

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF POSTAL SERVICE WITNESS STEVENS  
TO INTERROGATORIES OF THE OCA (OCA/USPS-T15-11 - 16)  
(June 10, 2005)

The United States Postal Service hereby provides the response of witness Stevens to the following interrogatories of the OCA, filed on May 27, 2005: OCA/USPS-T15-11 - 16.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

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June 10, 2005

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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.

**Response:**

- a. Confirmed.
- b. The possible deliveries in this data set are drawn from the Postal Service's Address Management System and are the official measure of possible deliveries for each route. While the AMS is regularly updated and believed to be accurate, there could be deliveries that are no longer active and not known to the carrier, as well as new possible deliveries that have not yet been recorded in the database. This number is thought to be quite small, however.
- c. Not confirmed. See b.
- d. Yes.
- e. Part b does not outline a procedure. The possible deliveries used by Witness Bradley for each Zip Code are the sum of the possible deliveries

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for the routes within that Zip Code. These can be found in  
COSTPOOL2.FINAL. XLS. The sums of columns D through K are the  
possible deliveries for the route.

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**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.

**Response:**

- a. Not Confirmed. Columns N through R are the total time spent delivering mail within curblines, NDCBU, VIM, Central and Dismount route sections.
- b. No, see the response to a. The numbers of deliveries actually receiving mail are not recorded in Costpool2.Final.xls. The sum of columns D through K is the total of the possible deliveries for the route. Moreover, actual deliveries could include deliveries by carriers not included on the specific day because of lack of training, route inspections, etc.

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**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 ROTH 5.  
@87 ROUTE \$8.;

**Response:**

Please see OCA/USPS T-15 8f.

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**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.

**Response:**

- a. Not confirmed. The three variables in the file “pools” are read in from Scan6.text. Barcode.Scans.xls is provided for information purposes, as it contains the definitions for the barcodes shown in Scan6.text.
- b. See a.

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**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.

**Response:**

Please see OCA/USPS-T15-9.

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**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.

**RESPONSE:**

Please see OCA/USPS-T15-4.

## 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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