

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

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000 )

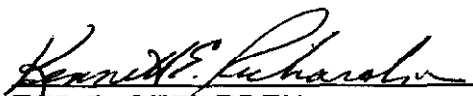
Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE  
FOLLOW-UP INTERROGATORY TO  
UNITED STATES POSTAL SERVICE  
WITNESS BOZZO (OCA/USPS-T15-64)  
March 31, 2000

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Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits a follow-up interrogatory and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 to the United States Postal Service, dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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Director  
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OCA/USPS-T15-64. Please refer to your response to interrogatory OCA/USPS-T-15-50, filed on March 24, 2000. You provided a variety of files, variously labeled mpe.map, mpe93.txt, pse.map, pse93.txt, among others. The following questions are focused on attempting to determine the meaning of the contents of the files.


- (a) Please provide column headings for all files provided, including but not limited to the aforementioned files.
- (b) On the assumption that mpe.map and pse.map present a listing of various types of equipment in terms of a type of functional number and equipment description, please explain why there are two different files and explain the contents of the files. If this assumption is incorrect, please provide information that would permit an understanding of the files. Please also provide any relevant documentation with the Postal Service that would assist in understanding the contents of the files.
- (c) In the case of the pse93.txt file and the mpe93.txt file, on the assumption that the fourth column refers to the value of capital equipment, please indicate whether the value in the fourth column is in current year or constant year dollars, whether the value of the equipment is a stock of equipment or a flow of equipment dollars, and the year of the relevant dollars.
- (d) In the event that you have provided dollar values in a stock of equipment form, please verify whether the data are consistent with the other data in your analysis. On the assumption that the data are in a stock of equipment form and that QICAP is in a flow of equipment dollars form and is adjusted for a variety of

depreciation, inflation, and other factors on a quarterly basis, please present the dollar values in a form consistent with the data used in your analysis.

- (e) In the case of capital equipment designations, you do not appear to have referenced the equipment in terms of the functions performed as presented in your analysis, *e.g.*, LSM, OCR, etc. Please provide the tie between the capital equipment entries and the function(s) being performed for each IDNUM.
- (f) Please confirm that the aggregate of all of the data provided in the response for a facility IDNUM is equal to the total capital at a facility. If not, please explain.
- (g) Assuming that these data provide an accurate measure of capital at a facility, why did you not use these data in disaggregated form on a quarterly basis in terms of functions in the analysis rather than using one QICAP variable?

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

Washington, D.C. 20268-0001  
March 31, 2000