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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications ) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
MOTION TO COMPEL A RESPONSE  
TO INTERROGATORY OCA/USPS-25(a)  
(August 20, 1996)

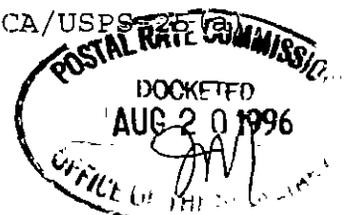
The Office of the Consumer Advocate (OCA) requests that the Presiding Officer direct the Postal Service to respond to interrogatory OCA/USPS-25(a). That interrogatory, filed August 9, 1996, requests a table showing the actual number of employees in each stratum of the In-Office Cost System (IOCS) sample.<sup>1</sup> The Service has objected to this interrogatory on grounds of relevance and burden.<sup>2</sup>

As is so often the case, the Postal Service has failed to provide an estimate of time needed to prepare a response as required by section 25(c) of the rules of practice. Thus, the OCA is unable to address the Service's burden argument, and the

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<sup>1</sup> See OCA Interrogatories to USPS (OCA/USPS-21-30), August 9, 1996.

<sup>2</sup> Objection of the USPS to OCA Interrogatory OCA/USPS-25(a), August 19, 1996.



presiding officer should ignore it. The OCA would note, however, that the requested table would seem to require input data of the same type used to generate the National Payroll Hours Summary Report.

Interrogatory OCA/USPS-25(a) is designed to accomplish the same purpose as interrogatory OCA/USPS-T7-18 in Docket No. MC96-2. That interrogatory was designed, as is OCA/USPS-25(a), to allow a comparison of estimates to known values of the estimates as a means of judging reliability of both the estimates and the sampling procedure that generated the estimates. The Postal Service objected to interrogatory OCA/USPS-T7-18 on grounds of relevance, burden, and confidentiality. The presiding officer overruled the objection and directed the Service to provide a response.<sup>3</sup> Given that the Postal Service has raised no confidentiality concerns in its objection to OCA/USPS-25(a), and given that it has provided no estimate of burden that approaches the burden estimated with respect to OCA/USPS-T7-18, Ruling MC96-2/7 requires that the Service respond to OCA/USPS-25(a).

The table requested in interrogatory OCA/USPS-25(a) is relevant to judge the overall reliability of the IOCS. Although employee universe counts are not used to generate IOCS cost

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<sup>3</sup> Presiding Officer's Ruling No. MC96-2/7.

estimates (a fact that the OCA is well aware of—see interrogatory OCA/USPS-22), they are useful for evaluating the reliability of the IOCS. The IOCS generates implicit estimates of employee universe counts.<sup>4</sup> If IOCS estimates of employee universe counts are inaccurate, then other estimates may be inaccurate. As the Commission itself recently noted,<sup>5</sup> there is “need for a substantial evaluation effort to identify and attempt to quantify survey errors that may be associated with postal surveys . . . .”

The IOCS is one of the most important sampling efforts undertaken by the Postal Service. The need for accurate cost data is unquestioned. The burden associated with responding to interrogatory OCA/USPS-25(a) may be high. However, if there is to be “a substantial evaluation effort” undertaken with respect to the IOCS, then a significant burden is unavoidable.

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<sup>4</sup> Both the overall sampling rate (which is the product of office sampling rate and employee sampling rate) by craft and CAG and the actual number of employees sampled by craft and CAG are known for each pay period. The IOCS estimate of employee universe counts in a given pay period by craft and CAG is thus simply the actual number of employees sampled in that pay period divided by the overall sampling rate (by craft and CAG). See LR-SSR-90 at 15.

<sup>5</sup> PRC Op. MC96-2 at 30.

WHEREFORE the OCA requests the presiding officer to direct the Postal Service to respond to interrogatory OCA/USPS-25(a).

Respectfully submitted,



EMMETT RAND COSTICH  
Assistant Director

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



EMMETT RAND COSTICH  
Attorney

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