

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
MPA WITNESS CROWDER
(USPS/MPA-T5-32-35)

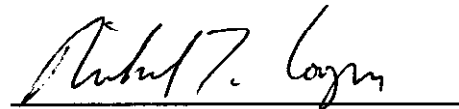
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Crowder: USPS/MPA-T5-32-35. To the extent that any particular question in this set may be read to require disclosure of confidential information in violation of Presiding Officer's Ruling No. R2000-1/27, it is requested that an unredacted response containing the confidential information be filed under seal in conformance with Ruling 27 and provided to the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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June 30, 2000

USPS/MPA-T5-32. Please refer to your response to USPS/MPA-T5-1 where you state:

The fixed time I refer to is fixed per stop. Assuming that a stop must be accessed or covered, then fixed time is the portion of time at that covered stop which does not vary with stop volume.

- a. Confirm that this definition of fixed time means that the amount of fixed time at a particular stop can be no greater than the total time at that stop for loading one piece of mail. If you do not confirm, explain how fixed time at the stop can exceed the total time at that stop for loading one piece of mail.
- b. Confirm that your notion of "fixed time" means that this fixed time is incurred if any volume is delivered to the stop but that the amount of fixed time is independent of the amount of volume delivered. If you do not confirm, please explain how the volume delivered at the stop affects this fixed time.
- c. Confirm that access time is incurred if any volume is delivered to the stop but that the amount of access time is independent of the amount of volume delivered. If you do not confirm, please explain how the amount of volume delivered at the stop affects access time.

USPS/MPA-T5-33. Please refer to your response to USPS/MPA-T5-1 where you state:

“Even within groups of stops where combinations of characteristics are constant, fixed stop time will vary for other unexplained reasons. As with any random variable, the proper measure for fixed stop time is its expected value”

- a. Confirm that you are asserting that fixed time at a stop is a random variable. If you do not confirm, please explain the use of the terms “random variable” in the quotation.
- b. Provide all studies, analyses, or record citations that support the assertion that fixed time at a stop is a random variable.
- c. Provide all studies, analyses or record citations that support the claim that fixed time at a stop varies for “other unexplained reasons.”
- d. If your answer to a., above, is in the affirmative, please explain what activities are taking place during the “random” fixed time at a stop.
- e. Is the intercept in a population regression equation a random variable? Provide citations to the economics or statistics literature to support your answer.
- f. Is the intercept in an estimated regression a random variable? Provide citations to the economics or statistics literature to support your answer.

USPS/MPA-T5-34. Please refer to your response to part (b) of USPS/MPA-T5-2 which asks you whether or not "fixed stop time" is part of "true" load time as you define it. Your response states that "fixed stop time" is a "component of route load time" and "might explain part or all of coverage-related load time," but it does not answer the question asked.

Please answer with a simple yes or no, is "fixed stop time" part of "true" load time as you define it.

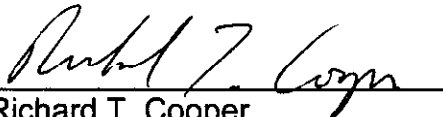
USPS/MPA-T5-35. Please refer to equation 1 in your response to part (a) of USPS/MPA-T5-2:

$$L = V*u + AS(V,PS) * f$$

- a. Confirm that $V*u$ represents elemental load time in that equation. If you do not confirm, please explain how you would calculate elemental load time using this equation.
- b. Confirm that $AS(V, PS) * f$ represents coverage related load time in that equation. If you do not confirm, please explain how you would calculate coverage-related load time using this equation.
- c. Confirm that the two parts, $V*u$ and $AS(V,PS) * f$, sum to total accrued load time on the route. If you do not confirm, please explain your use of the phrase "total load time on the route."
- d. Confirm that if the route in question had one single delivery stop, then $V*u$ would be the variable load time at that stop. If you do not confirm, provide the expression for variable load time at that stop.
- e. Confirm that if the route in question had one single delivery stop, then $AS(V, PS) * f$ would be the fixed load time at that stop. If you do not confirm, provide the expression for fixed load time at that stop.
- f. Confirm that if the route in question had one single delivery stop, then the two parts sum to total accrued load time on the stop. If you do not confirm, please provide the expression for total accrued load time at the stop.

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.


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