

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OCA (OCA/USPS-109 - 111)  
(November 27, 2006)

The United States Postal Service hereby objects to the following interrogatories of the OCA: OCA/USPS-109 – 111, filed on November 15, 2006. Although the Postal Service is likely to file responses to these questions, it does not intend to waive the objections identified below.

All of these questions attempt to follow-up on the set of materials filed by the Postal Service in response to various items of POIR No. 4. The materials were filed on Sept. 22, 2006. According to Rule 26, even assuming that follow-ups are permitted to POIR responses to the same extent as they are permitted to responses to interrogatories of a party, any timely follow-ups would have been due within 7 days of September 22. November 15 obviously falls well outside the period for timely follow-ups, and the Postal Service objects on that basis.

Questions 109-111 from the OCA, however, are also quite similar to earlier questions posed in October by Time Warner and Advo. (In fact, they are so similar that they are in large measure cumulative and redundant, and objectionable on that basis as well.) In a partial objection to Time Warner and Advo questions 1-9, filed on October 20, 2006, the Postal Service explained its further objection to responding to those questions, but also explained why, under the circumstances, it would respond anyway

(without waiving its objections). The views expressed there by the Postal Service fully apply as well with respect to OCA questions 109-111.

Therefore, notwithstanding any responses which it may file, the Postal Service wishes to preserve its objection to OCA/USPS-109 – 111 on the grounds of improper and untimely follow-up.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 27, 2006

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*** ;
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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 tfitt=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 tfitt=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 tfitt=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.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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