

BEFORE THE
POSTAL REGULATORY COMMISSION

PERIODIC REPORTING
(PROPOSAL ONE)

Docket No. PI2020-1

**Motion of Public Representative For Information
(October 7, 2019)**

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the City Carrier Cost System (CCCS), and by implication, the Rural Carrier Cost System (RCCS). The proposed questions seek information that will allow participants to provide comments that are more responsive to the Commission's Public Inquiry on the Methodology to Estimate the Value of the Postal Service Letter and Mailbox Monopolies.¹ The specific purpose of the proposed questions is to learn the sample properties of a file that merges the digital CCCS sample with the non-digital CCCS sample where the value of the variable "testid" is same in both files.

Proposed Questions

Please refer to Docket No. ACR2018, USPS-FY18-NP22 - City Carrier Cost System (CCCS) (Nonpublic Version). Please confirm the following calculations made by comparing the files entitled "cccs_z_acrfy18_digital_final.sas7bdat," ("digital file") and "cccs_z_acrfy18_final.sas7bdat" ("manual file").

1. Please confirm there are approximately 1,987 testid values common to both files.
2. Please confirm there are approximately 28,865 testids found only in the digital file.
3. Please confirm there are approximately 6,339 testids found only in the manual file.

¹ See, Docket No. PI2020-1, Public Inquiry on the Methodology to Estimate the Value of the Postal Service Letter and Mailbox Monopolies, Order No. 5260, Notice And Order Providing An Opportunity To Comment, Issued October 1, 2019.

4. Please confirm that when a testid value is the same in both files, that testid contains data from the same routeday. Please explain if you do not confirm.
5. Please discuss whether testid-level mail volumes with the same values in the digital and manual files can multiplied by their respective second-stage weighting factors to yield representative estimates of total, quarterly, route-level mail volumes, by observation.²
6. If you do not confirm, please explain:
 - a. whether it would be possible to calculate alternate second-stage weighting factors that would yield representative estimates of total, quarterly, route-level mail volumes by observation.
 - b. the methodology and data one would use to calculate these alternate first-stage weighting factors.
 - c. whether, and if so how, the second stage weighting factor would need to be redefined.
7. Please explain whether the data from which the digital and manual CCCS datasets are constructed contain 5-digit ZIP Code identifiers, and if not, whether the Postal Service can readily add 5-digit ZIP Code identifiers to the manual and digital CCCS datasets.

Respectfully Submitted,

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² See, Docket No. ACR2018, USPS-FY18-NP22 - City Carrier Cost System (CCCS) (Nonpublic Version), file entitled "USPS-FY18_NP22_CCCS_Preface.pdf", for the definitions of the second-stage weighting factors for the manual and digital samples.