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-T12-26-29)
August 8, 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

GAIL WILLETTE
Director
Office of the Consumer Advocate

Kenneth E. Richardson

KENNETH E. RICHARDSON
Attorney

OCA/USPS-T12-26. Please refer to line 01080001 of program MOD2ITEM, H-23. This line computes DOLLAR = WGT*KEY/KEYTOT.

a. Please confirm that this code subdivides the weight of a distributed item tally into weights for records created to match activity codes that exist for the distributed item's pool and item type. If you do not confirm, please explain.

b. Please confirm that the values for the variables KEY and KEYTOT were computed at lines 00830004 - 00940004 of program MOD1DIR. If you do not confirm, please explain and provide a citation to the program code that calculated these variables.

c. Please confirm that at line 00940004 of MOD1DIR, the variable KEYTOT represents the sum of KEY values for a given POOL/HANDLING combination. If you do not confirm, please explain the relationship between KEY and KEYTOT.

d. Please confirm that the values of KEY and KEYTOT include weight from observations deleted at line 00330001 of program MOD2ITEM. If you do not confirm, please explain.

e. Please confirm that after deleting observations at line 00330001 of program MOD2ITEM, the KEYTOT variable may no longer represent the sum of the KEY variable for POOL x HANDLING combinations that had observations deleted. If you do not confirm, please explain why deleting observations that contribute to a sum does not affect the sum.

f. Please confirm that less than 100 percent of the weight (or cost) of items is distributed whenever the values of KEY sum to less than KEYTOT for a particular POOL x HANDLING combination. If you do not confirm, please

explain. If you do confirm, please explain why this weight reduction was

necessary.

OCA/USPS-T-12-27. Please isolate the impact of the new mixed mail costing

methodology for CAG A-J clerk and mailhandlers by comparing the distributed mixed

mail costs for base year 1996 and CRA 1996.

OCA/USPS-T12-28. Please state the first year that IOCS data was collected on the

contents of containers and of items. Please provide all documents relating to studies

and tabulations for years since then that examine the effect of potential new mixed mail

methodologies on the clerk and mailhandler attributable cost distributions.

OCA/USPS-T12-29. Please refer to your response to OCA/USPS-T12-5a. Please

confirm that the MODS based cost pools used in your testimony are defined identically

to those used by witness Bradley to construct cost pool variability estimates. If you do

not confirm, please describe any differences. If you do confirm, please provide a

citation to witness Bradley's construction of MODS based cost pools.

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.

Kenneth E. Richardson

KENNETH E.RICHARDSON
Attorney

Washington, D.C. 20268-0001
August 9, 1997