ORIGINAL

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

Special Services Fees and Classifications)   Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-89)
(November 6, 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 an interrogatory and request for production of

documents.   Instructions included with OCA Interrogatories 1-4 to

the United States Postal Service dated June 19, 1996, are hereby

incorporated by reference.
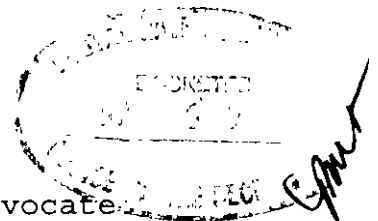

Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

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SHELLEY S. DREIFUSS
Attorney

OCA/USPS-89.   Please refer to the response to OCA/USPS-88.

a.   Library Reference SSR-156 includes two diskettes, each

containing a single file named FMSRTE.DAT. Please explain

the difference between these two files.

b.   Does either of the FMSRTE.DAT files correspond to one of the

data sets named FMSRTE in either SSR-99 or in SSR-156? If

so, please identify the data set (by library reference,

page, and line number) and which of the FMSRTE.DAT files it

corresponds to. If not, please explain exactly which data

was used to produce the FMSRTE.DAT files.

c.   The second SAS program of SSR-99 required only two input

data sets (files ROUTES.LDLSMN.PS754D01.STATB.VOLUME00x and

FMS.DATA) to produce tables of average cost per square foot

figures. Tables of average cost per square foot figures are

produced in SSR-156 using the input files of SSR-99 plus

three additional files (INSTMAST.FY9603.TXT,

POBOX.SVYSTEP2.JAN30.DAT, and H30005.POBOX.ADDRFMS.DATA).

   i.   Please explain why the additional files were necessary

for SSR-156.

   ii.   Please describe the contents of each of the files used

in SSR-156 and define each variable used. For example,

what is the difference between CAG, FMSCAG, and ACAG?

d. Please refer to the tables of cost per square foot by

delivery group at page 29 of SSR-156 and at page 31 of

SSR-99. Please explain why these figures do not agree for

delivery groups 1C, 2, and 3. Please identify which of the

two tables of cost per square foot is correct.

e. Please compare the tables at page 29 of SSR-156 with the

table at page 31 of SSR-99. In SSR-156, the numbers of

observations for groups 1C, 2, and 3 are 5854, 14959, and

4468, respectively. In SSR-99, the corresponding figures

are 5853, 14989, and 4438. Please explain the reason for

this discrepancy.

f. Please refer to the attached tabulations of the larger of

the two FMSRTE.DAT files included with SSR-156.

i. Please explain why the number of observations by CAG

for FMSRTE.DAT differs from that shown at pages 22-24

of SSR-156 for CAGs G-L.

ii. Please explain why the number of observations by

delivery group for FMSRTE.DAT differs from that shown

at page 29 of SSR-156 and from that shown at page 31 of

SSR-99.

g. Please refer to pages 30 and 32 of SSR-156. The table on

page 30 is titled "COST PER SQFT BY DELIVERY GROUP USING ALL

FMS RECORDS." The table on page 32 is titled "COST PER SQFT

BY DELIVERY GROUP USING ESTIMATED RECORDS."

i.   Please explain the difference between these two

measures of cost per square foot.

ii. Please explain the difference between "FMS RECORDS" and

"ESTIMATED RECORDS."

iii. The cost per square foot for group 1A is 18.8322 using

FMS records and 21.7575 using estimated records. Which

estimate is correct? Are these two cost figures meant

to be used for different purposes? If so, please

explain. If not, then please explain why they differ.

iv. Does your response to subpart iii, above, apply to

similar cost per square foot discrepancies for groups

1B, 1C, 2, and 3? If not, please explain the reason

for discrepancies in these other delivery groups.

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NOTE: Copyright (c) 1989-1993 by SAS Institute Inc., Cary, NC, USA.
NOTE: SAS (r) Proprietary Software Release 6.10  TS019
      Licensed to POSTAL RATE COMMISSION, Site 0009866002.



NOTE: The SAS System for Microsoft Windows, Release 6.10 Limited Production
1     filename in1 't:\mc96-3\libref\ssr-156\disk1\fmsrte.dat';
2     data disk1;
3             infile in1;
4             input cag $ 1   delgrp  $3-4    costsqft 8-15;

NOTE: The infile IN1 is:
      FILENAME=t:\mc96-3\libref\ssr-156\disk1\fmsrte.dat,
      RECFM=V,LRECL=256

NOTE: 25692 records were read from the infile IN1.
      The minimum record length was 15.
      The maximum record length was 15.
NOTE: The data set WORK.DISK1 has 25692 observations and 3 variables.
NOTE: The DATA statement used 7.79 seconds.


5     proc means data=disk1;
6             class cag;
7             var costsqft;
8             output out=disk1m mean=;

NOTE: The data set WORK.DISK1M has 15 observations and 4 variables.
NOTE: The PROCEDURE MEANS used 2.25 seconds.


9     proc means data=disk1;
10            class delgrp;
11            var costsqft;
12            output out=disk1m mean=;
13    run;

NOTE: The data set WORK.DISK1M has 7 observations and 4 variables.
NOTE: The PROCEDURE MEANS used 1.92 seconds.
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Analysis Variable : COSTSQFT

CAG	N Obs	N	Mean	Std Dev	Minimum	Maximum
A	1148	1148	9.1283281	8.0532141	0.0024000	42.0312000
B	673	673	9.0698978	7.3087888	0.0046000	40.8187000
C	1075	1075	9.2900011	7.0639571	0.0417000	36.8938000
D	478	478	8.5359510	6.9629967	0.0182000	40.0398000
E	788	788	7.6487110	5.6757703	0.6418000	30.2521000
F	983	983	7.1309731	4.9104418	1.0243000	27.0000000
G	2232	2232	6.3480236	3.6149872	0.9195000	18.8267000
H	3330	3330	6.0409474	3.0708928	1.3282000	18.5393000
J	4556	4556	5.7517561	2.7312186	1.2633000	16.7977000
K	8875	8875	5.7541049	2.8566395	1.1342000	18.1818000
L	1548	1548	5.5643677	3.0595709	0.6667000	18.5185000
M	1	1	4.1500000	.	4.1500000	4.1500000
S	1	1	10.2100000	.	10.2100000	10.2100000
W	3	3	6.9303333	5.7189624	1.5802000	12.9578000
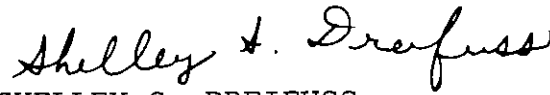
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Analysis Variable : COSTSQFT

DELGRP	N Obs	N	Mean	Std Dev	Minimum	Maximum
1A	25	25	18.8322440	12.6951011	1.2585000	42.0312000
1B	143	143	15.5100678	9.8252027	0.0051000	40.8187000
1C	5830	5830	7.3935275	6.0268073	0.0024000	41.9595000
2	14986	14986	5.7545453	2.9465303	0.3333000	32.6033000
3	4397	4397	6.7366738	3.4801157	0.7674000	28.0567000
NA	311	311	7.2493990	5.6447102	0.0033000	37.5000000

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 3.B(3) of the special rules of practice.

Shelley S. Dreifuss

SHELLEY S. DREIFUSS
Attorney

Washington, D.C.   20268-0002
November 6, 1996