

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO PRESIDING OFFICER'S
INFORMATION REQUEST NO. 1, QUESTION 11
(August 20, 1997)

The United States Postal Service hereby provides a response to Presiding Officer's Information Request No. 1, question 11, issued on August 4, 1997. On August 18, 1997, the Postal Service filed responses to questions 1 through 10 and indicated that the response to question 11 would follow shortly.

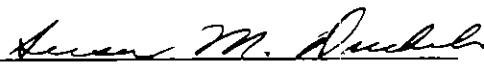
The question is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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August 20, 1997

Response of United States Postal Service
to
Presiding Officer's Information Request No. 1

POIR No. 1:

11. There appears to be unexplained differences between the Govadj and I-forms worksheets used as data inputs for Library Reference H-196 and those used for USPS-T-5, Workpaper B. For example, the entry in Worksheet 7.0.4.2 of USPS-T-2, Workpaper B, line 41, Column 11, is different than the entry for the same cell given in Library Reference H-196. Please explain why this difference exists. Also, please provide a hard copy of Worksheet 7.0.11, as referenced in Worksheet 7.0.4.2, lines 41-43, of USPS-T-5 of Workpaper B.

If there are other differences in the Govadj and I-forms worksheets used as data inputs for Library Reference H-196 and USPS-T-5, Workpaper B, please identify them and discuss the basis for them.

RESPONSE

The 1,205,200 shown in USPS-T-5, Workpaper B, W/S 7.0.4.2 is the correct amount to use. The source cited in USPS-T-5, Workpaper B, W/S 7.0.4.2 has been revised to USPS LR-H-232. The explanation of the change can be found in USPS Library Reference H-232, Materials Provided in Response to Presiding Officer's Information Request No. 1, Question 11. USPS-T-5, Workpaper B, W/S 7.0.4.2, lines 41-43 has been revised.

Four city carrier files in Library Reference H-196 I-Forms differ from those filed as the I-Forms in the workpapers of Witness Alexandrovich, USPS-T-5 Witness Alexandrovich's I-Forms reflect the new treatment of Express Mail Routes on the street and this is also shown in his Workpaper-C1. The four city carrier files are:

ALA860P13	City Carrier Cost - Rt: 71-86,99,87-98
ALA860P15	City Carrier Cost - All Routes
ALB716P8	City Carriers - Summary Operation Codes
ALB718P7	City Carriers - All Crafts Combined TABC

Response of United States Postal Service
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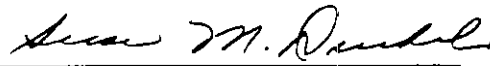
The I-Forms files, NONBMC_MP (Direct Tallies Premium Pay - NONBMC_MP) and PLATFORM (Direct Mail Processing - Night/Sunday), differ between Library Reference H-196 and the workpapers of Witness Alexandrovich because Witness Alexandrovich incorporates the new Mail Processing Volume Variability methodology.

Likewise, the I-Forms factors for the variabilities of Special Delivery Messengers, Window Service and Vehicle Service Drivers are different between Library Reference H-196 and Witness Alexandrovich because different methodologies are used

There are no differences between the Govadj worksheets in Library Reference H-196 and Witness Alexandrovich's workpapers.

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.



Susan M. Duchek

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August 20, 1997