

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 THOMAS W. HARAUSH
(OCA/USPS-T3-1-4)
August 28, 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-T3-1. Please refer to page 21 of library reference H-89. The "Data Recoding" section states that counts of third-class single piece increased substantially for PQ 4, and consequently that some third-class single piece mail was recoded as third-class bulk rate regular for the city carrier system.

- a. Could the recoding affect the proportion of single subclass stops for third-class single piece or for other subclasses? Please explain.
- b. Please provide a count of the third-class single piece mail that was recoded to third-class bulk rate regular. Please provide this both as a weighted and unweighted count.
- c. Please provide more detail on how the recoding was performed.
- d. Please explain why it was necessary to perform this recoding of third-class single piece mail for the city carrier system.
- e. Please explain why the volume for third-class single piece mail increased substantially on city carrier routes after July 1, 1996.
- f. Has the CODES data collection software been changed since July 1, 1996 to correct the problem of having too much third-class single piece volume on city carrier routes? If so, please explain what changes were necessary. If not, will random data recoding continue in the future?
- g. How was it determined that the PQ 4 FY 1995 third-class city carrier volumes were more accurate than those from the PQ 4 FY 1996 volumes? For example, is it possible that the FY 1996 PQ 4 third-class single piece estimates were correct (before recoding) and that there were inaccuracies in the analogous FY 1995 PQ 4 estimates? Please explain.

OCA/USPS-T3-2. Please refer to page 25 of library reference H-89. The "Data Recoding" section states that counts of third-class single piece increased substantially for PQ 4, and consequently that some third-class single piece mail was recoded as third-class bulk rate regular for the rural carrier system.

- a. Please provide a count of the third-class single piece mail that was recoded to third-class bulk rate regular. Please provide this both as a weighted and unweighted count.
- b. Please provide more detail on how the recoding was performed.
- c. Please explain why it was necessary to perform this recoding of third-class single piece mail for the rural carrier system.
- d. Please explain why the volume for third-class single piece mail increased substantially on rural carrier routes after July 1, 1996.
- e. Has the CODES data collection software been changed since July 1, 1996 to correct the problem of having too much third-class single piece volume on rural carrier routes? If so, please explain what changes were necessary. If not, will random data recoding continue in the future?
- f. How was it determined that the PQ 4 FY 1995 third-class rural carrier volumes were more accurate than those from the PQ 4 FY 1996 volumes? For example, is it possible that the FY 1996 PQ 4 third-class single piece estimates were correct (before recoding) and that there were inaccuracies in the analogous FY 1995 PQ 4 estimates? Please explain.

OCA/USPS-T3-3. To what extent has random recoding of recorded subclass been utilized in other Postal Service data collection systems over the last 10 years? Please list each occurrence and provide the justification for the use of random recoding.

OCA/USPS-T3-4. Please refer to Table 4 of your testimony. This shows that 0.00080 of the single delivery residential (SDR) volume is special fourth class rate and 0.00036 of it is library rate.

- a. Please confirm that the ratio of special fourth class rate to library rate volume is approximately 2.2 for city carrier SDR delivered mail.
- b. Please refer to Table 2 of USPS-T-1. This table provides the FY 1996 volume estimate for special fourth class rate (189,793) and for library rate (30,133).
Please confirm that the ratio of special fourth class rate to library rate volume is approximately 6.3 for national volume estimates.
- c. Please confirm that the proportion of special fourth class rate volume relative to library rate volume is substantially smaller for SDR city carrier volume than for national volumes.
- d. Please explain why the city carrier special fourth class rate and the library rate pieces could not have been randomly recoded to agree proportionally with the known national volumes.

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 black ink, appearing to read "Kenneth E. Richardson". The signature is fluid and cursive, with a large initial "K" and "R".

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
August 28, 1997