

1 **Q. Reference: At page 45 of the report, Liberty states that it “used the annual average**
2 **overtime hours for the 2011 through 2013 period as a basis of comparison against**
3 **2014 data”.**

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5 **Please provide Liberty’s rationale for use of the 2011 through 2013 period for its**
6 **comparison.**

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9 **A. The use of the average for the most recent three years prior to 2014 was intended to**
10 **normalize overtime hours in a manner that would mitigate the influence of any anomalies**
11 **that might result from using only 2013 as a basis for comparison, while continuing to use**
12 **reasonably current data.**