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RULING NO. R2000-1/130  
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UNITED STATES OF AMERICA  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

PRESIDING OFFICER'S RULING  
GRANTING WAIVERS, IN PART, AND CLARIFYING EVIDENTIARY STATUS OF  
CATEGORY 2 LIBRARY REFERENCES

(March 14, 2000)

Subsequent to the last omnibus rate proceeding, the Commission proposed and, after reviewing comments submitted by interested persons, ultimately adopted revisions to Rule 31(b), governing the submission and role of library references in Commission proceedings. 39 C.F.R. § 3001.31(b).<sup>1</sup> The current proceeding is the first to be initiated by the Postal Service since revised Rule 31(b) became effective. Two issues concerning library references are ripe for decision, namely, the Postal Service's requests for limited waiver of the rule, and the evidentiary status of Category 2 Library References. Each is addressed in turn.

1. THE REQUESTS FOR WAIVER

a. *The Postal Service's Position.* Concurrently with submitting its request for a Recommended Decision, the Postal Service filed a notice identifying the library references included in its filing.<sup>2</sup> In addition, the Postal Service filed separate motions requesting waiver of the Commission's rules concerning Category 1 (Reporting

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<sup>1</sup> See Revisions to Library Reference Rule, Docket No. RM98-2, Order Nos. 1219 (August 27, 1998), 1223 (December 17, 1998), 1263 (September 23, 1999), and 1273 (November 24, 1999).

<sup>2</sup> See Notice of Filing of Master List of Library References, and Notices for LR-1-152 and LR-1-153 (January 12, 2000). The Postal Service filed a separate notice concerning Category 4 Library References. See Notice of the United States Postal Service with Respect to Category 4 Library References.

Systems Material), Category 2 (Witness Foundational Material), Category 3 (Reference Material), and Category 5 (Disassociated Material) Library References.<sup>3</sup>

The Postal Service designated 61 Category 1 Library References, consisting of materials relating to its statistical cost and revenue reporting systems, *e.g.*, FY 98 Cost and Revenue Analysis, In-Office Cost System documentation, Revenue, Pieces, and Weight System reports, and FY 98 billing determinants. For Category 2, the Postal Service identified 85 Library References, consisting of foundational material relating to the testimony of specific witnesses, *e.g.*, base year and roll forward input data, various cost studies concerning weight, shape, transportation and processing, and electronic workpapers. The Postal Service filed six Category 3 Library References, consisting of reference material, *e.g.*, the FY 98 Household Diary Study, and domestic mail volume, revenue, and rate histories. Lastly, the Postal Service filed 20 Category 5 Library References, Disassociated Materials, consisting of alternate cost data and models using Commission-approved methodologies.

The Postal Service's motions share a common format and request for relief. First, in each motion, the Postal Service broadly addresses the purposes of the revised Rule as well as the characteristics of the materials submitted which warrant their classification as a Category 1, 2, 3, or 5 Library Reference, respectively.<sup>4</sup> Second, the Postal Service generally discusses selective requirements of the Rule 31(b)(2)(iv) without reference to particular subparts. For example, the Postal Service contends: (a)

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<sup>3</sup> See Motion of the United States Postal Service Requesting Waiver of the New Commission Rules with Respect to Category 1 Library References ("Motion re Category 1"); Motion of the United States Postal Service Requesting Waiver of the New Commission Rules with Respect to Category 2 Library References ("Motion re Category 2"); Motion of the United States Postal Service Requesting Waiver of the New Commission Rules with Respect to Category 3 Library References ("Motion re Category 3"); and Notice of the United States Postal Service Concerning Provision of Information Pursuant to Commission Rule 54(a)(1), and Motion Requesting Waiver of the New Commission Rules with Respect to Category 5 Library References ("Motion re Category 5").

<sup>4</sup> See Motion re Category 1 at 6-7; and Motion re Category 2 at 8; Motion re Category 3 at 2-3. and Motion re Category 5 at 4-5.

that separate notice for each library reference is unnecessary,<sup>5</sup> (b) that there should be no confusion concerning how the library references relate to its direct case,<sup>6</sup> (c) that the persons responsible for the library references are identified or that the materials do not lend themselves to such identification,<sup>7</sup> and (d) that generally, electronic versions have been provided, e.g., to the extent “possible and appropriate.”<sup>8</sup> Third, in lieu of citing specific subparts to which the waiver would apply, the Postal Service requests a blanket waiver “to the extent that it could be argued that its filing does not actually or substantially comply with all of the requirements of Rule 31(b)(2).”<sup>9</sup>

b. *The OCA Response.* The Office of Consumer Advocate (“OCA”) contends that the Postal Service did not sufficiently comply with the Rule.<sup>10</sup> In particular, the OCA faults the Postal Service for: failing to note the presence (or absence) of survey results;<sup>11</sup> failing to identify, to the extent practicable, testimony and exhibits to which the library references relate;<sup>12</sup> failing to identify, to the extent practicable, the portions expected to be entered in the record;<sup>13</sup> and the failure to specify why electronic versions of certain library references were not made available.<sup>14</sup> The OCA urges the

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<sup>5</sup> See, e.g., Motion re Category 1 at 6; Motion re Category 2 at 8; Motion re Category 3 at 2; and Motion re Category 5 at 6.

<sup>6</sup> See, e.g., Motion re Category 1 at 8-9; Motion re Category 2 at 9; Motion re Category 3 at 3; and Motion re Category 5 at 6.

<sup>7</sup> See, e.g., Motion re Category 1 at 7; Motion re Category 2 at 1-7; and Motion re Category 5 at 6.

<sup>8</sup> Motion re Category 1 at 8. See also Motion re Category 2 at 10; Motion re Category 3 at 3; and Motion re Category 5 at 6.

<sup>9</sup> See Motion re Category 1 at 6; Motion re Category 2 at 7-8; Motion re Category 3 at 1-2; and Motion re Category 5 at 4.

<sup>10</sup> Office of Consumer Advocate Response to Motions of United States Postal Service Requesting Waiver of New Commission Rules with Respect to Categories 1, 2, 3, and 5 Library References (“OCA Response”).

<sup>11</sup> OCA Response at 4 concerning Rule 31(b)(2)(iv)(B).

<sup>12</sup> *Id.* at 4-5 concerning Rule 31(b)(2)(iv)(E).

<sup>13</sup> *Id.* at 5-6 concerning Rule 31(b)(2)(iv)(H).

<sup>14</sup> *Id.* at 6-8 concerning Rule 31(b)(2)(vii).

Commission to deny the requests for waiver pending receipt of certain additional information related to the forgoing issues.<sup>15</sup>

C. *Ruling.* The Postal Service's requests for waiver are granted, except, as discussed below, that it is directed to comply with Rule 31(b)(2)(vii). This is the first proceeding under revised Rule 31(b)(2), and the Postal Service appears to have made a reasonable and good faith effort to comply with the requirements of the rule. The Postal Service has provided joint notices of the library references submitted simultaneously with its request for a Recommended Decision. Under the circumstances, a separate notice need not be filed for each library reference. This said, however, the Postal Service's blanket requests for waiver are somewhat overreaching. This is not to say that there is no place for a blanket request, but simply that a waiver request should, to a greater degree, identify the specific provisions of Rule 31(b)(2) for which a waiver is sought.

The Postal Service's requests for waiver appear directed at the following principal provisions of revised Rule 31(b)(2)(iv):

- (A) Materials Designated as Library References. In its motions, the Postal Service adequately explains why the materials are being designated as library references.
- (B) Identifying the Appropriate Category. In both its master list and in each motion, the Postal Service identifies the library reference category and provides a descriptive title for each reference. For purposes of this proceeding, the Postal Service's filings are sufficient. A waiver is granted as to the language in Subpart (B) that the presence of survey results is to be noted. This issue still may be addressed, if desired, through discovery.
- (C) Relationship to Participant's Case. See the discussion under subpart (F) below.
- (D) Identifying Authors. The Postal Service endeavors to comply with this subpart and, for purposes of this proceeding, its explanations are deemed

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<sup>15</sup> *Id.* at 8-9.

sufficient. In particular, it has done a commendable job with respect to Category 2.

- (E) Identifying the Interrelationship to Testimony and Exhibits. See the discussion under subpart (F) below.
- (F) Identifying Other Library References or Testimony Relied Upon. Generally, subparts (C), (E), and (F) are designed to serve as a limited “road map,” identifying interrelationships among the various facets of the Postal Service’s direct case. The Postal Service’s response to the requirements of these subparts is mixed. For example, the Postal Service posits that “past experience provides no reason to question the ability of parties to understand ... how the contents of Category 1 references relate to the rest of the case.”<sup>16</sup> While this may be true, a more explicit, if generalized, indication of the witnesses relying on such references would be useful and consistent with the Rule. Postal Service witnesses, however, do identify Category 2 references relied upon in their testimony. This approach is acceptable. Given the types of materials submitted as Category 3 and 5 Library References, there is, generally, less of a need to identify any linkage to the Postal Service’s direct case. Exceptions, however, may exist, *e.g.*, a witness’s reliance on materials such as the Household Diary Study should be noted. In that regard, the Postal Service does identify those witnesses who utilize certain Category 3 references. On balance, recognizing that this is the first rate proceeding under the revised rule, the Postal Service has attempted to satisfy the requirements of these subparts, a waiver is granted to the extent the Postal Service fails to meet these requirements. If participants have any lingering concerns about the interrelationship among library references or to the testimony, they may be explored through discovery.
- (G) Updates or Revisions. This subpart is not applicable to those library references filed initially by the Postal Service.
- (H) Materials Expected to be Entered into the Record. This subpart provides that, to the extent feasible, the filing participant identify the reference materials it expects to enter into the record and the expected sponsor of such material. The OCA notes that the Postal Service failed to address this subpart. Under the circumstances, *i.e.*, the first proceeding under the Rule and the treatment of Category 2 references discussed below, a waiver of this subpart is granted. The “extent feasible” phrase notwithstanding, in the future the Postal Service should endeavor to respond to this subpart more

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<sup>16</sup> Motion re Category 1 at 8.

directly or explain its inability to do so. The second part of this Ruling, dealing with Category 2 references, may provide a guide to help identify references that ought to be sponsored and offered as evidence.

Rule 31(b)(2)(vii) requires submission of an electronic version, "absent a showing of why [it] cannot be supplied or should not be required to be supplied." The Postal Service's response to this subpart is inadequate. For example, the Postal Service's general statement that it has and will continue to make available electronic versions of Category 1 references is qualified by the phrase "to the extent possible and appropriate."<sup>17</sup> It also indicates that the vast majority of Category 2 references include an electronic version.<sup>18</sup> As the OCA notes, the Postal Service's explanations fall short of compliance with this subpart since, in those instances in which no electronic version has been filed, the Postal Service fails to indicate either that it could not or should not be supplied. OCA's suggestion that the Postal Service respond more fully to this subpart is not unreasonable. Therefore, in those instances in which an electronic version of a library reference was not filed, the Postal Service is directed to file an electronic version, or clarify, in compliance with this subpart, why an electronic version could not or should not be required to be supplied.

## 2. THE EVIDENTIARY STATUS OF CATEGORY 2 LIBRARY REFERENCES

As part of its initial filing, the Postal Service submitted 85 Category 2 Library References, Witness Foundational Materials, each of which is identified as supporting the testimony of one (or more) of its witnesses. These foundational materials take various forms, including, for example, data files, documentation reports, calculations, surveys, studies, and workpapers.

At the prehearing conference, held February 16, 2000, the participants were afforded an opportunity to address the evidentiary status of Category 2 Library

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<sup>17</sup> Motion re Category 1 at 8.

<sup>18</sup> Motion re Category 2 at 10. The Postal Service similarly equivocates regarding Category 3 and 5 Library References. See Motion re Category 3 at 3 and Motion re Category 5 at 6-7.

References. Parties expressing a view agreed that foundational material, if it is to be relied upon by the Commission, should be received in evidence. Tr.1/60-62. In addition, parties noted the need for notice and an opportunity to cross-examine the person responsible for developing the materials. Tr.1/62-64. I direct that the Category 2 Library References supplied by the Postal Service with its Request be sponsored by appropriate witnesses, and be made, at an appropriate time, part of the evidentiary record.

Historically, library reference practice was developed to facilitate review of data and analyses, "all or part of which might be identified for receipt into evidence."<sup>19</sup> In prior proceedings, the Commission and participants have relied on foundational workpapers, which have been treated as properly sponsored even though not, in all instances, received in evidence.<sup>20</sup> More recently, the revisions to Rule 31(b)(2) stem from the disputed evidentiary role of library references in Docket No. R97-1. As codified in revised Rule 31(b)(2), Category 2 Library References consist of "material related to the testimony of a specific witnesses, primarily that which is essential to the establishment of a proper foundation for receiving into evidence the results of studies and analyses."

Simply filing material as a library reference does not confer evidentiary status.<sup>21</sup> Such reference material may become evidence if it is relevant and material, and not unduly repetitious or cumulative.<sup>22</sup> The 85 Category 2 references filed by the Postal Service appear to satisfy this standard. The references, which as the Postal Service notes, "[relate] directly to the testimony of a specific witness,"<sup>23</sup> appear to be relevant

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<sup>19</sup> Order No. 1201, Docket No. R97-1 (November 4, 1997) at 12.

<sup>20</sup> As the Postal Service correctly observed: "[T]he link between the witness and the supporting material is clear, and witnesses can (and often do) undergo extensive written and oral cross-examination regarding their foundational material. Generally speaking, witness foundational material can be filed as workpapers, or as library references." Motion re Category 2 at 8.

<sup>21</sup> Rule 31(b)(2)(xi).

<sup>22</sup> See Rule 31(a).

<sup>23</sup> Motion re Category 2 at 8.

and material, providing both essential support underlying the Postal Service's testimony and a means for more fully understanding it.<sup>24</sup>

The inclusion of Category 2 references as evidence has several salutary effects. First, rate proceedings before the Commission involve complex ratemaking, economic, and policy issues. These reference materials represent potentially useful tools to enable participants and the Commission to fully explore the underlying support for the Postal Service's complex proposals and prepare analyses of them. The public interest is not served if materials directly related to a participant's case are unnecessarily unavailable as record evidence. This conclusion applies in particular to the Postal Service, given its pivotal role in these proceedings,

Second, the Commission's practice favors the inclusion of relevant and material information, particularly when that result is consistent with procedural fairness and participants' due process rights.<sup>25</sup> This Ruling provides ample, advance notice of the evidentiary treatment to be accorded these reference materials.

The appropriate treatment of library references was raised in the Commission's order setting this matter for hearing<sup>26</sup> and discussed at the prehearing conference. These reference materials have been on file since the inception of this proceeding; they have been and will continue to be subject to discovery,<sup>27</sup> and once sponsored by a witness, will be subjects for oral cross-examination.

Third, the receipt of these materials into evidence serves an orderly administrative process, benefiting both the participants and the Commission. Rate proceedings are, by statute, to be conducted with the utmost expedition consistent with

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<sup>24</sup> Some overlap exists between certain library references and the filed written testimony. For example, certain references simply represent an electronic version of written attachments to a witness's testimony, *e.g.*, LR-1-171 and LR-1-175.

<sup>25</sup> As noted above, the revisions to Rule 31(b) are traceable to the dispute which arose in Docket No. R97-1 concerning the use, role, and evidentiary status of library references.

<sup>26</sup> See Order No. 1279 at 4.

<sup>27</sup> See Rule 25(a).



procedural fairness to the parties.<sup>28</sup> The ten-month deadline mandated for these proceedings strains the participants' and the Commission's resources. As this case unfolds, the record will reflect the participants' deepening understanding of the Postal Service's filing. At this early stage of the proceeding, prior to hearings on the Postal Service's direct case, one cannot know what significant substantive issues may arise. Failure to provide for inclusion of these otherwise relevant and probative foundational materials in the evidentiary record would be shortsighted and inconsistent with the Commission's duty to actively and affirmatively protect the public's interest. *Scenic Hudson Preservation Conference v. Federal Power Commission*, 354 F.2d 608, 620 (2d Cir. 1965) *cert. denied*, 384 U.S. 941 (1965). Inclusion of these foundational materials in evidentiary record eliminates the controversy over whether such materials may be used by participants, their witnesses, and the Commission. This result, however, does not disadvantage the Postal Service or infringe on its due process rights.

In harmony with the Commission's ratemaking responsibilities under the Postal Reorganization Act, 39 U.S.C. §3622, and the hearing requirements of the Administrative Procedure Act, 5 U.S.C. §§ 556, 557, the prudent course is to arrange to receive these foundational materials into evidence. To that end, Attachment A identifies the 85 Category 2 Library References filed by the Postal Service at the commencement of this proceeding, along with the witness (or in some instances witnesses) substantively responsible for the preparation or development of that material. At the hearings scheduled to begin April 11, 2000 on its direct case, the Postal Service shall, to the extent it offers the pre-filed, prepared written testimony of each such witness into evidence, have that witness sponsor as evidence the Category 2 Library Reference(s) identified in Attachment A as being related to that witness.<sup>29</sup> If

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<sup>28</sup> 39 U.S.C. § 3624(b).

<sup>29</sup> In those instances in which more than one witness is identified, the Postal Service shall, if applicable, indicate at least one week prior to the witness's appearance those portions of the library reference adopted by each witness.

the witness identified is unqualified to sponsor the applicable library reference, the Postal Service shall provide (and identify one week prior to the hearings) a witness competent to do so.

Finally, in the event that any participant objects to this process, in whole or part, its objection must be filed by no later than March 22, 2000. Any participant may file a response to any such objection by no later than March 29, 2000.

### RULING

1. The Postal Service's motions for waiver, identified in footnote 3, are granted, except, as described above, that the Postal Service is directed to comply with Rule 31(b)(2)(vii) by no later than March 29, 2000.
2. At the hearings scheduled to begin April 11, 2000, the Postal Service shall provide, as described above, one or more witnesses to sponsor and, if necessary, stand cross-examination on, each of the Category 2 Library References set forth in Attachment A.
3. To the extent Postal Service determines that a substitute witness is required for any Library Reference identified in Attachment A, it shall file with the Commission a list of such witnesses, identifying the relevant library reference(s) to be sponsored by such witnesses, by no later than April 4, 2000.
4. In those instances in which more than one witness is identified with a library reference, the Postal Service shall file with the Commission a list identifying the witness and the relevant portion(s) of each library reference(s) to be sponsored by that witness by no later than April 4, 2000.

5. Objections, if any, to the procedures set forth in ordering paragraphs 2–4, are due no later than March 22, 2000, with responsive pleadings, if any, due no later than March 29, 2000.

A handwritten signature in black ink, appearing to read "Edward J. Gleiman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Edward J. Gleiman  
Chairman

**USPS Category 2 Library References  
Identified for Inclusion in the Evidential Record  
Docket No. R2000-1**

<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-4	Base Year/Roll Forward, Input Data Files	Meehan/Kashani
LR-1-5	Base Year/Roll forward, Processing Documentation Reports	Meehan/Kashani
LR-1-6	Base Year/Roll Forward (CD-ROM)	Meehan/Kashani
LR-1-7	Base Year and Roll Forward, costs Diskette	Meehan/Kashani
LR-1-8	Roll Forward Test Year Volume Variable Cost Footnotes	Kashani
LR-1-9	Reconciliation of FY 1998 Statement of Revenues and Expenses to Audited Financial Statements and Reallocation of Expenses by Component (1 diskette)	Meehan
LR-1-10	Estimated Functional Accrued Costs by Sub Functions and Cost Categories (1 diskette)	Kashani
LR-1-11	Electronic Version of Witness Kiefer's Workpapers, USPS-T-37	Kiefer
LR-1-53	TRACS Freight Rail Statistical and Computer Documentation (Source Code and Data on CD-Rom)	Xie

<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-54	Estimation of Priority Mail Weight and Average Haul by Zone-Documentation and Source Code (1 CD-Rom included)	Xie
LR-1-55	SAS Programs Used in Calculation of Air Network Premium Factors	Pickett
LR-1-56	SAS Programs Used in the Calculation of the CNET Premium	Pickett
LR-1-57	Calculation of Air Network Premium Factors	Pickett
LR-1-58	Calculation of Base Year Distribution Key for Christmas Air Operations	Pickett
LR-1-59	Calculations of Alaska Air Adjustment	Pickett
LR-1-60	Calculation of Distance-related Transportation Costs	Pickett
LR-1-61	Calculation of Cost of Eagle Daytime Operations	Pickett
LR-1-62	Materials Related to Testimony of Witness Plunkett	Plunkett
LR-1-77	Development of Piggyback and Related Factors (1 diskette)	Marc Smith
LR-1-78	Diskette of Witness Kashani's Spreadsheets for Appendices A through B and Exhibit USPS-14A (USPS-T-14)	Kashani

<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-80	Diskette of Witness Meehan's Spreadsheets for Workpaper B and Exhibit 11C (USPS-T-11)	Meehan
LR-1-81	Mail Processing Unit Costs by Shape	Marc Smith
LR-1-83	Equipment and Facility Related Costs	Marc Smith
LR-1-84	Bradley/Electronic Version of Data and Programs for Econometric Results (USPS-T-18)	Bradley
LR-1-85	Power Only Highway contract Survey (Bradley)	Bradley
LR-1-86	Responses concerning Unusual Observation in the HCSS Data Set	Bradley
LR-1-87	Periodicals Mail Characteristics Survey	Yacobucci
LR-1-88	Flats Bundle Study	Yacobucci
LR-1-89	Flats Coverage Factors	Yacobucci
LR-1-90	Flats Mail Processing Cost Model	Yacobucci
LR-1-91	First-Class Weight Studies	Daniel
LR-1-92	Standard Mail (A) Weight Studies	Daniel
LR-1-93	Periodical Weight Studies	Daniel
LR-1-94	Supporting Calculations for Weight Studies	Daniel
LR-1-95	Development of Delivery Costs by Rate Category of First-Class and Standard Mail (A)	Daniel

<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-96	Development of ECR and NPECR Mail Processing Saturation Savings	Daniel
LR-1-97	Development of Roll Forward Final Adjustment	Daniel
LR-1-98	Underlying Cost Models for roll Forward Final Adjustments	Daniel
LR-1-99	Underlying Mail Processing and Window Cost Data for Weight Studies	Daniel
LR-1-100	Underlying Cost Data for Delivery Studies (ECR and Weight)	Daniel
LR-1-101	Underlying Mail Processing Data for ECR Mail Processing Studies	Daniel
LR-1-102	First-Class, Standard (A), and Periodicals Volumes by Shape and Ounce Increment	Daniel
LR-1-103	Standard (B) Parcel Post and BPM Mail Processing and Window Service Costs (USPS-T-26)	Eggleston
LR-1-104	Program Documentation for Appendix 1 of USPS-T-26	Eggleston
LR-1-105	Standard Mail (B) Parcel Post Volume, Cubic Feet and Weight Data (USPS-T-26)	Eggleston
1-106	Van-Ty-Smith/MODES-Based Costing, Description of Spreadsheets and SAS Programs (USPS-T-17)	Van-Ty-Smith
LR-1-107	Bozzo/Programs and Electronic Input Data for Mail Processing Volume Variability Analysis (USPS-T-15)	Bozzo

<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-108	Spreadsheets and Other Supporting Materials for Witness Davis	Davis
LR-1-109	Bound Printed Matter Mail Characteristics Study	Crum
LR-1-110	Address Correction Service Costs	Campbell
LR-1-111	Derivation of Fixed-Weight Price Indices for Priority Mail, Express Mail, and UPS Ground Service	Musgrave
LR-1-112	Regression Materials and Data: Priority Mail and Express Mail	Musgrave
LR-1-113	Before-Rates and After-Rates Volume Multipliers and Forecasts for Priority Mail and Express Mail	Musgrave
LR-1-114	Before-Rates and After-Rates Forecasts for Priority Mail Volume Transfer	Musgrave
LR-1-115	1999 Platform Study	Degen
LR-1-119	Tolley/Thress Before-Rates Fixed-Weight Index Material	Tolley/Thress
LR-1-120	Tolley After-Rates Fixed-Weight Index Material	Tolley
LR-1-121	Tolley Documentation of Forecasting Model	Tolley
LR-1-122	Thress Data Used in Demand Regression and Regression Code	Thress



<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-123	Thress Cross-Section Income Coefficients and Standard Errors	Thress
LR-1-126	Explanation of Cost Reductions and Other Programs	Tayman
LR-1-127	Rollforward Expense Factors	Tayman
LR-1-128	Workers' Compensation Expense	Tayman
LR-1-129	Materials Related to Witness Musgraves' Supplemental Appendix	Musgrave
LR-1-150	Supporting Material for Incremental Cost Model	Kay
LR-1-151	Calculation of Single Subclass Stop Ratios	Kay
LR-1-155	Supporting Materials for Witness Kaneer's Post Office Box Analyses	Kaneer
LR-1-156	Computer Program Relating to the Testimony of Witness Bernstein, USPS-T-41	Bernstein
LR-1-157	Predicted Load Time Calculation	Baron
LR-1-158	Calculation of Running Time Elasticities	Baron
LR-1-159	Calculation of Street Time Proportions	Baron
LR-1-160	Documentation Supporting Witness Campbell (USPS-T-29)	Campbell
LR-1-162	Electronic Version of Spreadsheets and Workpaper	Miller
LR-1-163	Engineered Standards Database	Raymond

<b>USPS Library References</b>	<b>Title</b>	<b>Witness(es)</b>
LR-1-164	Remote Computer Reader 2000 Handwriting Recognition Upgrade Decision Analysis Report	Miller
LR-1-165	Priority Mail Pricing Spreadsheets	Robinson
LR-1-166	Standard Mail (A) Pricing Spreadsheets	Moeller
LR-1-167	Periodicals Pricing Spreadsheets	Taufique
LR-1-168	Special Services Pricing Spreadsheets	Mayo
LR-1-169	Electronic Version of First-Class Mail Rate Design Workpaper	Fronk
LR-1-171	Electronic Version of Attachments to Testimony of Witness Eggleston	Eggleston
LR-1-172	Electronic Version of Workpapers	Campbell
LR-1-173	Rural Carrier Cost System New Methodology Evaluation Report	Daniel
LR-1-174	Electronic Version of Rate Level Spreadsheets	Mayes
LR-1-175	Electronic Version of Attachments to Testimony of Witness Crum	Crum