

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 WITNESS PATELUNAS TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS ALEXANDROVICH
(OCA/USPS-T5-3 AND 4)

The United States Postal Service hereby provides responses of witness Patelunas to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T5-3 and 4, filed on August 6, 1997, and redirected from witness Alexandrovich.

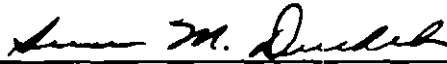
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 20, 1997

Response of United States Postal Service Witness Patelunas
to
Interrogatories of
Office of the Consumer Advocate
(Redirected from Witness Alexandrovich USPS-T-5)

OCA/USPS-T5-3. *The following interrogatory refers to Postal Service library reference H-6, subdirectory "PS410DOI/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.

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OCA/USPS-T5-3 Response:

There are two attachments that accompany this response. Attachment I is a list of all the directories, subdirectories and file names found in Library Reference H-6.

OCA/USPS-T5-3 Response continued:

Columns A through E are the subdirectories and Columns F through O are the file names. File name \ps410d01\fy96mods\ contains the base year file i.dat. File name \ps420d01\fy96mods\ contains the base year file names a.dat, b.dat and d.dat. File name \ps460d03\ contains all of the rollforward files.

Attachment II is a flowchart detailing how the files are used from Base Year 1996 to Fiscal Year 1997 Before the Volume and Workyear Mix Adjustments. The Base Year 1996 B Workpapers are the source of the Manual Inputs used in the I File. Distributing the volume variable less PESSA costs produces the A File. The A File is then the input for the B File in which the PESSA costs are distributed and the D Report, which contains the Final Adjustments, follows the B File.

The A File is also the input matrix to the next rollforward year. The C1 through C6 Files are each of the discreet adjustments in the rollforward model. These are then summed into the TY File and it is similar to the A File in the base year. The TY File is used as the input to the B File and the TY File is also the input to the next rollforward year.

A more detailed explanation of these steps can be found in the testimony of Witness Patelunas, USPS-T-15, pages 6-15. The technical explanation is available in

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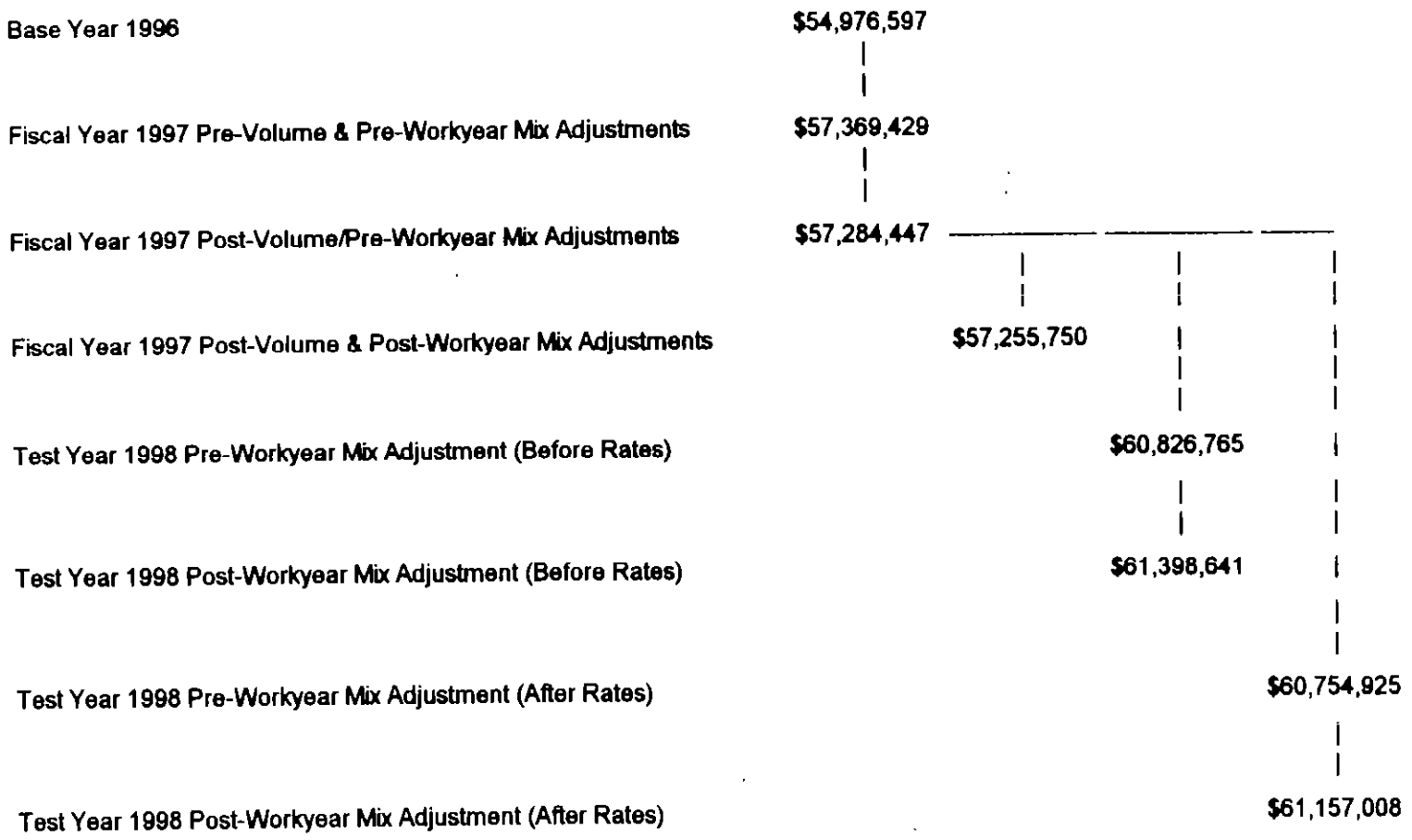
the following **library** references: Docket No. R94-1, LR-G-5, Costs and Revenue/RollForward, Listings of Programs, Job Control Language, and Command Procedures and Docket No. R97-1, LR-H-5, Cost and Revenue Analysis, Roll Forward, Processing Documentation.

Response a-e:

All of the amounts cited to USPS-T-5, Workpaper A and USPS Library Reference H-9 are correct. All of the amounts cited to USPS Library Reference H-6 cannot be found in file I.DAT. All of the relevant amounts in I.DAT match the Workpaper A and USPS Library Reference H-9 amounts. After browsing the files in an effort to clear-up the confusion, all the amounts cited to I.DAT were found in B.DAT. The original source CD ROM that was provided as USPS Library Reference should be reviewed for the amounts in I.DAT; it is possible that a copy made from the CD ROM has been mislabeled.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	aldran														
2	 =>	lth-6													
3		 =>	alahqn												
4			 =>	ps410d01											
5			 =>	fy96mods	i.dat										
6			 =>	ps420d01											
7			 =>	fy96mods	a.dat	b.dat	d.dat								
8			 =>	ps460d03											
9				 =>	fy97rcc	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat
10				 =>	fy97rcm	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat
11				 =>	fy97rcr	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat
12				 =>	fy98rca	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat
13				 =>	fy98rcam	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat
14				 =>	fy98rcb	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat
15				 =>	fy98rcbm	b.dat	c1.dat	c2.dat	c3.dat	c4.dat	c5.dat	c6.dat	d.dat	sum.dat	ty.dat

Rollforward Flowchart



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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 / RollForward 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 "PS410DO1/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 "PS420DO1/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 "PS46OD03/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 "PS46OD03/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 "PS46OD03/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 "PS46OD03/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.

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- 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 "PS46OD03/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 "PS46OD03/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 "PS46OD03/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.

OCA/USPS-T5-4 Response:

For each of these responses, please refer to Attachments I and II to the response to OCA/USPS-T5-3 for further assistance.

- a. The I.DAT in Library Reference H-6 is the I File in Base Year 1996 and the FY96MODS.DAT file is the D File in Base Year 1996. Both files are correct.
- b. There is no C.DAT File; it is assumed that this should be D.DAT. The explanation provided at the beginning of the response to part a of OCA/USPS-T5-3 and the two attachments to that response explain the purpose of each data file.
- c-i. The files found in Library Reference H-7 are the D Files for each of the years listed. The two attachments to the response to OCA/USPS-T5-3 describe the files contained in Library Reference H-6. The two attachments and the explanation at the

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beginning of that response provide the detail necessary to understand the different files. All the files reflect the cost matrices that they are intended to reflect.

DECLARATION

I, Richard Patelnas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Richard Patelnas

Dated: 8/20/97

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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