

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. MC96--3

SPECIAL SERVICES REFORM, 1996

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-54(c) and (e) AND 56(c))

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-54(c) and (e), and 56(c), filed on August 22, 1996. These responses are filed in accordance with Presiding Officer's Ruling Granting in Part OCA Motion to Compel, Presiding Officer's Ruling No. MC96-3/16, September 26, 1996.

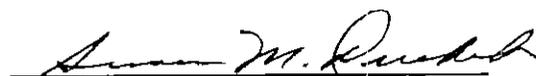
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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OCA/USPS-54. Please refer to the response to OCA/USPS-T5-14. This interrogatory states, "One hundred eighteen (118) offices advanced from CAG C or lower to CAG B or A since the [FY 1993] sample was drawn. Fifty (50) of these offices were in the sample in FY 1993.

- c. Please confirm that the 68 (118-50) CAG C or lower offices that were not in the FY 1993 sample but advanced to "certainty strata" (CAGs A and B) by FY 1995 had no chance of selection for the FY 1995 IOCS sample. If you do not confirm, please list each of the 68 offices along with its sample selection probability for the FY 1995 office sample.
- e. In addition to any "certainty strata" offices that had no chance for selection in the FY 1995 IOCS sample, were there any offices in the noncertainty strata that had no chance for selection in the FY 1995 IOCS office sample? If so, please list these offices, their CAG designations, and the reason for their absence from the sampling frame.

OCA/USPS-54 Response:

- c. Partial response filed September 6, 1996. The attachment lists the 12 offices that had no chance of selection in CAG A or B.
- e. Partial response filed September 6, 1996. The Postal Service cannot locate the original office frame from which the current IOCS panel of offices was selected over 25 years ago. Thus, it is not possible to identify which offices are in the FY 1995 frame, but were not in that original office frame. Those offices *presumably* would have had no chance for selection in the FY 1995 IOCS office sample. Even if the original frame was available, it would be impossible to determine with any accuracy whether a new finance number indicated a new office. The new office might, in reality, be two previous offices that were

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consolidated, or an operational part of an office, where the previous offices had a chance of selection for the IOCS sample.

Because it is not possible to compute the current probabilities of selection, the method of estimation assumes that, at the first stage of selection, within CAGs C through K, the sample of offices in each CAG constitutes an equal probability sample. At the end of FY 1995, when CAG accrued costs became available, all sampled offices were moved into their actual FY 1995 CAGs for dollar weighting. For office where employees were sampled at rates different than the employees in their actual CAG (as shown in the attachment to the response to OCA/USPS-58), the tallies were reweighted to adjust for the difference in employee sampling rates and then combined with other tallies from that CAG. Thus, the tallies for a CAG office are included where their accrued costs are.

Attachment to the response to OCA/USPS-54(c)

Woodland Hills	Ca
Old Saybrook	Ct
Franklin Park	Il
South Bend	In
Wells	Me
Frederick	Md
Little Falls	Mn
Osseo	Mn
Hazelwood	Mo
Jefferson City	Mo
Hebron	Oh
Dyersburg	Tn

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OCA/USPS-56. Please refer to Attachment 1 to the response to OCA/USPS-T5-13. This attachment shows that of the 600 CAG A/B finance numbers, 504 were in the FY 1995 IOCS sample and 96 were not.

- c. Of the finance numbers that were not in the FY 1995 IOCS sample, how many had no chance for selection for FY 1996? For each such finance number, please list the finance number, its CAG, and the reason for its absence from the sample frame.

OCA/USPS-56 Response:

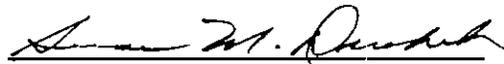
- c. See Attachment. Please note that the 56 offices referenced in the initial response to OCA/USPS-54(c), filed on September 6, 1996, are not included. Please also note that the offices included in the attachment to the response to OCA/USPS-54(c), with the exception of Woodland Hills, CA should be included with the offices in the attachment to this response.

Attachment to the Response to OCA/USPS 56-c

Jonesboro	AR	
Pembroke Pines	FL	
West Nassau GMF	NY	
Sun Valley	CA	
Pueblo	CO	
Daytona Beach	FL	
Schaumburg	IL	
Piscataway	NJ	
Saratoga Springs	NY	
Bethlehem	PA	
Bloomsburg	PA	
Valley Forge	PA	
Grand Prairie	TX	
Logan	UT	
San Antonio AMF	TX	
Norfolk AMF	VA	
Halmar AMF	NY	
Mission DDC	CA	
Southern Marin DDC	CA	
Anne Arundel DDU	MD	
Magothy Bridge DDU	MD	
Seattle DDC-East	WA	
Seattle DDC-South	WA	
Margaret L Sellers PDC	CA	CA
Manasota PDC	FL	
Mid Florida PDC	FL	
South Florida PDC	FL	
North Metro PDC	GA	
Fox Valley PDC	IL	
Irving Park Road PDC	IL	
South Bend	IN	
Monmouth PDC	NJ	
Mid-Hudson PDC	NY	
North Texas PDC	TX	
North Houston PDC	TX	
Busse Surface Hub	IL	
Baltimore Inc Mail PDC	MD	
Northern Hasp	MA	
Milwaukee Priority Annex	WI	
Pacific Area Labor Relations		CA
San Francisco HRSC	CA	
National Postal Museum	DC	
Mid-Florida CSU	FL	

**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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