

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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS SMITH
(USPS/OCA-T4-32-35)

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-T4-32-35.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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June 14, 2000

USPS/OCA-T4-32. Please refer to your response to USPS/OCA-T4-5(b). Your response does not appear to indicate whether you performed the specified quantitative analysis, as requested in the interrogatory. Please confirm that you did not “perform any quantitative analysis of Dr. Bozzo’s data, models, or results to determine whether any relevant discontinuities actually exist and/or to quantify their effects.” If you do not confirm, please explain.

USPS/OCA-T4-33. Please refer to your response to OCA/USPS-T4-11(a). Your response does not appear to indicate your agreement or disagreement with the quoted statement in the interrogatory, as requested. However, in the response you state, “...conceivably, there could be a growth in delivery points without a change in volume.” Does this statement imply that you disagree, at least in part, with the statement: “growth in delivery points must be considered part of the growth in volume”? If not, please explain fully.

USPS/OCA-T4-34. Please refer to your response to OCA/USPS-T4-11(b).

- a. Please provide a mathematical formula to clarify your statement that “only the estimator associated with the TPF variable is used in computing the variability.” Please relate any mathematical notation you use to that of the estimating equations reported by Dr. Bozzo at pages 117-118 of USPS-T-15.
- b. In the last sentence of your response, you appear to modify the statement quoted from page 5, lines 4-6, of OCA-T-4. Please explain whether this is a correct interpretation. If it is, why does the original statement quoted from

page 5, lines 4-6, of OCA-T-4 require modification? If not, please provide the correct interpretation of the last sentence of your response to USPS/OCA-T4-11(b).

USPS/OCA-T4-35. Please refer to your response to USPS/OCA-T4-14(b).

Please provide a detailed citation to support your statement that Dr. Bozzo

“indicated” that “data from two activities are commingled.”

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.



Susan M. Duchek

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