

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

RECEIVED
Aug 6 3 15 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

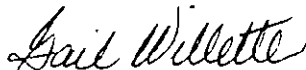
Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(OCA/USPS-T5-3-4)
August 6, 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-T5-3. The following interrogatory refers to Postal Service library reference H-6, subdirectory "PS410D01/FY96MODS" data file "I.DAT", USPS-T-5 workpapers A and B and USPS library reference H-9. In each of the following instances, the data file appears to disagree with the workpapers and the library reference cited in USPS-T-5 workpaper B. Please indicate which information is correct and provide corrected library references, workpapers, and a data file as appropriate. (Trailing zero's have been omitted from the data.)

- a. The Postal Service's library reference H-6, data file I.DAT, indicates that the segment 18, cost component 199, "Repriced Annual Leave" total "other" is "46,427." Both workpaper A at 80 and Postal Service library reference H-9 at 159 indicate that cost component 199 is "47,300." Please indicate what the correct amount is.
- b. The Postal Service's library reference H-6 data file I.DAT, indicates that the segment 18, cost component 200, "Holiday Leave Variance" total "other" is "2,650." Both workpaper A at 80 and Postal Service library reference H-9 at 157 indicate that cost component 200 is "2,700." Please indicate what the correct amount is.
- c. The Postal Service's library reference H-6 data file I.DAT, indicates that the segment 18, cost component 201, "CS Ret Fund Deficit Cur" total "other" is "223,898." Both workpaper A at 80 and Postal Service library reference H-9 at 159 indicate that cost component 201 is "228,108." Please indicate what the correct amount is.

- d. The Postal Service's library reference H-6 data file I.DAT, indicates that the segment 18, cost component 202, "CS Ret Fund Deficit Pri" total "other" is "408,080." Both workpaper A at 80 and Postal Service library reference H-9 at 159 indicate that cost component 202 is "928,521." Please indicate what the correct amount is.
- e. The Postal Service's library reference H-6 data file I.DAT, indicates that the segment 2, cost component 9, "Time & Attend Supervision" total "other" is "61,056." Both workpaper A at 6 and workpaper B-2, worksheet 2.0.1 column 9, line 4, indicate that cost component 9 is "62,231." Please indicate what the correct amount is.

OCA/USPS-T5-4. The following interrogatory refers to Postal Service library references H-6 and H-7. Both library references include diskettes. Library Reference H-6 states, "Eight computer tapes contain[] data files used in the Base Year / Roll-Forward To facilitate use of these tapes, printouts of the job control language (JCL) used to create the tapes, and associated processing messages are also provided. " Library Reference H-7 states "This library reference contains one diskette that includes the cost matrices for the following years:..."

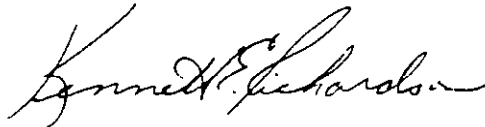
- a. Please explain why the data file I.DAT in library reference H-6, subdirectory "PS410D01/FY96MODS" differs from the data file FY96MODS.DAT provided in library reference H-7. Which data file I.DAT or FY96MODS.DAT is correct? If neither file is totally correct, please submitted a corrected data file.

- b. In library reference H-6, subdirectory "PS420D01/FY96MODS" there are three data files, A.DAT, B.DAT and C.DAT. Please explain the purpose of each data file.
- c. Please explain the difference between the data file FY97RCC.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY97RCC". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.
- d. Please explain the difference between the data file FY97RCM.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY97RCM". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.
- e. Please explain the difference between the data file FY97RCR.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY97RCR". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.
- f. Please explain the difference between the data file FY98RCA.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY98RCA". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.

- g. Please explain the difference between the data file FY98RCAM.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY98RCAM". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.
- h. Please explain the difference between the data file FY98RCB.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY98RCB". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.
- i. Please explain the difference between the data file FY98RCBM.DAT in library reference H-7 and the data files in library reference H-6, subdirectory "PS460D03/FY98RCBM". What data file accurately reflects the cost matrix data? If neither library reference contains a data file that accurately reflects the cost matrix data, please provide a corrected data file.

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

Washington, D.C. 20268-0001
August 6, 1997