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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0000

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM  
WITNESS BRADLEY  
(OCA/USPS-T13-29(a) and (c)4 AND 37(b)(iii)-(b)(x))  
AND MOTION FOR EXTENSION OF TIME

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T13-29(a) and (c) and 37(b)(iii)-(b)(x), filed on July 16, 1997, and redirected from witness Bradley.<sup>1</sup>

The responses to OCA/USPS-T13-37(b)(iii), (iv), (vi), (vii) and (x) indicate that a library reference containing certain of the requested materials will be provided on diskette in several days. Preparing these materials is taking longer than anticipated due to required coordination between Headquarters and the St. Louis ISSC, and the unavailability of knowledgeable personnel due to vacation schedules. The Postal Service accordingly requests an extension of time until Friday, August 1, 1997 to file the library reference. Counsel for the OCA has indicated that he does not oppose this brief extension.

Each interrogatory is stated verbatim and is followed by the response.

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<sup>1</sup> By agreement of counsel for the Postal Service and counsel for the OCA, the OCA's request in OCA/USPS-3(a) that witness Bradley respond to his outstanding interrogatories from Docket No. MC97-2 (OCA/USPS-T4-11-48), will be treated as if those interrogatories were served directly on witness Bradley in this docket, and accordingly were renumbered OCA/USPS-T13-1-38.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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OCA/USPS-T13-29. Please refer to your response to OCA/USPS-T4-9, including the standard Postal Service forms that were attached.

- a. The first page of the attachment is entitled "Transportation Services Bid or Proposal & Contract for Regular Service." Is this the basic contract document from which information is extracted to be put into the HCSS system? If not, what is its purpose?
- b. Refer to the block with the heading "2. Rate of Compensation, Bid or Proposal" on that same first page. Inside the block appears the following: "WRITTEN DOLLAR AMOUNT (Bid or proposal ... submitted on a single annual rate basis unless the solicitation specifically calls for bids/proposals at a per mile, per trip, or other unit rate.)" Is it possible that some of the "unusual observations" noted in your analysis may have occurred because of confusion as to what type of solicitation was called for, e.g., a contract recorded as having an "annual cost" of \$1 in reality reflected a contract for \$1 per mile?
- c. Refer to the page entitled "Highway or Domestic Water Transportation Contract Information and Instructions" which follows the page entitled "Amendment No. 3." In Part (A)(2) of the instructions, reference is made to contract solicitations for "advertised contracts" and "negotiated contracts." Please explain the differences between the two types of contracts, and what discretion the Postal Service has to employ one kind of contract over another. Please also supply documents containing *guidelines or regulations that explain the differences and the scope of Postal Service discretion.*

RESPONSE

- a. Forms are not stored in the conventional sense in HCSS.

Rather all possible language used on the forms is available for selection. To generate the forms for a particular contract, the operator executes a program that generates the forms with the contract-specific data entered in the appropriate places. In essence, a template of standard language is overlaid onto the contract specifications.

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- b. Answered by witness Bradley.
- c. Basic purchasing methods are described in the Postal Service Procurement Manual, Chapter 4, and the Postal Service Purchasing Manual, Chapter 4. These manuals are available in the Postal Service library. The Purchasing Manual is sold to the public through Superintendent of Documents, Government Printing Office, 941 W. Capitol Street, NE, Washington, D.C. 20402-9371, (202) 512-1800.

Traditionally, the Postal Service has used advertised contracts to purchased regular transportation service and negotiated contracts to purchase emergency service. The Postal Service is in the trial stage of converting all highway contracting to negotiated contracts. Once the implementation of this change begins, it will take approximately four years to convert all contracts to the new negotiated purchasing method. HCSS handles contract data for both types of contracts.

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OCA/USPS-T13-37. Please refer to your response to OCA/USPS-T4-7 and to your workpaper WP-1.

- a. Your response to part a of OCA/USPS-T4-7 states,  
There was no data entry required for the construction of the dataset I used. It existed in electronic form before the construction of the extract of the data used in my analysis.

Page 1 of WP-1 states,

A program was developed to be used to extract the required variables from the HCSS data base at each individual HCSS site.

Do you consider entering data and developing a program to be different processes? If so, please describe the differences.

- (i) Would you agree that entering data and writing computer code both involve keystroking? If not, please explain.
- (ii) Did the data in the HCSS data base always exist in electronic form? If so, please describe how the data were initially generated.
- b. Your response to part b of OCA/USPS-T4-7 states,  
I did work closely with postal data processing professionals and HCSS experts to ensure that the same type of data that I had used in Docket No R87-1 would be available, in reliable form, from HCSS.
- (i) Did you participate in drafting the "Programming Specifications" that appear at pages 4-7 of WP-1? If so, please describe your participation and state the beginning and ending dates of your participation.
- (ii) What is meant by the statement, "This project will initially be independent of the HCSS system." (WP-1 at 4.)
- (iii) Please provide a copy (hard copy and diskette) of the program LAC990C1.PC referred to at page 4 of WP-1. How many versions of this program were tested at a single site before data were extracted at the 12 HCSS sites? At which HCSS site was the program tested? What "checks were made to ensure that the data were extracted correctly"?

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- (iv) Please provide copies (hard copy and diskette) of the programs actually used at each of the 12 HCSS sites to extract the variables required for your dataset
- (v) Please provide a copy (diskette) of the file LAC990D1.LST referred to at page 4 of WP-1.
- (vi) Please provide copies (diskettes) of the files actually generated at each of the 12 HCSS sites containing the variables required for your dataset and "sent to the St. Louis ISSC for collating into one file." State the dates on which each file was "sent to the St. Louis ISSC."
- (vii) Please provide a copy (diskette) of the collated file prepared at the "St. Louis ISSC [and] forwarded to Headquarters." State the dates on which this collated file was (a) completed and (b) received at Headquarters.
- (viii) Please provide a copy of the programming specifications and the actual code (hard copy and diskette) used for collating the data from 12 HCSS sites at the "St. Louis ISSC."
- (ix) Please describe the measures taken at the "St. Louis ISSC" and at Headquarters to maintain the integrity of the data extracted at the 12 HCSS sites.
- (x) Please state the number of records (observations, contract segments) in each of the following datasets: the extracted file produced at each HCSS site, the file for each HCSS site as received at the "St. Louis ISSC," the collated file produced at the "St. Louis ISSC," the collated file as received by Headquarters, and the collated file received by you.
- (xi) Is it your belief that no records (observations, contract segments) were lost, modified, or created during the process of being transferred from the 12 HCSS sites to the "St. Louis ISSC"? Please state the basis for your belief.
- (xii) Is it your belief that no records (observations, contract segments) were lost, modified, or created during the process of being collated at the "St. Louis ISSC"? Please state the basis for your belief.
- (xiii) Is it your belief that no records (observations, contract segments) were lost, modified, or created during the process of being transferred from the "St. Louis ISSC" to Headquarters? Please state the basis for your belief.

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- (xiv) Is it your belief that no records (observations, contract segments) were lost, modified, or created at any time during the process of being transferred from the 12 HCSS sites to your custody? Please state the basis for your belief.
- (xv) Is it your belief that no records (observations, contract segments) were accidentally deleted, modified, or created while in your custody? Please state the basis for your belief.

RESPONSE

a) Answered by witness Bradley.

b)(i) Answered by witness Bradley.

b)(ii) Answered by witness Bradley.

b)(iii) A diskette containing the code for program LAC990C1.PC referred to at page 4 of WP-1, written in C language, will be furnished in Library Reference H-217, Materials Provided in Response to OCA/USPS-T13-37, within several days. There were not different "versions" of the program. The program initially was prepared and then modified a few times before it was used. Since this was done approximately two years ago, the Postal Service does not recall the exact number or nature of the modifications made, other than the fact that they were not extensive. The program was reviewed initially at the St. Louis ISSC and subsequently tested by a contract specialist at the Seattle DNO. The program was designed to ensure accurate data extraction, to the extent possible. In addition, during its review of the program, the St. Louis ISSC tested it on its developmental data base, with actual data from a DNO.

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b)(iv) The program was created to be run at all 12 sites; in other words, it was not site-specific. A diskette containing the code for that program -- program LAC990C1.PC -- will be furnished in Library Reference H-217, Materials Provided in Response to OCA/USPS-T13-37, within several days.

b)(v) Such a file never actually existed. The program was coded to store the data from each of the 12 sites under 12 different file names.

b)(vi) Copies of the files generated by the 12 HCSS sites and sent to the St. Louis ISSC will be furnished on diskettes in Library Reference H-217, Materials Provided in Response to OCA/USPS-T13-37, within several days. To the extent any of those files contain dates, those dates would represent the last time the file was saved. The St. Louis ISSC did not maintain a record of when each file was received, but believes that most, if not all of them, would have been received within several days of when they were created or of the last time they were saved.

b)(vii) To the best of the Postal Service's recollection, diskettes containing the collated file prepared by the St. Louis ISSC were mailed to Headquarters, and those same diskettes were turned over to witness Bradley by Headquarters personnel. Copies of the diskettes given to witness Bradley will be furnished in Library Reference H-217, Materials Provided in Response



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to OCA/USPS-T13-37, within several days. To the extent the collated file contains a date, that date would represent the last time the file was saved. Records showing when the collated file was mailed to and received by Headquarters cannot be located, but presumably the events occurred shortly after the last time the file was saved.

b)(viii) There are no program specifications or code used for collating the data from the 12 HCSS sites. The St. Louis ISSC created the collated file by merging the 12 files from the HCSS sites in DOS.

b)(ix) The files from the 12 HCSS sites were merged in DOS. To the best of the Postal Service's knowledge, no data from the files was omitted or deleted during this process.

b)(x) To the best of the Postal Service's recollection, the "extracted file produced at each HCSS site" and "the file for each HCSS site received by the St. Louis ISSC are one and the same. To the best of the Postal Service's recollection, the collated file prepared by the St. Louis ISSC, the collated file prepared at Headquarters, and the collated file received by witness Bradley are one and the same. The OCA can compare the materials that will be furnished in Library Reference H-217, Materials Provided in Response to OCA/USPS-T13-37, within several days to perform a record count.

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b)(xi) Answered by witness Bradley.

b)(xii) Answered by witness Bradley.

b)(xiii) Answered by witness Bradley.

b)(xiv) Answered by witness Bradley.

b)(xv) Answered by witness Bradley.

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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