

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2000-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS SMITH  
(USPS/OCA-T4-17-19)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Smith:

USPS/OCA-T4-17-19.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

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May 31, 2000

OCA/USPS-T4-17. Please refer to your testimony at page 23, lines 16-17, where you state. "The differences between Dr. Bradley's data set and the data set used in the current study are actually quite minor."

- a. Does this statement (i.e., the "data set used in the current study") refer only to the portion of Dr. Bozzo's data set obtained from MODS and provided in USPS-LR-I-107?
- b. If your answer to part (a) is negative, in whole or in part, please specify your understanding of which variables in the data set provided in USPS-LR-I-107 were not present in Dr. Bradley's data set.

OCA/USPS-T4-18. Please refer to your testimony at page 23, lines 17-19. You state that "[q]uarterly data are used in the current study in lieu of four week accounting period data in order to smooth out inaccuracies."

- a. Is Dr. Bozzo's response to MPA/USPS-T15-7 (Tr. 15/6273-6274) the basis for the quoted statement? If not, please specify the basis for your statement.
- b. Does your quoted statement completely represent Dr. Bozzo's stated reasons for choosing the quarterly observation frequency? Please explain any affirmative answer.
- c. Other things equal, is a method that "smooth[s] out inaccuracies" preferable to one that does not? Please explain any negative answer.

OCA/USPS-T4-19. Please refer to your testimony at page 23, line 19, where you state "the rejection criteria are relaxed." What, specifically, are the "rejection

criteria" to which the statement refers? As part of your answer, please provide citations to any portions of Dr. Bozzo's testimony upon which the statement is based.

## 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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written above a solid horizontal line.

Susan M. Duchek

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