

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SCOTT J. DAVIS
(DFC/USPS-T30-65-76)

March 31, 2000

Pursuant to Rules 25-27, I hereby submit follow-up interrogatories to United States Postal Service witness Scott J. Davis.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

Respectfully submitted,



Dated: March 31, 2000

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

March 31, 2000
Emeryville, California

DFC/USPS-T30-65. Please refer to your response to DFC/USPS-T30-21(b).

- a. Please explain how the data provided in response to DFC/USPS-T30-12(a) are used to calculate “the associated carrier waiting time resulting from this activity.”
- b. Please explain the meaning of Function 1.4, “Carrier Waiting for Review of Return Receipt,” a cost item that appears in your cost study in USPS-LR-I-108.
- c. USPS-LR-I-108 indicates that “Carrier Waiting for Review of Return Receipt” is based on data from a 1999 study. Please provide the raw data for “Carrier Waiting for Review of Return Receipt” and all instructions and descriptions of the methodology associated with this data-collection effort. (This information should have been provided in response to DFC/USPS-T30-12(a) and 21(b). If it was, please identify the location of this information and how this information was converted into a cost estimate.)
- d. Please explain when and how data for Function 1.2, “Carrier/Driver Delivery & Call Window/Box Second Delivery,” were collected.

DFC/USPS-T30-66. For each of the 24 facilities listed in the attachment to the response to DFC/USPS-T30-12(a), please provide the following information, in one chart or spreadsheet: CAG level, number of city carrier routes that the facility serves, number of rural carrier routes each facility serves, and post-office delivery statistics. Please use the definition of “post-office delivery statistics” that the Postal Service uses in the “Post Office Delivery Statistics” section of the *National Five-Digit ZIP Code and Post Office Directory* (see, e.g., 1998 edition, Section 4).

DFC/USPS-T30-67. Please refer to your response to DFC/USPS-T30-23.

- a. Please explain the meaning and significance of a “low standard error.”
- b. Do your survey results have a low standard error? Please explain and provide all pertinent numbers, calculations, results, and conclusions pertaining to this issue.
- c. Please identify the number of post offices you would need to survey in order to obtain statistically valid survey results. Please provide all pertinent numbers, calculations, results, and conclusions pertaining to this issue.
- d. Please confirm that the need to “balance[] the ideals of obtaining abundant data from many facilities against the importance of completing this study within a limited time frame, the demands that this study would place on the field during a period of field budget cutbacks, and [your] own need to devote time to various projects and initiatives” explains why you cannot provide assurance that these survey results are statistically valid or reliable. If you do not confirm, please explain.
- e. Please confirm that your survey would have produced results more statistically valid or reliable than the results you actually achieved if you had pursued the “ideal” of obtaining “abundant data from many facilities.” If you do not confirm, please explain.

- f. Please confirm that limited time caused you or the Postal Service to produce survey results that may not be statistically valid or reliable. If you do not confirm, please explain.
- g. If the Postal Service had asked you to produce a statistically valid cost study and had given you the necessary time and resources, how many post offices would you have surveyed, and which steps that you did not take for this survey would you have taken in analyzing and using these data?

DFC/USPS-T30-68. Please refer to your response to DFC/USPS-T30-28. To the best of your recollection, please provide the number of courses you have taken in statistics, the titles of those courses, and the level (graduate or undergraduate) of each course.

DFC/USPS-T30-69. Please refer to your response to DFC/USPS-T30-27.

- a. Do you believe that calculation of the standard deviation of data is either an important or necessary step in evaluating the statistical reliability or validity of data or a study? Please explain.
- b. Do you believe that calculating the 95-percent confidence interval for data is either an important or necessary step in evaluating the statistical reliability or validity of data or a study? Please explain.
- c. Please provide any confidence intervals that you calculated in analyzing data on the cost of providing return-receipt service.

DFC/USPS-T30-70. Please refer to your response to DFC/USPS-T30-32.

- a. Please define "reasonable approximation."
- b. Suppose the true number of return receipts processed at a facility was 537. Would 500 be a reasonable approximation of the true number?
- c. Suppose the true number of return receipts processed at a facility was 537. Would 600 be a reasonable approximation of the true number?
- d. Please provide all facts and information that confirm that the numbers of return receipts that facility 5 reported are, in fact, a reasonable approximation of the true number.
- e. Please provide all facts and information that confirm that the numbers of return receipts that facility 5 reported are not inaccurate by a sum of 50 or more return receipts per day.

DFC/USPS-T30-71. Would it be reasonable to conclude that your study provides a reasonable approximation of the time that clearing clerks spend reviewing return receipts, rather than a statistically valid study or survey? If not, please explain why not.

DFC/USPS-T30-72. For an office that completed one return receipt and whose actual time was less than 30 seconds, do you believe that this office would have rounded down to zero minutes? If yes, please explain the basis for your contention.

DFC/USPS-T30-73. Please refer to your response to DFC/USPS-T30-38.

- a. Where in your instructions did you authorize post offices to report reasonable approximations, rather than actual data?
- b. How do you know that facility 25 did not measure the time spent processing 10 return receipts, calculate 30 seconds per return receipt based on this sample, and use 30 seconds per return receipt as the time per return receipt for all return receipts reported during the survey week?
- c. How do you know that facility 25, in estimating 30 seconds per return receipt, sampled a statistically significant number of return receipts before dividing the number of return receipts by the number of minutes to arrive at 30 seconds per return receipt?
- d. How do you know that facility 25 performed any mathematical calculations whatsoever of the form quantity divided by time in estimating that the average time per return receipt was 30 seconds?

DFC/USPS-T30-74. Please confirm that the “norm” to which you refer in, e.g., DFC/USPS-T30-30, is, itself, based on reasonable approximations, not statistically valid calculations. If you do not confirm, please explain.

DFC/USPS-T30-75. All else equal, please confirm that, generally, the wider the variation in data results (e.g., number of return receipts, number of minutes), the larger the sample size must be to ensure statistically valid and reliable results. (For purposes of this interrogatory and by way of example, a variation from 5 to 30 seconds is greater than a variation from 5 to 10 seconds.) If you do not confirm, please explain.

DFC/USPS-T30-76. Please refer to your response to DFC/USPS-T30-43. Was your sample size sufficiently large to generate statistically valid or reliable survey results that can be used to estimate labor costs for return receipt? Please explain and provide any calculations supporting an affirmative response.