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

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POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

# NOTICE OF UNITED STATES POSTAL SERVICE CONCERNING ERRATA TO REBUTTAL TESTIMONY OF WITNESS STAISEY (USPS-RT-16) (ERRATUM)

The United States Postal Service hereby files this notice of errata to the rebuttal

testimony of witness Staisey (USPS-RT-16). The following corrections are being made:

On page 11, line 2, "200" is changed to "93" and "4" is changed to "3".

On page 18, line 15, "rate" is changed to "bias".

Corrected pages are attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 August 17, 2000

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that 216 million pieces per year would shift to PC postage. These results are 1 calculated from a sample size of **93** respondents, where only **2** provided positive 2 responses (Tr. 23/10599). In another example, witness Heisler concludes, from 2 3 positive responses, that 6.8 million pieces would shift in the non-household 4 sector (26-50 employees) for the scenario where there is no discount on First-5 Class mail printed by a meter (Tr. 23/10602). Normally, a small sample size 6 leads to large coefficients in variation, an important criteria when evaluating 7 8 statistical results. Given the small sample sizes in the household and nonhousehold studies, we would expect the coefficients of variation to be high. 9 Witness Heisler, however, does not provide coefficients of variation when asked 10 to do so in USPS/PB-T3-10 (Tr. 23/10622). Instead he provides upper and lower 11 bounds, which have no statistical meaning. Since the true coefficients of variation 12 13 are not provided, one cannot test directly the hypothesis that the small sample sizes lead to large coefficients of variation. However, one can look at the upper 14 and lower bounds provided in USPS/PB-T3-10 and see that these numbers are 15 very large. These two examples demonstrate that the results of the number of 16 pieces potentially affected by PC postage or postage meters are based on 17 sample sizes that are too small to provide meaningful results from the number of 18 positive responses. 19

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#### 2. Response rate not provided

Throughout his study, witness Heisler does not explicitly state the response rate associated with the Household and Non-Household Surveys. In market research studies, one would normally expect to have the response rate

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postage from the Internet (whether an Internet connection when printing postage
is required or not), these small businesses are not properly educated about the
PC postage concept and are therefore providing responses resulting from a
questionnaire bias. The conclusions made from this survey about the interest
level in the PC postage market are not valid or reliable.

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### 7 B. Methodological Flaws

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### 1. Low response rate

In order to present valid conclusions from a market research survey that 9 are an appropriate estimate of the population's interest in a new product, the 10 11 response rate in a study needs to suggest that the respondents are providing 12 information that is indicative of the population at large. The response rate of this survey, as stated by witness Boggs (Tr. 29/13834) is 16.5 percent. Since a very 13 14 large majority of the randomly selected small businesses are non-respondents (a potential 83.5% non-response bias), this non-respondent population may have 15 provided significantly different responses from those who did respond. This low 16 response rate does not allow for conclusions to be made that are indicative of the 17 small business population. 18

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## 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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Michael T. Tidwell

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