

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

INTERROGATORIES OF TIME WARNER INC. AND ADVO, INC.
TO THE UNITED STATES POSTAL SERVICE (TW/ADVO-USPS-1-7)

(October 10, 2006)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. and ADVO, Inc. direct the following interrogatories to the United States Postal Service relating to its responses to POIR No. 4 and USPS LR L-179 and 180. We request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,

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TIME WARNER INC. AND ADVO, INC. INTERROGATORIES TO USPS

TW/ADVO/USPS-1. Please refer to your response to POIR No. 4 Item 11.

As part of our review of your SAS regression program identified below, we converted the following five excel data files in LR L-179:

- Street.Time.MaskedZips.
- LfVolume.MaskedZips
- PAVolume.MaskedZips
- Possible.Del.Pts.MaskedZips.
- Density.MaskedZips

to comma delimited format. We then entered those five CSV data files into the LR L-180 SAS program **CityCarrierStreetTimeModel.2004data.variabilities** as sources for the files TIME, LfVOL, PAVOL, DELPT, and DENSE. However, we have been unable to run the program completely through and generate results. The program stops at line 1049 (of the LR L-180 SAS Log). At this point, the program attempts to divide route number (from the TIME data set) by 100. After initial data cleaning performed up through line 1047, there still appear to be numerous route-zip-day observations containing character (alphanumeric) data in the **rt** variable, referenced in this section of the code. We see no programming to eliminate the alpha portions of values contained in the **rt** variable for such observations which contain both alphabetic and numeric data. Given this problem, please provide the following:

- (a) Confirmation that where you construct SAS data set TIME1 (SAS log row 1022), the variable **rt \$** from data file TIME is a character (alphanumeric) variable. If not, please explain.

- (b) Confirmation that the variable **rt** created in SAS data set TIME2 (SAS Log row 1034) is the same as **rt \$** in (a) above and also a character (alphanumeric) variable. If not, please explain.
- (c) Confirmation that:
- i) A new variable **nrt** in SAS data set TIME 2 is created and assigned values from variable **rt** in line 1048 of the log, and that
 - ii) **nrt** is also a numeric variable containing numeric data, only when **rt** contains numeric data (in character format) If not, please explain.
- (d) Confirmation that variable **rtind** in SAS data set TIME 2 is constructed by dividing the variable **nrt** by 100 which is only accepted by SAS when the latter contains only numeric data (SAS Log row 1049). (This is where our replication attempts are stopped.) If not, please explain.
- (e) Confirmation that variable **ziprt** created for SAS data set TIME 2 is used as the common variable by which to merge zip-route-day observations from TIME3, LRVOL3, and PAVOL3 to form the zip-route-day data set COMB (SAS log row 1172). If not, please explain.

TW/ADVO/USPS-2. With respect to your responses to TW/ADVO/USPS-1 above, please provide the proper data sets for use with the LR L-180 SAS program

CityCarrierStreetTimeModel.2004data.variabilities:

- Street.Time.MaskedZips.prn
- LRVolume.MaskedZips.prn

- PAVolume.MaskedZips.prn
- Possible.Del.Pts.MaskedZips.prn
- Density.MaskedZips.prn

and/or programming changes that permit replication of witness Bradley's model results in response to POIR No. 4 Item 11 and in LR L-180.

TW/ADVO/USPS-3. Please list and explain all differences between the five final excel data files in LR L-179 (listed in TW/ADVO/USPS-1 above) and the data files provided in response to TW/ADVO/USPS-2.

TW/ADVO/USPS-4. With respect to the LR L-180 SAS program

CityCarrierStreetTimeModel.2004data.variabilities, please provide the following:

- (a) Confirmation that where you construct SAS data set DPOINTS1 from data file DELPT (SAS log row 1009), the variable **rteno \$** which is read into DPOINTS1 is a character (alphanumeric) variable. If not, please explain.
- (b) Confirmation that where you construct SAS data set LFVOL1 from data file LFVOL (SAS log row 1071), the variable **rteno** which is read into LFVOL1 is a numeric variable. If not, please explain.
- (c) Confirmation that where you construct SAS data set PAVOL1 from data file PAVOL (SAS log row 1105), the variable **rteno\$** which is read into PAVOL1 is a character (alphanumeric) variable. If not, please explain.

- (d) If you do confirm (a), (b), (c) above, please explain why the indicated route number variable from the three input files was entered twice as a character (alphanumeric) variable and once as a numeric variable.
- (e) Confirmation that the rteno variable cited in (a), (b) and (c) above contains only numeric data, regardless of whether the variable was formatted as a character variable (twice) or a numeric variable (once). If not, please explain.
- (f) If you do confirm (e) above and (a) from ADVO/USPS-1, then please explain why route identifiers by zip code were entered as numeric data in three instances and as character data in one instance.

TW/ADVO/USPS-5. If you do confirm (a), (b) and (c) in TW/ADVO/USPS-4 and (a) in TW/ADVO/USPS-1, please explain why a different variable name (**rt** instead of **rteno**) was employed to collect route identifier data contained in the TIME data file.

TW/ADVO/USPS-6. Given the differences in how the route identifier data were collected, named and manipulated within your SAS program, please explain how these data were maintained without error to ensure correct alignment of zip-route-day data during the merge procedure to form SAS data set COMB from the separate LRVOL3, PAVOL3 and TIME3 data sets. Please explain fully.

TW/ADVO/USPS-7. Did you run any tests or checks to ensure correct alignment of zip-route-day data resulting from the merge procedure to form data set COMB and

the subsequent merge to form data set COMBDEL (log line 1176)? If you did, please provide the results. If you did not, please explain why not.