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

FEB 29 4 34 PM 'CO

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAYMAN TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T9-18-19)

The United States Postal Service hereby provides the responses of witness Tayman to the following interrogatories of the Office of the Consumer Advocate:

OCA/USPS-T9-18-19, filed on February 15, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2997 Fax –5402 February 29, 2000

OCA/USPS-T9-18. In witness Porras' testimony in Docket No. R97-1, he stated, "...[T]he Postal Service's systems are upgraded to deal with year 2000 issues. This increases test year costs by \$298.00 million ..." (Tr. 34/18585). In Docket No. R97-1, exhibit USPS-RT-11E indicates that cost segment 16, component 174's costs for the FY98 Test Year increased by \$298 million for the Year 2000 Software Program (Tr. 34/18598).

- (a) The following refers to your response to DMA/USPS-T9-13, filed February 11, 2000. Is there a difference between the term "Y2K" or "year 2000 computer transition" and the Year 2000 Software Program? If so, please explain and provide the segment(s), component(s) and account numbers charged with the Y2K expenses for FY98, FY99 and FY00.
- (b) If not, please reconcile your response indicating FY98 expenses of \$88.6 million and FY99 expenses of \$267.0 million with witness Porras' rebuttal testimony, in Docket No. R97-1, stating that the FY98 expenses would increase by an additional \$298 million for Year 2000 software (Tr.35/18598).
- (c) For the FY98 Test Year in Docket No. R97-1, was the Year 2000 Software Program considered one of the "Headquarters Administered Programs or Corporate-wide Activities"?
- (d) For FY98 actuals, please indicate the account number(s), segment(s), component(s) and the amounts charged with the Year 2000 software program expenses.
- (e) What was the Postal Service's FY98 total budgeted amount for the Year 2000 software program?
- (f) For FY99 actuals, please indicate the account number(s), segment(s), component(s) and the amounts charged with the Year 2000 software program expenses.
- (g) What was the Postal Service's FY99 total budgeted amount for the Year 2000 software program?
- (h) What was the Postal Service's FY99 budgeted amount for the Year 2000 software program for segment 16, component 174?
- (i) Are Year 2000 software program expenses continuing to be incurred in FY00? If so, please provide: (1) the amount spent year-to-date for FY00, (2) the segments and components charged with the expenses, (3) when the Year 2000 software program expenses will cease to be incurred, and (4) explain why costs are continuing to be incurred for this program.
- (j) If program expenses are continuing to be incurred in FY00 for the Year 2000 software program, please provide the FY00 total amount budgeted for this program.

OCA/USPS-T9-18. continued

RESPONSE:

- (a) There is no difference between the term "Y2K" or "year 2000 computer transition" and the Year 2000 Software Program.
- (b) The \$298 million referred to was the estimate provided to Mr. Porras by the program manager for Y2K at that time. As evident from my response to DMA/USPS-T9-13 most of this expense occurred in FY99. Please note that the amounts specified in DMA/USPS-T9-13 represent non-personnel expense only, other than depreciation.
- (c) Year 2000 Software Program is considered a Headquarters Administered Program.
- (d) Please see attachment OCA/USPS-T9-18 (d) to this response. The account code for each account number can be found in Chapter 2 of LR-I-127.
 Please note that the attachment includes salaries and benefit costs as well as depreciation charged as Y2K expense. The values provided in my response to DMA/USPS-T9-13 were for non-personnel only, other than depreciation.
- (e) The FY98 budgeted amount for Y2K was \$150 million.
- (f) Please see attachment OCA/USPS-T9-18 (f) (I) to this response. The account code for each account number can be found in Chapter 2 of LR-I-127. Please note that the attachment includes salaries and benefit costs as well as depreciation charged as Y2K expense. The values provided in my

OCA/USPS-T9-18. continued

response to DMA/USPS-T9-13 were for non-personnel only, other than depreciation.

- (g) The FY99 budgeted amount for the Y2K was \$291 million.
- (h) The Postal Service budget is not developed by segment and component.
- (i) Y2k expenses are being incurred in FY00.
 - (1) Through accounting period 6 \$51 million has been expensed.
 - (2) Please see attachment OCA/USPS-T9-18 (f) (I) to this response.
 The account code for each account number can be found in
 Chapter 2 of LR-I-127.
 - (3) Y2K expenses should be completed in FY2000.
 - (4) Costs are being incurred to finalize all required programming changes.
- (j) The FY00 budgeted amount for the Y2K is \$50 million.

YEAR 2000 INITIATIVE Expense Summary FY 1998

	Account	F	Y 1998
51101181			311,619
51101183 51103181			127,739 3,090
51202181			21,680
51202183 51211181			7,321
51211183			8,317 3,108
51212181			15,539
51212183 51214181			6,835
51214183			220 56
51215181			555
51215183 51216181			104 12
51217181			4,547
51217183			2,183
51218181 51218183			196 45
51219181			321
51219183			58
51221181 51221183			5,076 1,703
51222181			2,084
51222183 51226181			866
51226183			3,520 1,2 8 3
51227181			210
51227183			50
51239183 51243183			10,000 8,032
51247183			7,013
51401101			4,897
51401103 51401104			22,444 1,949
51401112			103
51401123			13,923
51401125 51401127			865 2,908
51401130			10,204
51401144			1,531
51401147 51401148			356 3,043
51401172	•		8,629
51401181 51401182			1,652 183,078
51401183			24,270
51403101			577
51403103 51403130			1,999 754
51403172			28,111
51403182			40,116
51403183 51404182			19,702 1,608
51404183			4,475
51411183			13,200
51413103 51413127			2,064 2,877
51413130			2,303
51413182 51413183			6,096
52101000			3,422 9,366
52104000			1,742
52105000 52105998			35,018
52111000			12,959 394,411
52171000			11,296,558
52171998 52172000			17,583 2,812
52178000			599
52179000			653,420
52270000 52321000			14,950 851,622
52322000			252,736
52325000			50,473
52325998 52331000			2,209 5,001,976
52331998			20,996
52332000			1,156,789
52334000 52339000			609,282 181,532
52342000			2,394,120
52359000			42,123,994
52361000 52363000		•	9,314 48,690
			,

Attachment to Response to OCA/USPS-T9-18 (d)

52367000	4.000
52411000	4,000
52418000	23,750,921
52419000	509
	7,165
52419998	19,349
52431000	728
52435000	442
52436000	5,407
52438000	255
52439000	13,770
52453000	240
52454000	19
54101000	137,332
54146000	125
54165000	5,820
54165998	12,118
54231998	138
54233000	3,195
54242000	86,924
54330000	1,286,423
54406000	1,300
54406998	17.519
54411000	30,391
54411998	17,750
54620000	2,675,424
56315000	896
56605000	42.765
56605998	19.397
56617000	21,247
56621000	69
Grand Total	94,265,329
	04,200,023

YEAR 2000 INITIATIVE Expense Summary through AP 6, FY 2000

Acco	unt <u>FY 1999</u>	FY 2000
51101181	3,660,121	1,261,657
51101183 51103181	905,587	279,993
51103183	4,330 1,744	3,195
51111183	2,353	
51112183	2,631	
51141183 51142183	74,037 28,868	
51143183	7,704	
51145183	9,254	
51202181 51202183	258,429	90,656
51211181	66,131 96,024	15,0 8 6 35,0 7 7
51211183	15,703	5,963
51212181	181,890	60,255
51212183 51214181	46,452	13,230
51214183	1,433 5,797	404
51215181	12,880	6,285
51215183	12,239	3,634
51216181 51217101	1 41	
51217103	277	69 203
51217104	15	15
51217113	7	
51217123 51217125	15	31
51217125	46 89	15 49
51217130	5,402	2,875
51217172	5	
51217181	53,134	18,424
51217182 51217183	992 16,228	5,382
51218104	31	3,362
51218130	282	159
51218181	1,336	361
51218183 51219101	4,483	62
51219130	547	115 313
51219181	7,353	3,352
51219183	7,639	1,995
51221101 51221103	60 172	287
51221104	172	31
51221113	31	
51221123	66	131
51221125 51221130	4,412	62 2,463
51221172	20	2,403
51221181	56,284	20,921
51221183	9,434	3,740
51222181 51222183	23,891 6,509	7,941 1,780
51224183	185	.,,
51226181	40,225	14,936
51226183	6,962	2,757
51227181 51227183	5,674 5,558	2,780 1,720
51239182	10,273	.,,20
51241182	1,892	
51242182 51242183	71 4 751	
51242183	28,491	
51244182	10,534	
51244183	10,877	
51247182 51247183	19,815 10,089	
51248182	21,709	
51248183	13,773	
51313104	1,000	1,000
51313113 51313183	500 2,650	25,500
51317181	2,030	25,500 109
51317183	4,106	2,066
51321101		54
51321103 51321125	•	572 1,000
51321125		1,000 54
51321130	1,000	2,235
51321181	1,000	1,072
51321183 51322101	12,868 1,376	32,90B 4,600
51322101	13,561	4,600 13,284
51322123	1,057	2,114

Attachment to Response to OCA/USPS-T9-18 (f) (i)

51322125	2 234	
51322127	2,234 4,739	3,180
51322130	315,707	195,549
51322172	321	130,543
51322181	31,067	18,809
51322183	48,189	35,790
51323000	3,423	,
51325000	1,910	
51325103	3,662	
51325130	22,453	
51325181	4,502	
51327101	973	
51327125	958	
51327127	1,388	
51327130	33,414	
51327181	1,411	
51327183	1,576	
51401101	14,743	12,706
51401103	26,986	11,798
51401104	40,297	5,042
51401107	2,619	
51401112	312	
51401113	24,234	4,697
51401121	408	200
51401123	4,191	802
51401125	2,417	921
51401127	10,907 418,544	3,131
51401130 51401141	61,265	126,029 297
51401144	10,327	1,363
51401144	6,673	1,303
51401156	0,513	28,774
51401157	9,374	20,504
51401171	1,322	20,004
51401172	64,917	17,044
51401181	142,429	39,076
51401182	91,072	9,630
51401183	205,638	107,973
51403101	4,284	6,525
51403103	15,388	1,507
51403104	1,203	1,00
51403130	44,152	3,575
51403141	7,263	•
51403172	29,129	4,896
51403182	29,296	
51403183	3,943	3,839
51411103	125	
51411130	3,755	1,591
51411141	6,243	
51411144	600	
51411182	335	
51411183	5,052	
51413101	1,972	100
51413103	144	9,487
51413104	6,484	684
51413113	749	1,248
51413123	482	
51413127	1,007	20.040
51413130	58,853	20,646
51413141	32,505	315
51413148	1,999	
51413172 51413181	18 1,460	3,296
51413182	1,068	3,230
51413183	(1,999)	548
52101000	381,182	8,038
52102546	741	-,
52103000		6,650
52105000	306,850	
52105998	11,298	1,806
52109000	67,425	1,501
52111000	392,833	43,014
52120000	5,603	
52150000	90	753
52151000	19	-
52155000	5,898	
52170000	2,448	1,659
52171000	3,308,308	528,728
52171998	61,012	1,965
52172000	78,019	3,862
52173000	168,023	1,950
52174000	2 630	
52174998 52179000	2,639 545,467	23,718
52179000 52230000	545,467 1, <i>2</i> 72	43,110
52270000	0	(0)
52313000		
52313000 52321000	30,695	82,284
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52232000			
5232598B 6.916 52327000 114.766 52327000 210.326 52331000 111.761 201 3.842.908 52331000 117.61 201 3.842.908 52331000 12.73.555 7.810.537 52333000 37.76.517 7.56.256 52334000 87.76.79 7.56.256 52334000 89.857 290.108 52334000 89.89.57 290.108 52335000 24.58.38 10.120 52359000 95.877.165 6.555.116 52359000 95.877.165 6.555.116 52359000 10.009 2.054 52369000 10.009 2.054 52369000 10.009 2.054 5236998 2.585 2.429 52367000 2.1 1.21 52416000 10.009 2.064 52367000 3.009 2.04 52416000 1.577 14.093 52416000 3.330 16 52416000		52,400	
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52336000 598,567 290,018 52336000 154,232 152,335000 245,838 101,230 52342000 4044,391 467,831 101,230 52342000 4044,391 467,818 52342000 315 3,335 53,335 5235998 315 3,335 5235998 2,664 5235998 2,664 5235998 2,664 52367000 21 24267000 21 5247000 40,121,918 11,021,235 52416000 1,577 14,093 52416000 1,577 14,093 52419000 85,229 70,871 52419988 37,902 77,741 52419988 37,902 77,741 5243000 3,330 166 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 5243000 3,529 52			4,507,726
52338000 890.219 154.292 52339000 245.638 10.230 52342000 4.044.391 467.581 52359000 95.877.165 6.555.116 52359000 10.009 2.064 52363000 10.009 2.064 52363000 2.1 1.181 52363000 2.1 1.1021.235 52411000 40,121.918 11.021.235 52411000 15.77 14.093 52419000 85.229 70.871 52419000 85.229 70.871 52419000 3.330 166 52439000 58.206 37.702 52439000 55.004 95 52439000 15.542 5 52439000 15.447 6,196 52439000 15.447 6,196 52445000 13.16 898 52445000 1.316 898 52455000 2.5 5 52610000 2.5 5			
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52342000 4,044,391 467,881 52359000 95,871,185 6,555,118 52359000 10,009 2,064 52363000 10,009 2,064 52363000 10,009 2,064 52363000 2,585 2,429 52367000 21 11021,235 52411000 40,121,918 11,021,235 52419000 85,229 70,871 52419000 3,330 166 5243000 33,330 166 52435000 36,229 37,792 52435000 33,004 36,29 52435000 35,004 36,29 52435000 35,004 36,29 52435000 15,547 6,196 52435000 15,547 6,196 52435000 15,547 6,196 52435000 15,547 6,196 52435000 15,547 6,196 52435000 1,316 898 52435000 1,316 898			
6235000 95,877,165 6,555,116 62350906 315 3335 52362000 10,009 2,064 5236398 2,585 2,429 52367000 21 2 52411000 40,121,918 11,021,235 52418000 1,577 14,093 52419000 85,229 70,871 52439000 3330 166 52432000 536,206 37,702 52438000 35,004 35 52438000 35,004 35 52438000 35,004 35 52435000 15,447 6,196 524438000 35,004 35 524438000 35,004 35 524438000 15,447 6,196 524438000 13,16 898 524438000 13,16 898 52453000 15,447 6,196 52453000 15,447 6,196 52445300 13,31 1,321 424500		•	
52359998 315 3.335 52362000 11,181 52362000 10,009 2,064 52363908 2,585 2,429 52367000 21 10,012 52411000 40,121,918 11,021,235 52419000 55,229 70,871 52419998 37,902 7,741 52431000 33,330 166 52432000 58,229 37,627 52435000 33,629 37,722 52435000 35,004 39,688 52438000 35,004 39,688 52435000 15,552 52,523 52435000 15,547 6,196 52435000 15,547 6,196 52435000 15,547 6,196 52435000 15,547 6,196 52435000 15,547 6,196 52435000 1,316 896 52435000 1,316 896 52435000 1,321 1,420 52435000 <			
52322000 10,009 2,064 52363000 10,009 2,064 52363988 2,585 2,429 52411000 40,121,918 11,021,235 52411000 1,577 14,093 52419000 85,229 70,871 52419900 3,330 166 52432000 538,205 37,702 52435000 33,300 166 52432000 530,004 95 52435000 35,004 95 52435000 35,004 95 52435000 35,004 95 52435000 15,447 6,196 52435000 15,447 6,196 52455000 13,16 898 52455000 1,316 898 52455000 25 5 52801000 24,000 5 52455000 25 5 52801000 2,000 5 5410300 3,02,528 107,384 5410300 3,000 </td <td></td> <td></td> <td></td>			
10,009 2,084 2,285 2,429 2,287 2,2429 2,287 2,		315	
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56930000 (8.107)		3,776	4,254
(0,107)			177
Grand Total 287,702,057 50,960,374			(8,107)
	Grand Total	287,702,057	50,960,374

OCA/USPS-T9-19. The following interrogatory refers to USPS-LR-I-127, pages 218 through 227.

- (a) Please confirm that the following quote appears on page 218. "This Workbook calculates the amounts by component of changes in Headquarters Administered Programs and Corporate-wide Activities for any intermediate estimate years and for the Test Year."
- (b) Please confirm that on page 227, of the RF Summary, the FY99 budget for segment 16, component 174, ADP S&S is \$531,529,740. If you are unable to confirm, please explain.
- (c) Please provide the FY00 budgeted amount, for segment 16, component 174, ADP S&S, for the Year 2000 software program.
- (d) Please confirm that on page 227, of USPS-LR-I-127, segment 16, component 174, ADP S&S indicates that FY99 budgeted costs increase over FY98 actual costs by \$61,593,245. If you are unable to confirm, please explain.
- (e) Please confirm that on page 227, of USPS-LR-I-127, segment 16, component 174, ADP S&S indicates the FY00 budgeted costs are expected to decrease from the FY99 budgeted amount, by \$40,805,050. If you are unable to confirm, please explain.
- (f) Please explain what comprises the \$40,805,050 cost decrease in segment 16, component 174.
- (g) Please confirm that on page 227, of USPS-LR-I-127, the FY01 costs for ADP S&S for segment 16, component 174 are expected to increase by \$27,203,367.
- (h) Please explain what comprises the cost increase of \$27,203,367 in segment 16, component 174.
- (i) Please confirm that the **net** decline from FY98 expenses shown in the RF Summary on page 227, of USPS-LR-I-127, for ADP S&S in FY00 and FY01 for segment 16, component 174 is \$13,601,683 (-\$40,805,050 + \$27,203,367).

RESPONSE:

- (a) Confirmed.
- (b) Confirmed.
- (c) The Postal Service budget is not developed by segment and component.

Please note that as described on page 228 of LR-I-127, budgeted amounts

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by line number for the estimated years are allocated by account number based on FY98 actual and cross walked to cost component. It should also be pointed out that the term "Budget" for FY 2000 and FY 2001 represents an estimate since budgets had not been developed when these estimates were made.

- (d) Confirmed.
- (e) Confirmed.
- (f) The \$40,805,050 cost decrease in segment 16, component 174 represents the estimated prorated share of the net decline in Headquarters Programs and Corporatewide Activities expenses for lines 31 and 34 (supplies and services) in FY 2000.
- (g) Confirmed.
- (h) The \$27,203,367 cost increase in segment 16, component 174 represents the estimated net increase in these expenses in FY 2001.
- (i) Confirmed.

DECLARATION

I, William P. Tayman, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

William 1: The

Dated: 🙏 २५ २००८

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.

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 February 29, 2000