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

| SPECIAL SERVICES REFORM, 1996 | Docket No. MC96-3 |

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-65(a), (b), (c), and (g), 66(b) and (c)(iii), 67(b) and (c)(iii), AND 69)

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-65(a) (in part), (b), (c), and (g), 66(b) and (c)(iii), 67(b) and (c)(iii), and 69, filed on August 30, 1996. Objections to interrogatories OCA/USPS-65(d), (e), (f), and (h), 66 (a), (c)(i) and (ii), 67(a), (c)(i) and (ii), and 68, and a partial objection to OCA/USPS-65(a) were filed on September 9, 1996.

Each interrogatory is stated verbatim and is followed by the response.
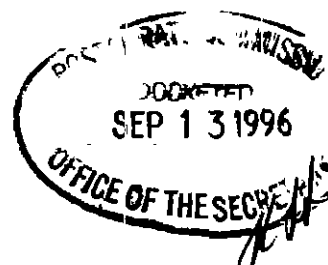
Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 13, 1996

OCA/USPS-65. This interrogatory refers to the data files and programs
contained in SSR-84 for TRACS Highway and to the program documentation in
SSR-82. The first program of SSR-82 is named
TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY) and it reads a flat file named
TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

a.   Please confirm that the flat file
        TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT is named
        ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT on the tapes accompanying
        SSR-84. If you do not confirm, please state which SSR-84 file is a copy of
        TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT or provide a copy of
        TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

b.   Please refer to page 108 of SSR-84. Please confirm that
        ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT was created by copying file
        TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT, which is a
        different file name than TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT. If
        you do not confirm, please explain what file was copied to produce the file
        ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT.

c.   Please confirm that the file
        TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT is an exact copy of
        file TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT with the only change
        being the insertion of ".SAFE" into the file name. If you do not confirm,
        please list all modifications made to produce the "SAFE" file
        TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT.

d.   Please provide a program listing showing that
        TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY) executes properly with
        ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT as the input file instead of
        TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT. If this is not possible,
        please provide a program and data file that work together.

e.   Please provide a printout showing the first 60 records (corresponding to
        the first 20 observations) of the flat file
        ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT.

f.   Please provide a printout showing the first 60 records (corresponding to
        the first 20 observations) of the flat file
        TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

g.   Please refer to page 18 of SSR-82 and to page 108 of SSR-84. Please
        confirm that the record length (LRECL) for
        TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT is 250 but the record
        length (LRECL) for ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT is only
        180. Please explain the reason for this difference and the effects on the
        program TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY).

h.   If any TRACS files are provided in response to this interrogatory, please provide the files on a diskette (or other medium such as CD-ROM) in a format easily accessible by PCs.

OCA/USPS-65 Response:

a.   Confirmed. TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT is named

ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT on the submitted data tape.

The difference other than file name is the deleting of commercially

sensitive information. Partial objection filed September 9, 1996.

b.   Confirmed. ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT was created by

copying the file TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT,

which is a different file name than

TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT.

c.   Not confirmed. In addition to the insertion of ".SAFE" in to the file name,

TRACSSMN.SAFE.HIGHWAY.PQ495.SURVEY.TEXT is different from

TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT in that commercially

sensitive information has been deleted.

d.   Objection filed September 9, 1996.

e.   Objection filed September 9, 1996.

f.   Objection filed September 9, 1996.

g.   Confirmed. The LRECL (logical record length) was changed from 250 to

180 during the rewriting of the file. This change in record length has

nothing to do with the deleting of commercially sensitive information, but

rather is the intended result of a deliberate effort to conserve tape space

by eliminating excess record space. A review of the first program of SSR-

82, TRACS.EXPAND.HWY.PQ495.CNTL(SURVEY), which reads in the

file TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT, will reveal that the

LRECL only needs to be 171 to accommodate the rightmost variable,

P2PIECE4, which begins at column 167 and occupies 5 character-

spaces. The additional space on the record up to column 250 is excess

space and serves no practical purpose. A LRECL of 180 was chosen

because it was the smallest possible LRECL that would accommodate all

of the variables and also divide evenly into the block size.

h.   Objection filed September 9, 1996.

OCA/USPS-66. Please refer to page 3 of SSR-82. This lists 4 data sets (in addition to TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT) that are supplied with the programs for TRACS Highway.

a.   Please provide these files on a diskette (or other medium such as CD ROM) in a format easily accessible by PCs.

b.   For each of these files, please confirm that the file provided in SSR-84 is an exact copy of the file listed on page 3 of SSR-82.

c.   For each SSR-84 file that is not a duplicate of the corresponding SSR-82 file,

      i.   Please provide a file that is a copy of the corresponding file listed on page 3.

      ii.   Please confirm that the unmodified SSR-82 programs operate correctly on the SSR-84 data file. If you do not confirm, please provide programs modified so that they operate correctly on the data files provided in SSR-84.

      iii.   If the file provided in SSR-84 was copied from a "SAFE" file that differs from the actual file used in SSR-82, please explain all modifications made to construct the "SAFE" file.

OCA/USPS-66 Response:

a.   Objection filed September 9, 1996.

b.   Not confirmed. In the files provided in SSR-84, commercially sensitive information has been deleted. Additionally, page 3 of SSR-82 contains an error. The filename listed as TRACSSMN.HIGHWAY.MILES.PQ495.TEXT should read TRACSSMN.HIGHWAY.MILES.PQ395.TEXT. The PQ495 miles file is created by updating the prior quarter's (PQ395) miles file with the current quarter's (PQ495) update file, TRACSSMN.MILES.UPDATE.PQ495.TEXT.

c.i.   Objection filed September 9, 1996.

c.ii.   Objection filed September 9, 1996.

c.iii.   The "SAFE" files were created by deleting commercially sensitive

information while copying the original files.

OCA/USPS-67. Please refer to page 342 of SSR-82. This lists 4 data sets that are supplied with the programs for TRACS Rail.

a.   Please provide these files on a diskette (or other medium such as CD ROM) in a format easily accessible by PCs.

b.   For each of these files, please confirm that the file provided in SSR-84 is an exact copy of the file listed on page 342 of SSR-82.

c.   For each SSR-84 file that is not a duplicate of the corresponding SSR-82 file,

    i.   Please provide a file that is a copy of the corresponding file listed on page 342.

    ii.   Please confirm that the unmodified SSR-82 programs operate correctly on the SSR-84 data file. If you do not confirm, please provide programs modified so that they operate correctly on the data files provided in SSR-84.

    iii.   If the file provided in SSR-84 was copied from a "SAFE" file that differs from the actual file used in SSR-82, please explain all modifications made to construct the "SAFE" file.

OCA/USPS-67 Response:

a.   Objection filed September 9, 1996.

b.   Not confirmed. In the files provided in SSR-84, commercially sensitive

information has been deleted.

c.i.   Objection filed September 9, 1996.

c.ii.   Objection filed September 9, 1996.

c.iii.   The "SAFE" files were created by deleting commercially sensitive

information while copying the original files

OCA/USPS-68. Please refer to the TRACS Amtrak estimation programs
overview beginning at page 322 of SSR-85. Please provide the input data files
for the Amtrak estimation on a diskette (or other medium such as CD ROM) in a
format easily accessible by PCs.

OCA/USPS-68 Response:

Objection filed September 9, 1996.

U. S. POSTAL SERVICE RESPONSE TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-69.   This question concerns the IOCS strata definitions. At page 14 of the statistical systems documentation (SSR-90), the strata are defined as follows:

Post offices are stratified by size into ten CAGs, where the measure of size for each office is its total revenue receipts for the previous fiscal year.

More insight into stratification is provided in response to OCA/USPS-31a:

An additional stratum for mail processing offices that were split from CAG C customer service offices was established for variance computation .   .   .   .

An explanation of CAG A/B tally stratitification is presented in response to OCA/USPS-33:

Item F263 is used to separate CAG A/B tallies into three strata: '666666' for the BMC's, '555555' for the group of large offices, and '777777' for the remaining offices in CAG A and B.

In the attachments to the response to OCA/USPS-T5-13, sample information by stratum is reported for CAG A/B as one stratum producing a total of 9 strata instead of the 10 referred to in SSR-90.

a.   Please provide the equivalent of the attachment to the response to OCA/USPS-T5-15 for only CAG A and B offices using the F263 strata definitions. (Instead of "A" or "B", use '555555, '666666,' or '777777.')

b.   Please confirm that according to OCA/USPS-33, an F263 code of '777777' corresponds to one stratum containing CAGs A and B offices, but that SSR-90 indicates that CAG A and CAG B are two different strata. Please clarify the stratum '777777' definition.

c.   According to OCA/USPS-33, an F263 code of '555555' defines a stratum that corresponds to a group of large offices. Please clarify whether this group consists of some CAG A sampling stratum offices, all CAG A offices, or both CAGs A and B offices.

d.   Please confirm that each CAG A or CAG B office/finance number belongs to one of the three "F263" strata. If you do not confirm, please explain what other strata CAG A or B offices could be assigned to.

e.   Which sampling stratum contains offices (or finance numbers) that were not in the sample in FY 1992, but were advanced to CAG B status by FY 1995?

f.   Which sampling stratum contains offices (or finance numbers) that were not in the sample in FY 1992, but were advanced to CAG A status by FY 1995?

g.   Please provide internally consistent definitions of the IOCS strata.

OCA/USPS-69 Response:

a.   In the attachment to the response to OCA/USPS-T5-15, "A" corresponds to '555555' -'666666', and "B" corresponds to '777777'. "A" offices whose names include 'BMC' or 'BMF' are classified as '666666', i.e. obs. # : 45, 167, 173, 217, 236, 241, 246, 360, 430, 447, 521, 574, 614, 630, 709, 716, 814, 844, 889, 894, 968. The remaining "A" are classified as '555555'.

b.   The '777777' stratum consists of all CAG A offices not included in the '555555' - '666666' strata, and all CAG B offices.

c.   The '555555' group consists of some CAG A sampling stratum offices. The offices in this group consist of the same 30 that were included in the FY 1992 sample. The original finance number for nearly each of these 30 offices was split after the Restructuring into 3 finance numbers: the original finance number was retained for the customer service office, and two new ones were created, one for the mail processing facility and one for the air mail facility.

d.   Confirmed.

e. and f.   Offices that were not in the sample in FY 1992 but were advanced to CAG

A or CAG B status by FY 1995 are included in the universe of offices of the '777777'

sampling stratum.

g.   See responses a-f above. Also note that the revenue-based CAG classification

referred to in SSR-90 is applicable to customer service offices. Processing and

Distribution Centers and Facilities, Bulk Mail Centers and Facitlities, and Air Mail

Centers and Facilities are automatically included in CAG A, which IOCS further

stratifies as stated above.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the Rules

of Practice.

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September 13, 1996