

Before the  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE:  
(OCA/USPS-100 - 111)  
(November 15, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate (OCA) hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

OCA's request for a more comprehensive Delivery Operations Information System (DOIS) database is a reflection of the policies and objectives articulated by the Commission in Order No. 1482.<sup>1</sup> In that Order, the Commission recognized that:

Attributable carrier street time cost estimates are central to any general rate case.

Ample time is needed to examine the complexities of any new study of these costs.

The CCSTS datasets, which cover a small fraction of all city carrier routes in the postal network, suffer from multiple deficiencies.

Screening deficient observations invites the problems that heavily truncated datasets entail.

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<sup>1</sup> "Order Accepting Certification and Sustaining, in Part, Objection of Intervenors to Designation of Responses to Presiding Officer's Information Requests for Inclusion in the Record," issued November 8, 2006.

Following the conclusion of the instant proceeding, the Commission will institute an informal rulemaking to determine the direction of future data collection and modeling.

OCA notes that the use of continuous time periods avoids the problems created by discontinuous time period data. OCA asked for discontinuous data in Docket No. R2005-1 because it was attempting to reduce the burden placed on the Postal Service. OCA has found the daily ZIP/route/day data provided by the Postal Service in the instant proceeding to be very valuable. It now appears worthwhile to expand the database to include all ZIP codes with city carrier routes, over a continuous three-year time period. These data will give OCA and other participants the raw material to make informed recommendations to the Commission in the upcoming informal rulemaking.

OCA also points out that the Presiding Officer has previously recognized the difficulty participants face in obtaining and utilizing important data in the traditional rate case timetable: what is left “unanswered, is how the OCA or any other participant who wants to develop an alternative study based on an alternative dataset could ever get its day in court,” under a rigid application of the rate case timetable.<sup>2</sup>

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<sup>2</sup> Presiding Officer’s Ruling No. R2005-1/46, “Presiding Officer’s Ruling Granting, in Part, Office of the Consumer Advocate Motion to Compel Responses to Interrogatories OCA/USPS-74, 76-77, 100(a), and 101,” issued July 8, 2005.

OCA thanks the Postal Service for its cooperation in providing Library Reference L-160 in the current proceeding. Having found a limited DOIS dataset to be extremely valuable in estimating the volume variability of city carrier costs in this proceeding, OCA believes that the Commission and all participants will benefit from having the full set of data available from DOIS as a basis for discussion and analysis in the upcoming informal rulemaking proceeding.

Respectfully submitted,

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OCA/USPS-100. This is a request for data from the Delivery Operations Information System (DOIS) database by ZIP/Route/Day of Week. Data are requested for two distinct sets:

Data for all ZIP codes and routes identified in USPS-LR-L-180. Data are requested on a daily basis for the time period October 1, 2003, through, and including, September 30, 2006.

Data for **all** City Carrier Delivery Routes in the postal network (within their corresponding ZIP codes), for the time period October 1, 2003, through, and including, September 30, 2006. Please omit special purpose routes.

The following data items are requested:

(a) Route Characteristics

Route Number (this may be encoded)

Delivery Mode, where

- C = curbline
- F = foot
- P = park & loop
- D = dismount
- O = other
- X = delivery mode not reported

Classification of delivery points by type of delivery point.

- Number of residential curbline possible delivery points
- Number of residential NDCBU possible delivery points
- Number of residential centralized possible delivery points
- Number of residential "other" possible delivery points
- Number of business curbline possible delivery points
- Number of business NDCBU possible delivery points
- Number of business centralized possible delivery points
- Number of business "other" possible delivery points

Whether a route has a specific carrier assigned to it

Number of carriers delivering the mail on the route for each particular day.

Route vehicle mileage

(b) ZIP Code Characteristics

ZIP Code (this may be encoded)  
Population  
Units - Total housing units  
Land - Square miles of land area  
Water - Square miles of water area

(c) Delivery Dates

Please provide the delivery dates; also:

Please identify each date that falls on a Sunday.  
Please identify each date that is a Postal Service holiday, i.e., when mail is not delivered.  
Please identify each route that is a business route.  
Within the set of business routes, please identify each route that does not receive Saturday delivery.

(d) Time Data

(Managed Service Point) MSP Scan data

- Scan for Hot Case
- Scan for first route delivery point
- Scan for last route delivery point
- Scan for re-entry to delivery office

Street Hours (from the Time and Attendance Control System (TACS)), as measured by

- Clock out to street
- Clock back in from street

(e) Mail Volumes

Total Delivery Point Sequenced Mail  
Automated flats  
Automated letters  
Cased flats  
Cased Letters

Parcels  
Priority Mail  
Sequenced flats, pieces  
Sequenced flats, number of sets  
Sequenced letters, pieces  
Sequenced letters, number of sets

- (f) Please provide definitions, or documentation references for the definition, for each variable provided. Identify all abbreviations or codes used in the database for each variable, i.e., state exactly what type of data is represented by each abbreviation, code, or label.

OCA/USPS-101. Has the Postal Service conducted, or does the Postal Service have available, any studies, analyses, reports, or discussions addressing difficulties or problems in collecting, measuring, standardizing, cleaning, or processing Delivery Operations Information System (DOIS) data? If the answer is affirmative, please provide all such materials. Also, identify and describe any changes made by the Postal Service to ensure that the difficulties were eliminated or reduced.

OCA/USPS-102. Has the Postal Service conducted, or does the Postal Service have available, any critiques and/or analyses of the usefulness and reliability of Delivery Operations Information System (DOIS) data? If the answer is affirmative, please provide the analyses and studies.

OCA/USPS-103. Please provide a description of the USPS standardization, quality control procedures, and data/information correction and manipulation procedures that are applied to the Delivery Operations Information System (DOIS) data. Please describe whether and/or how the procedure(s) have changed over time.

OCA/USPS-104. Please describe the extent to which the Delivery Operations Information System (DOIS) database observations for data items normally collected are either not collected or are subsequently eliminated by quality control efforts, resulting in entries that are zero or blank.

- (a) How does one know when zero time or zero volume data for a route-day are due to a non-delivery day?
- (b) How does one know when zero time or zero volume data for a route-day are due to failure to collect the data?
- (c) How does one know when zero time or zero volume data for a route-day are due to correction and subsequent elimination of the data item(s)?

OCA/USPS-105. Excluding special purpose routes, if a ZIP code is represented in the Delivery Operations Information System (DOIS) data, does the Postal Service attempt to collect DOIS data for routes and carriers for all days in that ZIP code? If the answer is negative, please explain.

OCA/USPS-106. For each of the mail volumes collected by the Delivery Operations Information System (DOIS) (e.g., DPS, automated letters, etc.) please state who collects and measures the volume (i.e., the letter carrier making a physical count, the delivery supervisor making a physical count, a sorting machine read by a manager, tubs of mail converted by someone into piece counts, etc.) and at what stage of the mail processing/distribution chain the data are collected (e.g., at the MODS facility, at the distribution facility, etc.). Have there been any changes in how the volumes are

collected? If so, please describe all such changes and give the dates (approximate dates are acceptable) for such changes.

OCA/USPS-107. Does the Delivery Operations Information System (DOIS) consistently include a zeroed observation for each Sunday and holiday?

- (a) Please explain.
- (b) Please explain how one can determine when zero Saturday observations are errors and when they occur simply because the observations are for business routes that are not delivered on Saturdays.
- (c) Please provide (or describe) the instructions given to delivery supervisors on how to enter Saturday data. If a route is not delivered on a Saturday (such as a business route), how should a delivery supervisor notate that in DOIS?
- (d) Please provide (or describe) the instructions given to delivery supervisors on how to treat Sundays when entering data in DOIS.
- (e) Please provide (or describe) the instructions given to delivery supervisors on how to treat postal holidays in DOIS. For purposes of this question, a postal holiday is defined as one that would normally be a delivery day, but for the holiday (i.e., no mail is delivered).

OCA/USPS-108. Have any ZIP codes been re-configured during the time period 10/1/03 through 9/30/06 within the strata referenced by witness Kelley in R2005-1?

- (a) Assuming that the response is affirmative, please provide a listing of ZIP code changes (encoded) by strata and explain the nature of the change.

- (b) Please provide a listing of new ZIP codes that were added to the postal network during the period 10/1/03 through 9/30/06.
- (c) Please provide a comprehensive list of **all** ZIP code re-configurations that took place during the period 10/1/03 through 9/30/06 (for ZIP codes that had one or more city carrier routes). Explain the nature of the re-configurations.

OCA/USPS-109. The program "City Carrier Street Time Model.2004 data.variability equations.encrypted.sas" is presented in USPS-LR-L-180. The program references a number of files: Street.Time.MaskedZips.prn, LFVolume.MaskedZips.prn, PAVolume.MaskedZips.prn, Possible.Del.Points.MaskedZips.prn, and Density.MaskedZips.prn. None of the files is provided in "prn" format in USPS-LR-L-179. Please provide the files in "prn" format.

OCA/USPS-110. In lieu of the referenced ".prn" files, a number of Excel files which appear generally to provide the data required to run the program "City Carrier Street Time Model.2004" are provided in USPS-LR-L-180. In some cases the variable names used in the SAS program in USPS-LR-L-180 are not consistent with the variable names used in the Excel files provided in USPS-LR-L-179. Accordingly, OCA requests clarification of variable names.

- (a) Please provide a 1-1 mapping of the names used in the SAS program in USPS-LR-L-180 in reading the file associated with Time with the names in the Excel file Street.Time.maskedZips.xls, found in USPS-LR-L-179.

- (b) In the case of Street.Time.maskedZips.xls in USPS-LR-L-179 there appear to be more columns than data items read by the SAS program. Please explain the additional data items and their potential usage.

OCA/USPS-111. In attempting to run the SAS program in USPS-LR-L-180, one obtains the following information in the SAS Log:

```

75 ***** ;
76 *** This section of the program converts alphabetic route numbers*** ;
77 *** and constructs a unique Zip-Route ID for each route***** ;
78 ***** ;
79
80 Data time2; set time1;
81 if mzip='62398' and rt='02' then rt='01';
82 if rt = 'XX' then rt=99.9;
83 if rt = '0A' or rt = '0B' or rt = '0D' or rt = '0E' or rt = '0w'
84 or rt = '1A' or rt = '4A' or rt = '4B' or rt = 'A7' or rt = 'C2'
85 or rt = 'C3' or rt = 'CA' or rt = 'CK' or rt = 'CT' or rt = 'CV'
86 or rt = 'ES' or rt = 'EV' or rt = 'F1' or rt = 'G5' or rt = 'HK'
87 or rt = 'IT' or rt = 'L1' or rt = 'L3' or rt = 'L7' or rt = 'MD'
88 or rt = 'MF' or rt = 'O1' or rt = 'O2' or rt = 'O5' or rt = 'O7'
89 or rt = 'OL' or rt = 'P1' or rt = 'P2' or rt = 'RE' or rt = 'UX'
90 or rt = 'VY' or rt = 'W8' or rt = '1M' or rt = 'AT' or rt = 'CD'
91 or rt = 'OS' or rt = 'SA' or rt = 'SJ' or rt = 'SS' or rt = 'TH'
92 or rt = 'C1' or rt = 'C9' or rt = '5A' or rt = 'XP' or rt = 'LK'
93 or rt = 'P6' or rt = 'S9'
94 then nrt=11.1;
95 else nrt=rt;
96 rtind=nrt/100;
97 ziprt=mzip+rtind;
98 run;

```

NOTE: Character values have been converted to numeric values at the places given by: (Line):(Column).  
81:9 95:10

NOTE: Numeric values have been converted to character values at the places given by: (Line):(Column).  
82:22

NOTE: Invalid numeric data, rt='519C0004', at line 95 column 10.  
mzip=10303 rt=519C0004 date=22APR2004 lfdt=0 cudt=0 ndct=0 vmdt=0 cedt=0 dmdt=0  
ddtt=0 ntt=1076 tftt=1060 rlt=0 gct=0 ect=0 pdt=716 adt=0 padt=0 padt2=0 cpdt=0  
nonstrt=0 offclock=0 strtprep=0 na=2490 nrt=. rtind=. ziprt=. \_ERROR\_=1 \_N\_=6

NOTE: Invalid numeric data, rt='519C0004', at line 95 column 10.  
mzip=10303 rt=519C0004 date=23APR2004 lfdt=0 cudt=0 ndct=0 vmdt=0 cedt=0 dmdt=0  
ddtt=0 ntt=10519 tftt=2162 rlt=0 gct=0 ect=0 pdt=2736 adt=523 padt=0 padt2=13  
cpdt=0 nonstrt=0 offclock=0 strtprep=0 na=1210 nrt=. rtind=. ziprt=. \_ERROR\_=1  
\_N\_=7

NOTE: Invalid numeric data, rt='519C0004', at line 95 column 10.  
mzip=10303 rt=519C0004 date=24APR2004 lfdt=0 cudt=0 ndct=11490 vmdt=0 cedt=0  
dmdt=0 ddtt=0 ntt=0 tftt=2475 rlt=0 gct=0 ect=0 pdt=3255 adt=150 padt=0 padt2=0  
cpdt=0 nonstrt=0 offclock=0 strtprep=0 na=1623 nrt=. rtind=. ziprt=. \_ERROR\_=1  
\_N\_=8

The program eventually reaches the limit for reportable errors. An examination of the databases appears to show that the variable "date" is in the form of a character variable

in the Street Time database, but is in the form of a numeric variable in both of the volume databases. The variable "route" appears to be a character variable in all three databases. However, there seems to be some automatic conversion of character and numeric variables in the SAS log, after line 98. This may be indicative of a problem; in any case, the databases furnished do not appear to be compatible with the program.

- (a) Please identify needed corrections to the SAS program in order that it will reproduce the results reported in USPS-LR-L-180 when using the data from the furnished Excel files in USPS-LR-L-179.
- (b) Please provide the appropriate databases(s) so that the program will run.