## BEFORE THE RECEIVED POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 AUG 28 3 10 PM '97

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

## OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY TO UNITED STATES POSTAL SERVICE WITNESS CARL G. DEGEN (OCA/USPS-T12-39) 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-T12-39. Please refer to pages 21 and 25 of library reference H-89. These pages describe data recoding that was performed for the city and rural carrier systems because of implementation of MC95-1 rate categories on July 1, 1996. Some third-class single piece mail was randomly recoded as third-class bulk rate to achieve consistency between PQ 4 volumes for FY 1995 and FY 1996.

- a. Please explain whether it was necessary to randomly recode any of the IOCS tally activity codes to adjust for implementation of the MC95-1 rate categories.
- Please explain whether it was necessary to randomly recode any of the IOCS
  data to adjust it to conform with data from other sources or with IOCS data for
  other time periods.
- If any random recoding process was implemented, please describe completely.
  Include the specific rules for random recoding, the programs used to randomly recode the data, the number of tallies affected by recoding, and the justification for the recoding used.
- d. If random recoding was not used, please explain why it was not needed to account for the changes implemented with the MC95-1 rate categories.

## 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.

KENNETH E. RICHARDSON Attorney

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