning on April 2nd. Postal representatives will be available for assistance. Vendors will be given specific times during this week, similar to how the time was divided during the pre-pretest. The test director shall inform the vendors of the schedule during the pretest week. Formal testing will be conducted from April 9th through May 11th.

The test will resume at the San Diego facility on May 8, 2001. Installation will be from May 8th through May 9th. Pretest will be from May 10th through May 11th. Formal testing will be conducted from May 14th through June 15th. San Diego's schedule may slip one week. Decision will be made at a later date.

The normal test day will commence between 8am and 9am, and conclude between 5pm and 6pm. Testing is conducted five days a week. Monday through Friday, excluding holidays observed by the USPS. The USPS will continue to collect data during the "non-testing times" from 5pm – 8am on Mondays, Tuesdays, Wednesdays, Thursdays, and Fridays. This data will be used in the final vendor evaluations.

2.3 Installation

The vendors will begin installation at the Tampa facility on March 19, 2001, and May 8, 2001 at the San Diego facility. The vendors are required to bring five cameras to the first day of installation at the Tampa site. USPS will randomly select the cameras for testing. At the beginning of the test, one camera will be used on the barcode sorter transport and another used in the Form, Fit, and Functional Test. All five cameras will ultimately be used during the thirteen-week testing period. The postal service shall decide the use of the cameras. Vendors

will not be allowed to switch cameras until instructed and authorized to do so by the USPS Test Director.

3. Test Descriptions

3.1 General

There will be volume runs using live barcoded mail and test runs using both live mail and test decks. Mail volume for the test comes from the facility's barcoded mail base of letter mail. Test decks will be comprised of the following:

POSTNET Reader/Verifier STRESS deck is comprised of pieces that are printed from films and emulate POSTNET that is printed out of specification.

IBI, PDF 417 and DataMatrix both preprinted using inkjet and laser printing. Both are printed out of specification to emulate what is actually being printed on live mail. Both will be printed on various colored envelopes.

POSTNET printed by USPS MLOCR on various colored envelopes.

IBI (PDF 417) printed by two approved IBI providers. Pieces will be printed on various colored and recycled envelopes.

PLANET codes.

3.2 Form, Fit, and Functional (FFF) Test

The Form, Fit, and Functional Test (also called Interface and Integration) is NOT an official part of the CFT, but is an integral part of the proposal evaluation process and will be conducted in Tampa prior to pretesting, to better utilize both postal and vendor resources to the maximum extent possible. The FFF shall commence on 3/20 with the first vendor chosen in the lottery drawing conducting in Tampa during the pre-pretest. The second vendor shall begin on 3/21, the third on 3/22, and the last on 3/23.

Vendors shall demonstrate their camera systems salient features during the FFF. Beginning on 3/20, Vendor A will begin the test on a third barcode sorter. During this test the vendors will demonstrate that their system (i.e. camera, processor, tachometer, etc.) will indeed fit in the existing space of the barcode sorter (unless the vendor has received a waiver). Also, each vendor will be tested on all requirements in the SOW. Vendors shall devise a checksheet or checklist highlighting relevant camera features. Vendors shall bring at least five copies of his checksheet listing their features and will be responsible for conducting the FFF. USPS observers shall make notes of the demonstration and later meet to compare notes. The consensus notes will become an official portion of the

vendors entire proposal evaluation. The vendor will furthermore demonstrate their diagnostic and functionality of their system. While in the sort position of the barcode sorter, both live mail and test decks will be processed. The vendor will have up to ten hours to complete this test. Each successive day after the vendor A, vendor B will repeat the process until all vendors have been tested. This test will only be conducted at the Tampa facility.

3.3 Pretest

The first week of competitive testing is scheduled for pretest. The purpose of pretest is for the USPS Test Team and the vendors to become familiar with the testing procedures. When the test team becomes familiar with the testing procedures and responsibilities, the five-week Formal Test will begin. At the Test Director's discretion, pretest may be shortened or extended. Pretest will be conducted as close as possible to the same conditions and procedures as the Formal Test.

The vendors shall be present during the pretest to resolve any questions the test team has regarding the WFOV camera system or report generation. No modifications to the camera systems are allowed during the pretest without written approval from the USPS Contracting Officer.

Data collected during this period will not be used in the final evaluation.

3.4 Formal Test

The Wide Field of View Camera systems will be formally tested for five weeks. All data recorded during this time period will be used in the final evaluation.

The formal test will commence with either a 3000 live prebarcoded letter mail test run or a WABCR test deck run. The "live" test deck run will be from the available prebarcoded mail at the test site. The same test decks will be processed on both test machines. This run will be evaluated for read and error performance. Data from the live test deck will be used to support the USPS Decision Analysis Report (DAR) and to measure one vendor's performance against all others.

Normally one test deck run from section 3.1 will be processed on a daily basis. The same test deck will be processed on both test machines. This run will also be evaluated for read and error performance. The Postal Service reserves the right to run any number of test decks in any given combination on any given days at the discretion of the test director. Data will be used to measure one vendor's performance against all others.

Each day a volume run of approximately 30,000 live barcoded letter mail will be processed. The same 30,000 pieces will be processed on both test machines. Postal Service shall collect data and use subjectively in determining the best

performing camera for the day. Cumulative data will assist in determining the best performing camera for the duration of the test. Cumulative data from Tampa and San Diego will be used to determine the best overall performing camera.

Jam shall be tracked and used as part of overall performance metrics. After the completion of the daily test schedule, USPS will continue to collect data from each vendor's camera system. This will be accomplished by using the USPS data collection PC as stated in section 4.1.

No modifications to the camera systems are allowed during the formal test without written approval from the USPS Contracting Officer.

3.5 Communication with USPS Data Collection

For the competitive test, because there are other differences in the firmware, the Postal Service plans to use ONLY the version (4.1) that generates the "Busy" signal. All vendors adequately demonstrated that they are able to operate correctly without it during the Tampa Pre-pretest.

3.6 Daily Test Schedule

Testing is normally conducted between eight to ten hours per day. Testing times, length of runs, and daily schedules may change depending on the availability of suitable barcoded letter mail and the required dispatch times of the test site. Vendors will be given a test schedule during the week of pretest. This schedule will also include the rotation of the cameras within and between the two-barcode sorters. All vendors will be in one of the three positions on the two modified barcode sorter transports for approximately four days. After the fourth day the vendor will rotate to another position on the same barcode sorter. Once the twelfth day is completed, vendors will move to the other test barcode sorter wherein the same rotation schedule will take place. Ultimate rotations shall be decided upon by the test director.

4. Data Collection and Analysis

4.1 POSTNET Configuration

At each barcode sorter an USPS provided PC will accept the output from the three WABCR processors which are reading the POSTNET barcodes. During the test deck runs, the samples will be fed in batches of one tray at a time. All of the samples will be output to one stacker in the order in which they were fed. The files will be accumulated and will be available for display to the test personnel. The program will flag and display the file(s) from each tray where there is disagreement between any of the readers. This sample piece will then be located for inspection. If any reader reads the sample piece correctly, it will

be considered correct. If there is an error, the vendor will be charged for an error. The cost model defines errors and gives weighted penalties based where in the mail stream the error occurs.

5. Maintenance

5.1 Preventive Maintenance

Beginning the first day of pretest, through the last day of formal testing, there will be no system improvements, (i.e. hardware, software, cabling etc.) made to any of the vendors' WFOV camera systems without written permission of the USPS Contracting Officer. The Test Director must obtain written approval from the USPS Contracting Officer prior to authorizing any changes.

The vendor will be allowed time each day/week/monthly for routine preventative maintenance (PM). A preventative maintenance schedule must be completed and submitted to the Test Director prior to the beginning of pretest. It must include activities and the times needed for daily, weekly, and monthly preventative maintenance.

The routine preventative maintenance shall follow the vendor's documented schedule. The vendor will sign and record all maintenance in an USPS provided Maintenance Log. USPS test personnel will verify all maintenance entries.

The total number of man-hours of preventive maintenance shall be timed and recorded along with all tasks performed. The skill level, number of personnel, and equipment used to perform preventive maintenance will also be recorded.

The vendor shall not perform preventive maintenance unless there is a USPS Test team member present. The USPS team member shall run the machine and feed any test mail/targets.

During the last week at each test site, the vendors shall open the camera and electronics enclosure to allow USPS maintenance representatives to inspect and document interior conditions. Results of this inspection shall be used in the overall technical evaluation of the camera.

5.2 Corrective Maintenance

Corrective maintenance is defined as any maintenance performed on a camera system that is outside of the scope of preventive maintenance. As with preventive maintenance the vendor will sign and record all maintenance in an USPS provided Maintenance Log. USPS test personnel will verify all maintenance entries.

The total number of man-hours of corrective maintenance shall be timed and recorded along with all tasks performed. The skill level, number of personnel, and equipment used to perform corrective maintenance will also be recorded.

The vendor shall not perform any corrective maintenance unless there is an USPS Test team member present.

If a corrective maintenance event exceeds 60 minutes of clock time, the event shall be recorded as a Hard Failure. Once a Hard Failure is recorded, the run time for that particular vendor's test run will be stopped. The vendor will be allowed an opportunity to perform corrective maintenance on their camera system at the completion of the entire day's run and shall be timed to document the amount of time and personnel needed to fix the system and recorded on the USPS Maintenance Log.

6. Test Results

At the completion of each day, all of the data sheets and computer reports will be checked for accuracy and completeness. The data will be sent to Equipment Requirements and Economic Analysis (EREA) within 48 hours. EREA is responsible for determining cost model results. Individual vendor results as well as the USPS WABCR results shall be given to the vendors within 48 hours.

7. Test Personnel and Responsibilities

7.1 Test Director

The Test Director has overall responsibility for conducting the tests at all test sites. This person is responsible for ensuring that all cameras are tested equally.

7.2 Test Assistants

The Test Assistants report to the Test Director. Responsibilities include timing all events, monitoring the processing of the test decks and volume runs, and compiling all data.

7.3 USPS Maintenance Representative

USPS maintenance representatives are assigned to the test during the hours of operation each day and during any other time the contractor is performing any type of maintenance on the equipment. They will witness all maintenance activities and insure that all maintenance activities are properly entered into the USPS Maintenance Log. They also assist in other activities as required. They are considered part of the test team and report to the Test Director.

7.4 Site Coordinator

One person from the local test site is assigned as the Site Coordinator. This person is responsible for obtaining USPS operations personnel, mail and sort schemes for the mail being processed, for interfacing with local mail processing supervision, for obtaining adequate space and other facility needs to accommodate the test, and for addressing any site related problems. During the test period, the Site Coordinator assists the Test Director in all matters involving the test site. The Site Coordinator must assure that all necessary mail, operating personnel and operations supervision is available at the prescribed and agreed upon time and place.

7.5 Supervisor, Distribution Operation (SDO)

The test site assigns a Supervisor of Distribution Operations (SDO) to the test. The SDO coordinates all mail processing activities for the test site, including USPS personnel needs and mail availability. This person schedules and rotates all personnel assigned to operate the barcode sorter (load, process, and sweep) as well as supervise USPS mail processing activities during the test period. The Supervisor, Distribution Operation (SDO) is a part of the USPS test team and assists the Test Director in ensuring that all critical dispatch times are met.

7.6 Site Provided Resources

The test site provides:

1. Three barcode sorters.
2. Suitable mail for processing.
3. Personnel to operate the barcode sorters.
4. Sort schemes.
5. Maintenance of the barcode sorter (except on vendor's WFOV cameras).
6. Parking space, tables, and chairs for test personnel.
7. Roped off area around the machines, if necessary.

7.7 Contractor Personnel

The contractor will designate a person to represent their company during the test. This person will be the sole interface with the Test Director during the pretest and formal test periods. The Contractor's Representative is the single point of contact with the USPS test Team. His/her activities are limited to observation only and he/she shall never touch the WFOV system. This individual or designated alternate must be at the post office during testing. No contractors are allowed within the test boundary except to perform maintenance. No contractors are allowed in the postal facility outside of the schedule testing hours.

7.8 Contractor Maintenance

The Contractor site personnel are allowed time each day/week/month for routine preventive maintenance and cleaning of the equipment. A preventive maintenance schedule must be completed and submitted to the Test Director prior to the beginning of pretest. It must include activities and the time needed for daily, weekly, and monthly preventive maintenance. All such maintenance must be entered in the USPS provided Maintenance Log.

Once pretest starts, no changes shall be made, to the maintenance schedule except with the prior written approval of the USPS Contracting Officer and USPS Program Manager.

The contractor shall provide all maintenance, parts, materials, tools and supplies necessary to support their system during installation, training and testing. The Test Director in conjunction with the contractor and local site appoints a time of day that the preventive maintenance is conducted.

Once the pretest begins the contractor shall not touch their system without the presence of the USPS maintenance test team member. During all maintenance activities, the number of contractor personnel around the machine are recorded along with the time to compute man-hours required for maintenance.

The contractor shall maintain a Maintenance Log, provided by the USPS, showing all preventive, corrective and modification maintenance activity, including dates, times, repairs, adjustments, and parts usage. This log shall cover the entire pretest and formal testing period.

8. Conduct and Security

8.1 General

All personnel involved with this test must comply with USPS and local office regulations regarding security, dress, and other standards of conduct while on Postal property.

All contractors and USPS test team personnel are issued test team identification badges that must be worn at all times in the post office along with either their company or Postal Service identification badge.

8.2 Housekeeping

To effectively operate, maintain, and test the WFOV camera system in the field, it is important that good housekeeping procedures be followed. The USPS Test Director is responsible for establishing and maintaining a high standard of housekeeping in the machine area. All test personnel and contractors must

abide by the rules of the local facility with reference to smoking, eating and drinking, wearing apparel, etc.

8.3 Safety and Health

Safety and health concerns for all test personnel, equipment operators and maintenance personnel are a primary interest of this test. At no time can an individual be placed in jeopardy due to the presence of a potential safety and/or health risk situation. Conditions or procedures that could lead to unsafe or unhealthy situations during the test are reported to the Test Director immediately. If the Test Director considers the situation to be sufficiently dangerous, he/she may terminate the test until appropriate action has been taken to correct the situation.

8.4 Security

Ropes and/or other barriers may mark off the area where the test system is installed. Only authorized personnel are allowed inside the marked boundaries. During tests, only personnel actually involved in the operation and testing of the equipment are allowed in the areas near the machine(s).

8.5 Staff and Visitors

All personnel participating in the tests are issued badges indicating whether they are postal or a contractor. Each contractor has a different color badge for their employees. These badges must be worn whenever the personnel are in the facility.

All visitors must be approved in advance by the Test Director and are required to wear a visitor's badge while on site. Visitors will be required to identify themselves on a sign-in sheet. While approved visitors will be allowed on the site, they will not be allowed in the test area or near the WFOV camera system, unless approved by the Test Director.

9. Miscellaneous

9.1 General

At the Test Director's discretion, due to the volatility of testing, either environment or equipment related, the above procedures may be altered to ensure a fair and factual test. Time permitted, prior notification to the vendors will be given.

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.

Matthew J. Connolly

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May 22, 2007