

ORIGINAL

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
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-1-4)
June 19, 1996

Pursuant to sections 25 and 26 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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W.,

Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including microfilms, punch cards, or other cards, and tapes or recordings used in data processing together with any written material necessary to understand or use such punch cards, tapes or other recordings.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were

performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

OCA/USPS-1. Refer to the Postal Service's Request at 3 where it states "any net revenue resulting from these proposals will be helpful in meeting the Postal Service's goals for recovery of Prior Years' Loss amounts." Please confirm that Postal management intends to use net revenues resulting from proposals in the Request for the sole purpose of recovering Prior Years' Loss amounts.

- a. If you cannot confirm, does Postal management intend to use net revenues resulting from the proposals to extend the rate cycle, refinance USPS debt, or restructure the organization of the Postal Service?
- b. If you cannot confirm, what amount of net revenues resulting from the proposals will be used to recover Prior Years' Loss amounts? What amount of net revenues will be used to extend the rate cycle? What amount of net revenues will be used to refinance USPS debt, or restructure the organization of the Postal Service?

OCA/USPS-2. Refer to the Postal Service's Request at 3 where it states "any net revenue resulting from these proposals will be helpful in meeting the Postal Service's goals for recovery of Prior Years' Loss amounts." What are the Postal Service's goals for the recovery of Prior Years' Loss amounts? Please be specific. Please provide any documents setting forth these goals.

OCA/USPS-3. Refer to the Notice of Filing of Library References, June 7, 1996. Please provide the Fiscal Year 1995 version of the Summary Description of USPS Development of Costs by Segments and Components.

OCA/USPS-4. Refer to the Notice of Filing of Library References, June 7, 1996. Please confirm that the information contained in the following Library References is for Fiscal Year 1995. If you do not confirm, please provide the Fiscal Year 1995 information.

- SSR-4 Cost and Revenue Analysis/Rollforward, Input Data Files
- SSR-5 Cost and Revenue Analysis/Rollforward, Processing Documentation Reports
- SSR-6 Cost and Revenue Analysis/Rollforward, Documentation - Tapes

SSR-7 Cost and Revenue Analysis/Attributable Costs Disks

SSR-8 Rollforward Test Year Volume Variable Cost
Footnotes

SSR-11 Rollforward Expense Factors

SSR-12 In-Office Cost System (IOCS), Handbook F-45

SSR-13 In-Office Cost System (IOCS), Checking and
Verification Procedures

SSR-14 In-Office Cost System (IOCS), Computer System
Documentation Description

SSR-15 In-Office Cost System (IOCS), Listing of Input
Data

SSR-16 In-Office Cost System (IOCS), Machine-readable
Copy of Databases

SSR-17 In-Office Cost System (IOCS), Postal Service ADP
Documentation, In-Office Cost FOSDIC Subsystem

SSR-18 In-Office Cost System (IOCS), Postal Service ADP
Documentation, Cost Allocation Subsystem

SSR-19 In-Office Cost System (IOCS), Source Code Listings

SSR-20 In-Office Cost System (IOCS), Source Programs in
Machine-readable Form

SSR-21 In-Office Cost System (IOCS), Listing of Output
Data

SSR-22 In-Office Cost System (IOCS), Machine-readable
Copy of Output Data

SSR-23 IOCS Tally Analysis Documentation

SSR-24 Carrier Cost Systems, Handbook F-56 and F-55 (Test
Instructions), and Form 2848

SSR-25 Carrier Cost Systems, Computer System
Documentation Description

- SSR-26 Carrier Cost Systems, Listing of Input Data
- SSR-27 Carrier Cost Systems, Machine-readable Copy of Databases
- SSR-28 Carrier Cost Systems, Postal Service ADP Documentation, Carrier Sample Selection
- SSR-29 Carrier Cost Systems, Postal Service ADP Documentation, City Carrier Cost Subsystem
- SSR-30 Carrier Cost Systems, Postal Service ADP Documentation, Rural Carrier Cost Subsystem
- SSR-31 City Carrier Cost Subsystems SAS Distribution Key Development
- SSR-32 Rural Carrier Cost Subsystem SAS Distribution Key Development
- SSR-33 Carrier Cost Systems, Source Code Listings
- SSR-34 Carrier Cost Systems, Source Programs in Machine-readable Form
- SSR-35 Carrier Cost Systems, Listing of Output Data
- SSR-36 Carrier Cost Systems, Machine-readable Copy of Output Data
- SSR-37 In-Office Cost System, Carrier Cost Systems, Upload/Download Programs
- SSR-38 Revenue, Pieces, and Weight System (RPW), Computer System Documentation Description
- SSR-39 ODIS/RPW Frame System, Postal Service ADP Documentation, ODIS/RPW Frame Maintenance
- SSR-40 Revenue, Pieces, and Weight System (RPW), Machine-readable Copy of Databases
- SSR-41 Revenue, Pieces, and Weight System (RPW), Postal Service ADP Documentation, Domestic RPW

- SSR-42 Revenue, Pieces, and Weight System (RPW), Postal Service ADP Documentation, Bound Printed Matter
- SSR-43 Lotus 123 Spreadsheet - RPW Adjustment System
- SSR-44 Revenue, Pieces, and Weight System (RPW), Source Code Listings
- SSR-45 Revenue, Pieces, and Weight System (RPW), Source Programs in Machine-readable Form
- SSR-46 Revenue, Pieces, and Weight System (RPW), Listing of Output Data
- SSR-47 Revenue, Pieces, and Weight System (RPW), Machine-readable Copy of Output Data
- SSR-48 ODIS/RPW Frame System, Postal Service ADP Documentation, RPW Domestic System
- SSR-49 ODIS/RPW Frame System, Computer System Documentation Description
- SSR-50 ODIS/RPW Frame System, Postal Service ADP Documentation, ODIS/RPW Frame Check
- SSR-51 ODIS/RPW Frame System, Postal Service ADP Documentation, RPW CAG Changes
- SSR-52 ODIS/RPW Frame System, Postal Service ADP Documentation, ODIS/RPW Frame Entity Operation (ORFEO)
- SSR-53 CODES - MEPS, Computer System Documentation Description
- SSR-54 CODES - MEPS, DMBS User Guide
- SSR-55 CODES - MEPS, Postal Service ADP Documentation, Base Unit and Source Code Listings
- SSR-56 CODES - MEPS, Source Programs in Machine-readable Form

SSR-57 ORFEO Report Extract System

SSR-58 Jointly Scheduled Tests

SSR-59 ODIS/RPW Frame System, Source Code Listings

SSR-59 ODIS/RPW Frame System, Source Programs in Machine-readable Form

SSR-62 CODES - IOCS, Computer System Documentation Description

SSR-63 CODES - IOCS, Postal Service ADP Documentation, Laptop and Base Unit

SSR-64 CODES - IOCS, Postal Service ADP Documentation, Mainframe

SSR-65 CODES - IOCS, Source Code Listings

SSR-66 CODES - IOCS, Source Programs in Machine-readable Form

SSR-67 CODES - RPW, Computer System Documentation Description

SSR-68 CODES - RPW, Postal Service ADP Documentation, Laptop

SSR-69 CODES - RPW, Postal Service ADP Documentation, Base Unit

SSR-70 CODES - RPW, Postal Service ADP Documentation, Mainframe

SSR-71 CODES - RPW, Source Code Listings

SSR-72 CODES - RPW, Source Programs in Machine-readable Form

SSR-73 Permit System, User Guide

SSR-74 Permit System, Computer System Documentation Description

SSR-76 Permit System, Machine-readable Copy of Source Code

SSR-77 Permit System, Postal Service ADP Documentation

SSR-78 Permit System, Source Code Listings

SSR-79 TRACS Sample Design Programs and Documentation -- Highway and Rail

SSR-80 TRACS Sample Design Programs and Documentation Air

SSR-81 TRACS Edit Check Programs and Documentation

SSR-82 TRACS Estimation Programs and Documentation -- Highway and Rail

SSR-83 TRACS Estimation Programs and Documentation -- Air

SSR-84 TRACS Source Programs and Data Files in Machine-readable Form

SSR-85 Amtrak Distribution Key Development Programs and Documentation

SSR-86 Eagle Network Distribution Key Development Programs and Documentation

SSR-87 Transportation Model Tape Documentation

SSR-88 Estimated Functional Accrued Costs by Subfunctions and Cost Categories

SSR-89 ODIS/RPW Frame System, Postal Service ADP Documentation, Sampling Frame Subsystem

SSR-90 Statistical Systems Documentation

SSR 91 Base Year Equipment and Facility Related Costs

SSR-92 SAS ODIS Extract

SSR-93 Determination of Possible Box Deliveries

- SSR-94 RPW Sample Selection System, Computer System Documentation Description
- SSR-95 RPW Sample Selection System, Listing of Input Data
- SSR-96 RPW Sample Selection System, Machine Readable Input Data
- SSR-97 RPW Sample Selection System, ADP Documentation
- SSR-98 RPW Sample Selection System, Machine Readable Source Code
- SSR-99 Estimation of the Costs for Space Rented
- SSR-100 Development of Piggyback and Related Factors
- SSR-117 In-Office Cost System (IOCS), Postal Service ADP Documentation, IOCS Sample Selection Subsystem

Respectfully submitted,



GAIL WILLETTE
Director
Office of the Consumer Advocate



DAVID RUDERMAN
Attorney

Docket No. MC96-3

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 12 of the rules of practice.



DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0001
June 19, 1996