

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS BRADLEY
(UPS/USPS-T14-4, -10)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS-T14-4, -10, filed on August 1, 1997, and redirected from witness Bradley. A partial objection to number 4 was filed on August 11, and the Postal Service does not waive that objection.

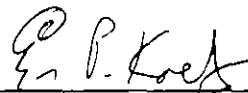
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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August 15, 1997

Response of United States Postal Service
to
Interrogatories of UPS
(Redirected from Witness Bradley)

UPS/USPS-T14-4.

- a. Please provide a descriptive list of all data available through MODS and PIRS.
- b. What are the qualitative differences between MODS and PIRS?
- c. How are the data that are available through both MODS and PIRS collected?
- d. What are the potential sources of collection or reporting error for (1) MODS and (2) PIRS?
- e. How is the data scrubbed or audited for (1) MODS and (2) PIRS?
- f. How are MODS and PIRS data processors trained?
- g. Please discuss the data quality of (1) MODS and (2) PIRS.

UPS/USPS-T14-4 Response:

- a. MODS data are available by operation number and labor distribution code.

MODS data include workhours, distribution volume and machine performance data. For a descriptive list of the MODS operation numbers and labor distribution codes, please see Exhibit USPS-14A. PIRS data are collected at Bulk Mail Centers and are available by processing activity. PIRS data include *workhours and distribution volumes*. Please see Library Reference H-148 at page H148-3 for a descriptive list of the activities recorded in PIRS.
- b. Because of the differences in the mix of operations in MODS offices and BMCs,

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the MODS and PIRS data will generally be for different activities. For example, MODS will contain detailed information on letter processing operations that will not be contained in PIRS. Given the required scope of each of the systems, however, the Postal Service does not believe that there are qualitative differences between MODS and PIRS. The Postal Service believes that both systems provide data that are reliable and consistent for operational purposes.

- c. Data in the MODS and PIRS system are collected locally, at the individual facilities, by technical personnel. Workhours in both MODS and PIRS are collected electronically from employee clock rings. Workload data, while different for MODS and PIRS for the reasons discussed in part b. above, are collected electronically from processing equipment and manually, in some instances.
- d. Collection or reporting errors for MODS and PIRS may be generated through human error. Problems with electronic equipment, if any, are more likely to cause reporting omissions than errors in the data that are reported.
- e. Although no formal "scrubs" are performed, the MODS and PIRS data are

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reviewed at Postal Service headquarters. For MODS data, anomalous values are identified and reported to the individual facilities involved for appropriate resolution.

- f. There are no "data processor" positions, as such. MODS and PIRS data are collected by on-site technical personnel. MODS and PIRS workload data are primarily collected electronically from processing equipment counts. Some data are entered into the MODS or PIRS systems manual, primarily for manual sorting operations. These data usually are entered by a technician who is individually trained at each site.

- g. The Postal Service believes that MODS and PIRS data are reliable and consistent for operational purposes. For example, as detailed by witness Moden, (USPS-T-4 at page 16) MODS data are used extensively by the Postal Service at the local, area and national levels.

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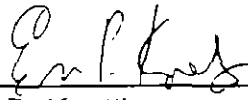
UPS/USPS-T14-10. Please explain the process by which a site is designated as a MODS facility or a PIRS facility. Please discuss any selection bias with respect to the sites chosen.

UPS/USPS-T14-10 Response:

All Processing and Distribution Centers, Processing and Distribution Facilities, Air Mail Centers and Air Mail Facilities are designated as MODS facilities. Due to organizational and technological changes over time, a limited number of additional locations report data through MODS. District and area management, along with operations support personnel at Postal Service headquarters, decide whether to designate these locations for inclusion in MODS. These locations includes some post offices, delivery units, and administrative units. All Bulk Mail Centers are included in PIRS. The Postal Service believes that there is no selection bias in MODS or PIRS because of all of the intended facilities are included.

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.



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