

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 UNITED STATES POSTAL SERVICE WITNESS RAMAGE
TO QUESTION OF THE OFFICE OF THE CONSUMER ADVOCATE
DURING ORAL CROSS-EXAMINATION

The United States Postal Service hereby provides the responses of witness Ramage to the question raised by the Office of the Consumer Advocate during cross-examination on April 12, 2000.

The question is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 18, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAMAGE TO
QUESTION RAISED BY
OFFICE OF THE CONSUMER ADVOCATE DURING HEARINGS

Question of the OCA at Tr. 4/1143-44:

Q Just so we are sure on the question, what I am hoping to determine is whether IOCS could recognize the kinds of pieces that the Chairman was discussing earlier, the letters that weigh more than the break point, and somehow reclassify their shape during computer processing of the data.

Response:

This question is directed towards exploring the feasibility of adjusting IOCS data so that it is consistent with shape definitions used for volume data for Standard A letters. An alternative approach would be to produce volume estimates for Standard A letters that are consistent with the IOCS shape definitions. My understanding is that witness Daniel employed this latter approach to ensure consistency between the costs and volumes. See Tr. 4/1202. Since witness Daniel relies on PERMIT volumes corresponding to the Domestic Mail Manual (DMM) shape definitions, she uses consistent shape definitions for her volume and cost estimates. The IOCS shape definitions and the DMM shape definitions both define letter shape according to the same physical dimensions of the piece. See F-45, page 12-8, and C050.2.0 of the DMM 55.

Upon review of data collected by the IOCS, it would not be possible to identify all IOCS records having Standard A letter activity codes derived from pieces which are over the breakpoint. This is due partly to the fact that IOCS question 23G records weight in half-ounce intervals for pieces weighing less than 4 ounces, and partly to the fact that some IOCS records having a Standard A letter activity code are generated from counted item mixed mail observations for which piece weights are not recorded.

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For IOCS Standard A records having a letter shape activity code (1310 - 1360), there may or may not be a valid weight recorded in F165. For example, if the record is generated from a divided mixed mail item, weight fields would contain zeros.

If there is an entry in the ounce question (Q23G, variable F165), there are 3 possibilities:

1. Weight is less than 3 ounces (an entry of A-F in this question). This is not an overweight Standard A letter. For BY 1998, there were 14,345 observations of this type.
2. Weight is between 3 and 3.5 ounces (choice "G"). This might be an overweight Standard A letter. For BY 1998, there were 183 observations of this type.
3. Weight over 3.5 ounces. This is an overweight standard weight letter. For BY 1998, there were 311 observations of this type.

Based on IOCS data, it is not possible to determine whether a particular Standard A letter observation between 3 and 3.5 ounces was over the breakpoint.

DECLARATION

I, Mark F. Ramage, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Mark F. Ramage

Date: 4/18/00

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.

for 

Kenneth N. Hollies

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