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

| POSTAL RATE AND FEE CHANGES, 1997 | Docket No. R97-1 |

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM UNITED STATE POSTAL SERVICE (OCA/USPS-4, 5 AND 6)

The United States Postal Service hereby provides the responses of witness Patelunas to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-4, 5 and 6, filed on July 16, 1997, and redirected from the Postal Service.
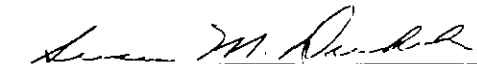
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 30, 1997

Answer of Richard Patelunas to the Interrogatories of
Office of the Consumer Advocate
to United States Postal Service
(Redirected from United States Postal Service)

OCA/USPS-4. The following interrogatory refers to Postal Service library
reference H7, data filename FY96mods.dat. Within the data file FY96mods.dat
there are non-numeric characters.

a.   Please confirm that each of the following characters found in the data file
converts to a numeric value as follows:

Character converts to	Numeric Value	Confirmed	Not Confirmed
"{"	0	_____	_____;
"A"	1	_____	_____;
"B"	2	_____	_____;
"C"	3	_____	_____;
"D"	4	_____	_____;
"E"	5	_____	_____;
"F"	6	_____	_____;
"G"	7	_____	_____;
"H"	8	_____	_____;
"I"	9	_____	_____;
"}"	-0	_____	_____;
"J"	-1	_____	_____;
"K"	-2	_____	_____;
"L"	-3	_____	_____;
"M"	-4	_____	_____;
"N"	-5	_____	_____;
"O"	-6	_____	_____;
"P"	-7	_____	_____;
"Q"	-8	_____	_____; and
"R"	-9	_____	_____.

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b.   For each conversion that was not confirmed in part "a" of this interrogatory,
please state the correct interpretation of each non-numeric character.

OCA/USPS-4 Response:

a. Not confirmed. It is not correct to think in terms of converting the

characters in the first column to the numeric values in the second column. The

positive sign associated with the first ten symbols should not be assumed, rather

the positive sign should be displayed. For example, the first character, "{", is

synonymous with "+0". Keeping these two points clearly in mind, the symbols

in the first column have the identical meaning as the numeric values in the

second column, as shown in part b below.

b. The positive sign should be displayed for the first ten characters, resulting

in the following:

"{"	+0
"A"	+1
"B"	+2
"C"	+3
"D"	+4
"E"	+5
"F"	+6
"G"	+7
"H"	+8
"I"	+9
"}"	-0
"J"	-1
"K"	-2
"L"	-3
"M"	-4

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OCA/USPS-4 Response continued:

"N"	-5
"O"	-6
"P"	-7
"Q"	-8
"R"	-9

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OCA/USPS-5. The following interrogatory refers to the Postal Service's Base Year data file format in USPS library reference H-7.

a.   Please explain why the Postal Service provides base year data (FY96mods.dat) that includes non-numeric data.

b.   Please explain why the Postal Service does not provide a base year data file containing only numeric characters.

OCA/USPS-5 Response:

a.   The fields that contain these characters are not "non-numeric". COBOL defines these fields as "signed numeric".

b.   See the response to part a of this question.

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OCA/USPS-6. Please identify the Postal Service library reference that provides the base year data file format specifications and any required character conversion algorithm. Include in your response section identifiers and page numbers as appropriate. If there is no such library reference, please provide one.

OCA/USPS-6 Response:

These base year data file format specifications can be found in Docket No. R94-1, USPS Library Reference G-5, Costs and Revenue Analysis / Roll Forward, Listings of Programs, Job Control Language, and Command Procedures, Section 20, page 4. As explained in the response to OCA/USPS-4, there is no "character conversion algorithm" to be documented because there is no conversion. Nonetheless, in an effort to further explain the representation of the characters, the Postal Service searched its COBOL manuals, but was not able to find documentation of the character definition. These data file format specifications and character meanings are the same that have been filed in previous rate cases in which the base year/rollforward model data files have been filed. The character interpretations described in question 4, part a are common knowledge to any casual user of COBOL and thus further documentation, if such even exists, is not necessary.
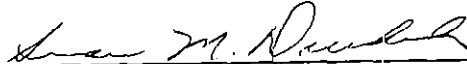
DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Dated: 7/30/97

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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