

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**FIRST SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS THRESS**

(POSTCOM/USPS-T7-1 - 18)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce ("PostCom") directs the attached First Set of Interrogatories to Witness Thomas E. Thress. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

In addition, with respect to the attached interrogatories, please apply the following definitions and instructions:

Data Format: All data is requested in ASCII encoded comma delimited format with accompanying file layout, or in Excel format. Data should be presented in its entirety, without any hidden rows, columns, or sheets and without any scroll locking or other feature that prevent viewing of any data.

Data Dictionary: A catalog of all data held in the file or files, including tables, field names, field lengths, definitions of data elements (including explanations of each coded value for coded fields), item types (e.g., numeric or character), and validation rules (e.g., value should always be non-negative).

Glossary of Variable Names: A catalog of all variables used in analysis (whether used in the final analysis, exploratory analysis, or both), including definitions of variable names, unit of measure, and, if appropriate, the formulas used to construct the variable. If variable definitions vary across regression models, please provide separate glossaries for each regression model, both exploratory and final.

Respectfully submitted,

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POSTCOM/USPS-T7-1. Have all data necessary to replicate all of the models outlined in the "LIBRARY REFERENCE USPS-LR-L-64: DEMAND ANALYSIS ECONOMETRIC MATERIALS" (herein referred to as "final model") been produced within the following library references: LR-L-63, LR-L-64, LR-L-65, LR-L-66 (herein referred to LR-L-63 -- 66) in the requested Data Format? If so, please describe its location within these files. If not, please provide all the data necessary to replicate the models in the requested Data Format.

POSTCOM/USPS-T7-2. Have all data necessary to replicate all of the models outlined in the "LIBRARY REFERENCE USPS-LR-L-65: DEMAND ANALYSIS ECONOMETRIC CHOICE TRAIL" (herein referred to as "exploratory analysis") been produced within LR-L-63 – 66 in the requested Data Format? If so, please describe its location within these files. If not, please provide all the data necessary to replicate the models in the requested Data Format.

POSTCOM/USPS-T7-3. Have all EViews programs and workfiles necessary to replicate all of the models outlined in the "LIBRARY REFERENCE USPS-LR-L-64: DEMAND ANALYSIS ECONOMETRIC MATERIALS" (final model) been produced within library reference LR-L-64? If not, please provide all the programs and workfiles necessary to replicate the models. Please include a Glossary of Variable Names for each program provided.

POSTCOM/USPS-T7-4. Have all EViews programs and workfiles necessary to replicate all of the models outlined in the "LIBRARY REFERENCE USPS-LR-L-65:

DEMAND ANALYSIS ECONOMETRIC CHOICE TRAIL" ("exploratory analysis") been produced within the LR-L-65 library reference? If not, please provide all the programs and workfiles necessary to replicate the models. Please include a Glossary of Variable Names for each program provided.

POSTCOM/USPS-T7-5. Do each of the programs referred to in questions POSTCOM/USPS-T7-3 -- 4 include all necessary variables definitions as a function of the data provided in LR-L-63 to reproduce final model results? If not, please produce the additional programs and workfiles necessary to fully replicate the models outlined above. Please include a Glossary of Variable Names for each program provided.

POSTCOM/USPS-T7-6: Are the contents of the files DEQN.PRG (the text of which starts on page 64-276) and demandequations.prg (a separate file in LR-L-64) equivalent? Refer to page 38 of DEQN.prg with the line that reads: "%ols_start = "1993:1". If these files are not equivalent, please describe the differences and confirm which code produces the final model results.

POSTCOM/USPS-T7-7. Have any calculated formula results in the Excel spreadsheets provided within library references LR-L-63 -- 66 been overwritten using the 'Paste Special... Values' feature in Excel, or been otherwise hidden or removed from view? If so, please produce versions of all Excel spreadsheets with all calculated formulas intact and operational.

POSTCOM/USPS-T7-8. Please produce quarterly volume data for Library/Media Mail in pieces by weight (in ounces or weight in pounds including decimals rounded to the tenth of a pound) in all available years after 1970. Please deliver this data in the requested Data Format with an accompanying Data Dictionary. If this data in the requested Data Format is already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-9. Please produce quarterly volume data for all variables underlying Tables 24 and 25 of USPS-T-7 in all available years after 1970, including but not limited to volume data for Standard Regular mail. Please deliver this data in the requested Data Format with an accompanying Data Dictionary. If this data in the requested Data Format is already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-10. Please produce details of the exploratory analysis of Standard Regular mail related to Tables 24 and 25 of USPS-T-7, including any variables included but not presented or examined, but excluded from the final analysis (e.g. prices of newspapers). Please provide all the programs and workfiles necessary to replicate the analysis. Please include a Glossary of Variable Names for the analysis provided. Please deliver all data in the requested Data Format with an accompanying Data Dictionary. If any or all programs, workfiles and data in the requested Data Format are already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-11. Please produce quarterly prices of Standard Parcels in all available years after 1970, determined using the same methodology as the price of Standard Regular mail that underlies the results presented in Table 24 of USPS-T-7. Please deliver the data in the requested Data Format with an accompanying Data Dictionary (as defined above). If this data in the requested Data Format is already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-12. Please produce quarterly volume data for Standard Parcels in pieces in all available years after 1970. If this data is not available, please provide an estimated quarterly percentage of mail shapes, including parcels, in each Standard Mail subclass. Please deliver the data in the requested Data Format with an accompanying Data Dictionary. If data in the requested Data Format is already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-13. Please produce quarterly price and volume data of other parcel carriers, including but not limited to FedEx, UPS, DHL, etc. for all years after 1970 for which it is available (separately for all delivery methods including but not limited to ground delivery). Please deliver the data in the requested Data Format with an accompanying Data Dictionary. If this data is already available in the requested Data Format in library references LR-L-63 -- 66, please describe its location within the files. Please include a detailed description and examples of the methodology used to adjust the UPS, FedEx, and DHL numbers for ground package delivery to the Postal fiscal year.

POSTCOM/USPS-T7-14. Please produce details of the exploratory analysis for other parcel carriers, including but not limited to FedEx, UPS, DHL, etc. Include any variables included but not presented or examined, but excluded from the final analysis. Please provide all the programs and workfiles and data necessary to replicate the analysis. Please include a Glossary of Variable Names for the analysis provided. Please deliver all data in the requested Data Format with an accompanying Data Dictionary. If these programs, workfiles, and data in the requested Data Format are already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-15. Please produce quarterly data for all variables underlying Tables 45 and 46 of USPS-T-7 in all available years after 1970, including but not limited to quarterly volume data for Bound Printed Matter. Please deliver this data in the requested Data Format with an accompanying Data Dictionary. If this data in the requested Data Format is already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-16. Please produce details of the exploratory analysis of Bound Printed Matter as presented in Tables 45 and 46 of USPS-T-7, including any variables included but not presented or examined, but then excluded from the final regression analysis. Please provide all the programs and workfiles necessary to replicate the analysis. Please include a Glossary of Variable Names for the analysis provided.

Please deliver all data in the requested Data Format with an accompanying Data Dictionary. If programs, workfiles and data in the requested Data Format are already available in library references LR-L-63 -- 66, please describe its location within the files.

POSTCOM/USPS-T7-17. In analyzing the cross-price elasticities of BPM with respect to Media Mail, and of Media Mail with respect to BPM, have you considered the content restrictions on BPM and Media Mail that may restrict the eligibility of the mail volumes for each subclass? If so, how? What volume data forms the basis of your assessment of these cross-price elasticities?

POSTCOM/USPS-T7-18. Please produce quarterly data regarding the percentage of volumes of Media Mail that would have been eligible for BPM rates in all available years after 1970. Please deliver this data in the requested Data Format with an accompanying Data Dictionary. If this data in the requested Data Format is already available in library references LR-L-63 -- 66, please describe its location within the files.