

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

Postal Rate and Fee Changes)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DENNIS P. STEVENS (OCA/USPS-T15-11-16)
May 27, 2005

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T15-11. Please refer to CostPool2.final, found in Library Reference K-79. Columns D through K are labeled possible deliveries.

- a. Please confirm that the possible deliveries are delivery points (i.e., mutually exclusive locations for the receipt of mail which, however, may be contiguous). If you do not confirm, please explain.
- b. Are there any other possible deliveries that are not accounted for in a route--that is, any possible deliveries that are not included in the current data set? If your answer is affirmative, please explain and provide the data.
- c. Is it correct that if one sums for a specific day all of the possible delivery points as referenced in (a) and (b) for all routes in a ZIP Code, then one has all of the possible delivery points in the ZIP Code for that specific date? If your answer is not affirmative, please explain in detail.
- d. Is it correct that all of the ZIP Codes for which witness Bradley performs an analysis are represented in the CostPool2.final database? If your answer is negative, please explain in detail.
- e. Is it correct that the possible deliveries for each of witness Bradley's ZIP Codes can be found using the procedure outlined in (b)? Please explain.

OCA/USPS-T15-12. Please refer to CostPool2.final, found in Library Reference K-79.

- a. Please confirm that columns N through R represent actual deliveries of mail in terms of numbers of pieces of mail, excluding parcels and accountables. If you do not confirm, please explain in detail.
- b. Is it correct that if one sums for a specific day all of the actual deliveries of pieces of mail for all routes in a ZIP Code, excluding parcels and accountables, then one

has all of the actual deliveries of mail in the ZIP Code for that specific date? If you do not confirm, please explain in detail.

OCA/USPS-T15-13. Please refer to page 1 of “City Carrier Street Time Survey—Time Pool Datasets” in USPS LR-K-79. The file “MDCD.Archive.subset.v4mask.data” reports data for over 1.3 million records. Some of the variables have been discussed, defined, and/or implicitly or explicitly referenced in various USPS filed documents. For purposes of clarity, please define each of the variables listed below, from RTEZIP through ROUTE.

filename datacoll 'c:\bradley2005\lrk79\MDCD.Archive.subset.v4mask.data';

DATA MDCD;

INFILE DATACOLL;

INPUT

@1 DATE MMDDYY8.

@10 RTEZIP 7.2

@18 SCANZIP 7.2

@28 ROUTENO \$2.

@30 EMP \$4.

@34 CTIME \$8.

@42 ONFRAME 1.

@43 DELMODE \$1.

@44 BARCODE 3.

@47 BCURB 5.

@52 BNDCBU 5.

@57 BCENT 5.

@62 BOTHR 5.

@67 RCURB 5.

@72 RNDCBU 5.

@77 RCENT 5.

@82 ROTHTR 5.

@87 ROUTE \$8.;

OCA/USPS-T15-14. Please refer to page 1 of “City Carrier Street Time Survey—Time Pool Datasets” in USPS LR-K-79. You list the file “Barcode.Scans.xls”.

- a. Is this file read into the program as the file “pools”? If your answer is negative, please explain in detail, including a statement of where, if anywhere, the files “Barcode.Scans.xls” enters the program. If the file is not used in the program, please explain the use of the file.
- b. There appear to be three variables in the file “pools”. Is this the entry of Scan6.text? Please explain as appropriate.

OCA/USPS-T15-15. Please refer to page 2 of “City Carrier Street Time Survey—Time Pool Datasets” in USPS LR-K-79. You list the file “ACTIVITY.DEFINITIONS.DOC”. Please state the location of the file; *i.e.*, where can it be found? If the file has not been provided, then please provide it.

OCA/USPS-T15-16. Please refer to page 5 of “City Carrier Street Time Survey—Time Pool Datasets” in USPS LR-K-79. You discuss COSTPOOL2.FINAL.XLS. Are the ZIP Codes in this file correct and consistent with the corrected ZIP Codes in other Postal Service filings? Please explain.