

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-T12-30-32)
August 14, 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.

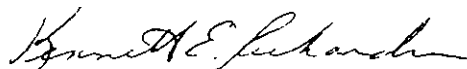
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

Attorney

OCA/USPS-T12-30. Please refer to the program MBC listings of library references H-146 and H-218. The SAS code at lines 00150002-00155003 of H-146 and SAS log lines 17-21 of H-218 appear to be slightly different versions of the KEEP option of the SET statement preceding it.

- a. Please confirm that the resulting BMC.BMC data set in program MBC of H-146 contains variables not contained in the BMC.BMC data set produced in H-218. If you do not confirm, please explain the absence of F226 and F266 from the H-218 data set.
- b. Please confirm that the resulting BMC.BMC data set in program MBC of H-146 does not contain some variables that are contained in the BMC.BMC data set produced in H-218. If you do not confirm, please explain the absence of F136 from the H-146 data set.
- c. Please confirm that the H-218 SAS programs are not identical to the SAS programs of H-146. If you do not confirm, please explain the differences in the KEEP option noted in parts a and b of this interrogatory. If you do confirm, please identify all modifications made to the original H-146 programs and explain why the modifications were made.

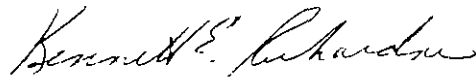
OCA/USPS-T12-31. Please refer to Attachment 1 to your response to OCA/USPS-T12-1. This table shows that about 94 percent of the non-MOD offices are CAG D-J offices and that only about 3 percent of the MODS offices are CAG D-J offices.

- a. Please confirm that the variability estimates you use to develop distributed volume variable costs by cost pool are based solely on MODS office data. If you do not confirm, please explain.
- b. Please confirm that you apply the MODS office variability figures of Table 4 of your testimony to produce volume variable costs for the Non-MODS offices. If you do not confirm, please explain fully.
- c. Please confirm that the total accrued clerk and mailhandler costs for Non-MODS offices is about four times that of the MODS offices. If you do not confirm, please provide the correct figures and explain.
- d. Please provide any and all justification for applying variabilities developed predominately for CAG A-C MODS offices to CAG D-J Non-MODS offices.
- e. Please provide copies of all studies and analyses relating to differences in mail processing volume variability between CAG A-C MODS offices and CAG D-J Non-MODS offices.
- f. Please confirm that the primary justification for the use of the MODS volume variability estimates in NON-MODS offices is the lack of analagous volume variability estimates for NON-MODS offices.

OCA/USPS-T12-32. Please refer to Table 4 of your testimony. Please provide a crosswalk between the cost pools provided here and the operation code by basic function as described in Appendix C of LR-H-1. For example, what cost pool(s) of Table 4 correspond to each combination of operation code and basic function as described on page 1 of Appendix C of LR-H-1.

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, appearing to read "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

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