

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, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS CARL G. DEGEN  
(OCA/USPS-T12-1-11)  
July 22, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,

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Director

Office of the Consumer Advocate

*Emmett Rand Costich*

EMMETT RAND COSTICH

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Office of the Consumer Advocate

OCA/USPS-T12-1. Please provide IOCS sampling information disaggregated by BMC's, MODS, and non-MODS offices. In particular, please provide:

- a. The number of BMC's, MODS, and non-MODS offices by CAG existing at the beginning of FY 1996.
- b. The number of employees by craft (or craft cost pool) and CAG at BMC's, MODS, and non-MODS offices for FY 1996. These numbers can be presented by pay period or as an average of the pay period employee complements over the year. If provided as an average and there is significant fluctuation by pay period in the employee complements, then please provide the high and low complement values also.
- c. The total employee compensation (from the Payroll Data System) by craft and CAG at BMC's, MODS, and non-MODS offices for FY 1996.
- d. A list of CAG A, CAG B, and BMC's that were not included in the FY 1996 IOCS office sample. Please designate the CAG and MODS status for each of these offices.
- e. For each office in part d of this interrogatory, please provide the number of employees by craft at BMC's, MODS, and non-MODS offices for FY 1996. Please provide numbers comparable to those provided in part b of this interrogatory.
- f. For each office in part d of this interrogatory, please provide the total employee compensation (from the Payroll Data System) by craft and CAG at BMC's, MODS, and non-MODS offices for FY 1996.

- g. The number of BMC's, MODS, and non-MODS offices by CAG that are in the FY 1996 IOCS sample.
- h. The effective employee sample size by craft at BMC's, MODS, and non-MODS offices for FY 1996. Please provide numbers comparable to those provided in part b of this interrogatory.
- i. The total employee compensation (from the Payroll Data System) by craft and CAG at BMC's, MODS, and non-MODS offices for FY 1996 IOCS sample offices.

OCA-USPS-T12-2. Please refer to footnote 13 of your testimony. This note states that IOCS does not sample Remote Encoding Centers, but that a distribution methodology based on sampled RBCS images is under development.

- a. Please describe the plans and current status for this Remote Encoding Center distribution methodology.
- b. Please describe any changes in the treatment of Remote Encoding Center costs between FY 1995 and FY 1996 and between FY 1996 and BY 1996.

OCA/USPS-T12-3. Please refer to Tables 4 and 5 of your testimony.

- a. Please confirm that Table 4 contains the variability for each of the mail processing cost pools. If you do not confirm, please provide the cost pool variabilities.
- b. Please confirm that the costs shown in Table 5 incorporate the variability figures of Table 4. If you do not confirm, please explain how the Table 4 variabilities are used.

- c. Suppose that there were an error in the second row of Table 4, and that the variability for the OCR cost pool should be 85 percent instead of the 78.6 percent listed in your table. Then please confirm that Table 5 should be modified by multiplying all entries in the column labeled "MODS ocr" by the ratio (85/78.6). If you do not confirm, please explain how Table 5 would need to be updated.

OCA/USPS-T12-4. Please refer to LR-H-146.

- a. Please provide a copy of the SAS logs for programs listed in this library reference.
- b. Please provide the H-146 SAS programs in electronic form.

OCA/USPS-T12-5. Please refer to LR-H-146, lines 77-280 of program MODSPOOL.

- a. Please provide a list of valid MOD values and a description of each.
- b. Please confirm that LDCs defined at lines 77-280 correspond to those listed on pages I-32 to I-38 of H-146. If you do not confirm, please explain.
- c. Please describe the difference between LDC1 (program MODSPOOL, line 65) and the coded LDC's at lines 77-280.
- d. Line 364 of MODSPOOL refers to LDC of data set LDC96M. Is this LDC equivalent to the LDC codes assigned at lines 77-280 based on the MODS values? Please explain.

OCA/USPS-T12-6. Please refer to program MODSPOOL of LR-H-146.

- a. Line 331 refers to a data set named "PAY.LDC96." Please describe the contents, variable names and definitions, and possible values of all variables in data set PAY.LDC96.
- b. Has PAY.LDC96 been included in a library reference in this docket? If not, please provide this file in electronic form.
- c. Lines 62-67 of MODSPOOL read a file named OPLDC96.DATA, referenced by infile MOD96. Please describe the contents, variable names and definitions, and possible values of all variables for OPLDC96.DATA.
- d. Has OPLDC96.DATA been provided as a library reference in this docket? If not, please provide this file in electronic form.

OCA/USPS-T12-7. Please confirm that the cost data reporting system for cost segment 3.1 has been changed for BY 1996 by incorporating MODS-based data and by redefining variability assumptions for clerk and mailhandler costs. If you do not confirm, please explain the purpose of your testimony.

OCA/USPS-T12-8. Please refer to page II-5 of H-146. This refers to the tally encrypted finance number, F2 on the FY 1996 IOCS data set. If additional IOCS variables are encrypted or suppressed, then:

- a. Please list all other IOCS variables that are encrypted.
- b. Please list all other IOCS variables that are suppressed.

- c. If any IOCS variables are suppressed, then how are they coded on the H-23 data file? If suppressed values are simply blanked out, how can they be distinguished from missing values?

OCA/USPS-T12-9. Please refer to programs MOD1POOL (lines 13-209) and MODSPOOL (lines 77-280) of H-146. Please confirm that the LDC assignment in MOD1POOL is identical to the assignment of LDC values in MODSPOOL. If you do not confirm, please identify the differences and explain why a different algorithm was used.

OCA/USPS-T-12-10. Please refer to program MOD1POOL, lines 297-413, of H-146. This section of code begins with the comment "REMAP TALLIES WITH NO MODS CODES OR INVALID MODS CODES."

- a. Please confirm that this program only processes IOCS data from MODS offices. If you do not confirm, please explain.
- b. How many MODS IOCS tallies had no MODS codes?
- c. How many MODS IOCS tallies had invalid MODS codes?
- d. How many unique MODS finance numbers were associated with the IOCS tallies having invalid or missing MODS codes?
- e. Do all the relationships implied at lines 297-413 also hold for tallies with valid IOCS MODS codes? Please explain.
- f. Please explain how MODS codes could be missing or incorrect for an IOCS observation at a MODS office, collected using IOCS CODES data entry devices.

Please explain why IOCS CODES software would be programmed to allow entry of invalid or missing MODS codes at MODS offices.

OCA/USPS-T12-11. Please refer to page II-6 and line 415 of program MOD1POOL of library reference H-146. Line 415 begins a section of the program with the comment "MODS-BASED ENCIRCLEMENT."

- a. Please explain what is meant by the term "MODS-based encirclement."
- b. Please provide all documents or materials prepared by or for any subdivision of the Postal Service related to "MODS-based encirclement."
- c. Please describe what is accomplished by the "MODS-based encirclement" portion of MOD1POOL, at lines 415-505.

#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
EMMETT RAND COSTICH  
Attorney

Washington, D.C. 20268-0001  
July 22, 1997