

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

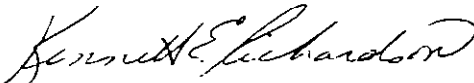
OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS CARL G. DEGEN  
(OCA/USPS-T12-21-25)  
August 4, 1997

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,

  
GAIL WILLETTE

Director  
Office of the Consumer Advocate



KENNETH E. RICHARDSON  
Attorney

OCA/USPS-T12-21. Please refer to the IOCS data set of LR-H-23. The variable F263 contains values of '333333', '444444', and '555555'.

- a. Please explain what each of the possible values for this variable represents.
- b. Please provide a citation to the portion of the H-23 documentation that explains the meaning of the possible values for this variable. If the values are not defined in H-23, please provide a reference to the appropriate library reference.

OCA/USPS-T12-22. Please refer to IOCS question 24, page 133 of H-49.

- a. Please confirm that the piece volumes by mail category and shape are not presented on the IOCS data file of library reference H-23. If you do not confirm, please identify the variables that contain the volume information collected on question 24. If you do confirm, please provide a file containing the volume data collected in IOCS question 24 that can be matched to individual IOCS H-23 records.
- b. Please confirm that at least one IOCS record is created to represent each of the categories of mail recorded in IOCS question 24. If you do not confirm, please explain.
- c. Please confirm that the volume data collected in IOCS question 24 is used to produce the IOCS weighting factors (variables F9246 and F9250, library reference H-23). If you do confirm, please provide formulas used to produce the weighting factors and a description of how each of the weighting factors should be used or interpreted. If you do not confirm, please explain why these volumes are not used for estimation purposes.

OCA/USPS-T12-23. Please refer to page 15 of library reference H-89. This page contains a table titled "FISCAL YEAR 1996 - UNWEIGHTED TALLIES AFTER ITEM DISTRIBUTION EXCLUDES GENERATED RECORDS."

- a. Please define the term "generated records."
- b. Please list every set of circumstances that can lead to these "generated records."
- c. Please confirm that counted item mixed-mail observations lead to "generated records." If you do not confirm, please explain. If you do confirm, please explain whether these are the only types of IOCS sample observations that lead to "generated records."

OCA/USPS-T12-24. Please refer to library reference H-23 and to page 133 of library reference H-49. Consider a hypothetical IOCS sample reading of a counted item.

- a. Please confirm that the number of categories of mail (F9227) is less than or equal to the number of IOCS records associated with this tally (e.g., one mail category can consist of mail of different shapes). If you do not confirm, please explain.
- b. Suppose the counted item contained First-Class nonpresorted letters and First-Class nonpresorted cards.
  - i. Please confirm that this observation would generate two IOCS records.
  - ii. Please confirm that both records would have the value of '1' for F9227.

- iii. Please confirm that one record would have activity code '1060' and the other would have activity code '1020'.

If you do not completely confirm, please explain and provide the correct values for F9227 and for the activity code.

OCA/USPS-T12-25. This interrogatory examines various activity codes that can result from an IOCS tally in which the sampled employee is handling an item. Please refer to library references H-23 and to H-49, pages 87-116.

- a. Please confirm that a countable mixed mail item tally (F9218='Y' and 'A'  $\leq$  F9214  $\leq$  'P') could receive an activity code corresponding to mixed mail (5300-5750). If you do confirm, please explain the circumstances that would lead to assignment of this code. If you do not confirm, please explain why this cannot occur.
- b. Please confirm that an identical mailing item tally (F9216='Y' and 'A'  $\leq$  F9214  $\leq$  'P') could receive an activity code corresponding to mixed mail (5300-5750). If you do confirm, please explain the circumstances that would lead to assignment of this code. If you do not confirm, please explain why this cannot occur.
- c. Please confirm that an item tally for which the top piece rule applies (F9217='Y' and 'A'  $\leq$  F9214  $\leq$  'P') could be assigned an activity code corresponding to mixed mail (5300-5750). If you do confirm, please explain the circumstances that would lead to assignment of this code. If you do not confirm, please explain why this cannot occur.

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.

A handwritten signature in cursive script, reading "Kenneth E. Richardson".

KENNETH E. RICHARDSON  
Attorney

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August 4, 1997