UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2000   )   Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DONALD M. BARON
(OCA/USPS-T12-8-10)
March 17, 2000

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,

TED P. GERARDEN
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T12-8. Please refer to pages 39-41 of your testimony in Docket No. R97-1 (USPS-T-17). Please provide versions of Tables 14-16 that contain figures for base year 1998.

OCA/USPS-T12-9. Please refer to your response to interrogatory NAA/USPS-T17-10 in R97-1 (Tr. 10/5188). You were asked to provide lower bounds for the "stops effect" for the three stop types. You stated,

> [T]he upper bound estimates equal only about 1 second. So any discrepancy between these estimates and the unobserved true values must be less than 1 second. Thus, the discrepancy falls within the range of ordinary measurement and rounding error.

(a)   Is it correct that your upper bound estimates are average values for the lowest quintile of one-piece stops for each stop type? If not, please provide a more complete description of the upper bound estimates.

(b)   Please confirm that fixed load time estimates of 0 would fall within the range of ordinary measurement and rounding error. If you do not confirm, please explain.

(c)   Given that the ability to calculate an average implies the ability to calculate a variance, please provide the variance and standard deviation for the fixed load time estimates.

OCA/USPS-T12-10.   Please refer to LR-I-80, file CS06&7.xls, tab 7.0.4.2, cells D15:F15.

(a)   Please confirm that the entries in these cells are the fixed times at stops for SDR, MDR, and BAM stop types, respectively. If you do not confirm, please

explain what the values in these cells represent and identify where the values for fixed times at stops may be found.
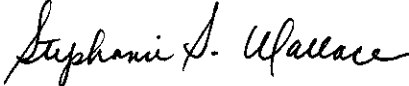
(b)   Please confirm that setting these cells to zero eliminates the fixed time at stops effect. If you do not confirm, please explain how to remove the fixed time at stops effect from the base year cost matrix.

(c)   Please confirm that eliminating the fixed time at stops effect increases volume variable load time costs in segment 7 by $163 million. If you do not confirm, please provide the correct amount and show its derivation.

OCA/USPS-T12-11.   Please refer to witness Daniel's responses to interrogatories AAPS/USPS-T28-3-5. Witness Daniel refers to development of a distribution key that distributes elemental load time on the basis of weight.

(a)   Please confirm that the distribution key used to distribute elemental load time costs in the base year is pieces, not weight. If you do not confirm, please provide a citation to CS06&7.xls by tab, by cell, showing the distribution of elemental load time costs by weight.

(b)   Please explain how, if at all, weight is used to distribute elemental load time costs in the roll-forward.

(c)   Witness Daniel seems to be testifying that weight affects elemental load time costs. Please explain why weight is not used, at least in part, to distribute elemental load time costs in the base year.

Docket No. R2000-1

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 12 of the rules of practice.

Stephanie S. Wallace

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March 17, 2000