

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
IN COMPLIANCE WITH PRESIDING OFFICER'S RULING NO. R2000-1/13  
REGARDING ELECTRONIC VERSIONS OF  
LIBRARY REFERENCES

In Presiding Officer's Ruling No. R2000-1/13, issued March 14, 2000, the Postal Service was directed by this date to provide electronic versions of library references covered by its initial motions for waiver, or explain why an electronic version could not or should not be required. In conjunction with this response, through a separate notice filed today, the Postal Service is providing electronic materials relating to USPS-LR-I-1, 2, 13, 14, 18, 26, 27, 35-39, 45-48, 63, 65, 67, 69-72, 117, 118, and 124. Therefore, the balance of this response is to explain the status of those library references for which no electronic version was filed previously, and which are not included in the above group. For ease of exposition, to the extent possible, library references with a similar status will be discussed in groups.

Material Appearing in Other References

Numerous library references contain no electronic version because the hardcopy material presented therein appears in an electronic version in some other library reference. Thus, the materials in I-21, 24, and 31 appear in I-32, the materials in I-22 appear in I-23, the materials in I-33 appear in I-34, the materials in I-40 - 42 appear in I-43, the materials in I-66 appear in I-68, and the materials in I-73-75 appear in I-76.

Mainframe Material

A number of library references contain hard copy of materials printed off of a mainframe computer. Attempts to convert these materials into files available in a non-mainframe context causes them to lose their formatting, and often renders them

virtually useless. This is the case with I-3, 4, 5, 131, 132, and 170. With respect to I-4, the same basic information appears electronically in I-6, and similarly, in the PRC version, the same basic information in I-131 appears on the CD in I-133. (I-131 is the hardcopy equivalent in the PRC version of the Postal Service's hardcopy rollforward workpapers, which have never been provided electronically per se, but, once again, the same basic information is provided electronically elsewhere.) Both I-5 and I-132 have traditionally been provided in hardcopy with the specific purpose of allowing reviewers to follow (in the most user-friendly format) what the control strings in the machine-readable versions are doing.

#### Hand-Written Inputs

Several library references never existed in an electronic format because they are hard copies of materials which include hand written inputs. Included within this group are I-8, 85, 86, and 134.

#### Pre-Existing Documents

Certain library references are pre-existing documents (handbooks or collective bargaining agreements) for which no electronic version was obtained. Included within this group are I-79, 154, and 164. (Electronic versions of other handbooks could be obtained, and are being provided for I-14, 18, and 37).

#### Aggregated Inputs

Certain library references are hard copy aggregations of material from a variety of sources. There exists no unified electronic version to duplicate and provide with the hard copy material. In the case of I-19, much of this material comes from a variety of different mainframe sources. In the case of I-125 (FY 1998 billing determinants), the electronic versions of the rate design spreadsheets of the rate design witnesses either provide either the same or similar information. (To the extent that the information used by the rate design witnesses is different from the 1998 billing determinants -- due to the

incorporation of FY 1999 information -- the rate design material obviously has much greater analytic utility.)

Household Diary Study

LR-I-116 is the 1998 Household Diary Study. The Postal Service attempts to recoup some of the costs of conducting the Diary Study by selling copies (hardcopy and electronic) to those who find this information to be of value. If an electronic copy were put on the Commission's webpage, it would not be possible to expect interested potential purchasers to pay the Postal Service to receive the same material available for free elsewhere.

Workers' Compensation Model Output


LR-I-128 is the printed version of the workers' compensation liability estimation model output for the model run incorporated into the rate case filing. It no longer exists electronically, as the model overwrites output files once the model is updated and run with new data. The only way to recreate the model output would be to rekey manually all of the input data, an immensely time-consuming task.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

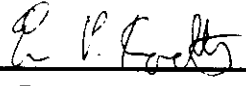


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March 29, 2000

**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.

  
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Eric P. Koetting

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