

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 CARL G. DEGEN
(OCA/USPS-T12-56-62)
September 11, 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-T12-56. Please refer to Attachment 1 to your response to NAA/USPS-T12-2. Please provide a breakout of Attachment 1 separately for the larger and smaller MODS and non-MODS offices, where "larger" and "smaller" are defined as in the response to OCA/USPS-T12-31d.

OCA/USPS-T12-57. Please refer to Attachments 3, 5, and 8 to your response to OCA/USPS-T12-1. These contain tables showing compensation of clerks and mailhandlers by office group, craft and CAG, MODS and Non-MODS offices.

Attachment 3 contains information for all offices, Attachment 5 contains information for offices not in the IOCS sample, and Attachment 8 contains information for offices included in the IOCS sample.

- a. Please explain why Attachment 3 contains compensation data for CAG H/J Non-MODS offices, but this data is not available for Attachments 5 and 8.
- b. Please explain why the column titled "CAG H/J" is not separated into two columns, one for CAG H and one for CAG J.

OCA/USPS-T12-58. Please refer to Attachment 4 to OCA/USPS-T12-1. Please explain why some of the CAG A and B facilities not included in IOCS are shown to have an average complement of zero clerks and mailhandlers.

OCA/USPS-T12-59. Please refer to your response to OCA/USPS-T12-3b. This response stated that a correction to a variability figure could be incorporated into your Table 5 by applying the ratio of the new variability to the old variability to all entries in a

column. Please consider the implications to all other programs and outputs of library reference H-146.

- a. Please confirm that in order to update all relevant portions of H-146 to correspond to corrections to variabilities listed in your Table 4, only the following programs may need to be modified: MOD4DIST, NONMOD4, BMC4, PREMITOT, PIGGYF96, and NONMODEL. If you do not confirm, please list all programs that would need to be modified.
- b. Please refer to Attachment 1 to this interrogatory. Please confirm that Attachment 1 displays all lines of SAS code that would require modification in order to implement corrections or modifications to the variabilities listed in your Table 4. If you do not confirm, please provide a corrected list of affected program lines.
- c. Please list (by page number of H-146) all outputs of the H-146 SAS programs that would be expected to change if a modified set of variability estimates were used, instead of the set contained in your Table 4.
- d. Please provide a list of all outputs generated by H-146 that serve as inputs to Postal Service witness Alexandrovich's testimony. Please indicate which items on this list would be affected by a correction or modification to the variability estimates contained in your Table 4.
- e. Are there other versions of the H-146 programs that are more easily modified to account for future changes to either the variability levels or the total cost pool dollars? (For example, all variability figures and their cost pool names could be centrally located in one small data file, then the programs listed in part a of this

interrogatory could pick up variabilities from the variability file.) If so, please provide those programs. If not, will all adjustments to the WGT variable for MODS offices and modifications to variability estimates be manually changed in the H-146 programs in the future? Please explain.

OCA/USPS-T12-60. Please refer to the response to DMA/USPS-T4-38. In his response, witness Moden states, "I am not aware of any operational data on automated, mechanized or manual volumes by sub-class, but it is my understanding that such estimates could be derived from the In Office Cost System."

- a. Please explain how such volume estimates can be produced from the In Office Cost System.
- b. Please provide from the IOCS the estimates requested by DMA.
- c. Please list all other volume estimates that can be produced from the In Office Cost System.

OCA/USPS-T12-61. Please refer to the response to DMA/USPS-T4-27. This response states that witness Alexandrovich's Workpaper A-2 performs the premium pay adjustment and distributes the volume variable night shift differential and Sunday premium pay to "pref mail" or to all classes depending on whether the premium pay was for nonplatform or platform work. In response to DMA/USPS-T4-37, witness Alexandrovich states that the distribution keys for premium pay are developed in part V of H-146.

- a. Please describe the process used to redistribute premium pay.
- b. Please provide formulas describing the distribution keys developed in H-146 for use in distributing premium pay.

OCA/USPS-T12-62. In response to DMA/USPS-T4-27, witness Alexandrovich explains how the volume variable night shift differential and Sunday premium pay at non-BMCs are redistributed. He goes on to state in response to DMA/USPS-T4-29 that "the Postal Service is satisfied that the peak load cost adjustment (or premium pay adjustment) is appropriate."

- a. Please explain the distinction between volume variable and nonvolume variable premium pay.
- b. Please explain why any portion of premium pay should not be volume variable.
- c. Please explain why any portion of peak load cost should not be volume variable.

DOLLAR = WGT*31344/32468; VARB= .797 ; END;	01210004
IF POOL = 'INTL ' THEN DO;V='18';	01220004
DOLLAR = WGT*110273/133563; VARB= .786 ; END;	01230004
IF POOL = 'LD15 ' THEN DO;V='15';	01240004
DOLLAR = WGT*382393/12949; VARB=1.003 ; END;	01250004
IF POOL = 'LD41 ' THEN DO;V='41';	01260004
DOLLAR = WGT*18542/24946; VARB= .910 ; END;	01270004
IF POOL = 'LD42 ' THEN DO;V='42';	01280004
DOLLAR = WGT*2139/9972; VARB= .910 ; END;	01290004
IF POOL = 'LD43 ' THEN DO;V='43';	01300004
DOLLAR = WGT*521570/585351; VARB= .820 ; END;	01310004
IF POOL = 'LD44 ' THEN DO;V='44';	01320004
DOLLAR = WGT*126758/132750; VARB= .820 ; END;	01330004
IF POOL = 'LD48 EXP' THEN DO;V='48';	01340004
DOLLAR = WGT*3203/4571; VARB= .450 ; END;	01350004
IF POOL = 'LD48 OTH' THEN DO;V='48';	01360004
DOLLAR = WGT*127532/125245; VARB= .153 ; END;	01370004
IF POOL = 'LD48_SSV' THEN DO;V='48';	01380004
DOLLAR = WGT*106486/99502; VARB= .153 ; END;	01390004
IF POOL = 'LD48_ADM' THEN DO;V='48';	01400004
DOLLAR = WGT*148358/162622; VARB= .000 ; END;	01410004
IF POOL = 'LD49 ' THEN DO;V='49';	01420004
DOLLAR = WGT*252327/268214; VARB= .910 ; END;	01430004
IF POOL = 'LD79 ' THEN DO;V='79';	01440004
DOLLAR = WGT*134835/141401; VARB= .730 ; END;	01450004
IF POOL = 'MAILGRAM' THEN DO;V='18';	01460004
DOLLAR = WGT*368/519; VARB= .797 ; END;	01470004
IF POOL = 'REGISTRY' THEN DO;V='18';	01480004
DOLLAR = WGT*126948/143801; VARB= .153 ; END;	01490004
IF POOL = 'REWRAP ' THEN DO;V='18';	01500004
DOLLAR = WGT*15579/14164; VARB= .786 ; END;	01510004
IF POOL = '1BULK PR' THEN DO;V='17';	01520004
DOLLAR = WGT*11667/16345; VARB= .726 ; END;	01530004
IF POOL = '1CANCMP' THEN DO;V=17;	01540004
DOLLAR = WGT*287699/316230; VARB= .654 ; END;	01550004
IF POOL = '1EEQMT ' THEN DO;V=18;	01560004
DOLLAR = WGT*49885/41780; VARB= .786 ; END;	01570004
IF POOL = '1MISC ' THEN DO;V=18;	01580004
DOLLAR = WGT*130709/113407; VARB= .786 ; END;	01590004
IF POOL = '10PBULK ' THEN DO;V=17;	01600004
DOLLAR = WGT*315068/272917; VARB= .741 ; END;	01610004
IF POOL = '10PPREF ' THEN DO;V=17;	01620004
DOLLAR = WGT*745409/706228; VARB= .720 ; END;	01630004
IF POOL = '1PLATFRM' THEN DO;V=17;	01640004
DOLLAR = WGT*891539/889750; VARB= .726 ; END;	01650004
IF POOL = '1POUCHNG' THEN DO;V=17;	01660004
DOLLAR = WGT*437919/427410; VARB= .829 ; END;	01670004
IF POOL = '1SACKS_H' THEN DO;V=17;	01680004
DOLLAR = WGT*169234/152452; VARB= .526 ; END;	01690004
IF POOL = '1SACKS_M' THEN DO;V=17;	01700004
DOLLAR = WGT*47771/49216; VARB= .991 ; END;	01710004

IF POOL = 'LD48 EXP' THEN DO;V='48';	00600040
DOLLAR = WGT*3203/4571; VARB= .450 ; END;	00610040
IF POOL = 'LD48 OTH' THEN DO;V='48';	00620040
DOLLAR = WGT*127532/125245; VARB= .153 ; END;	00630040
IF POOL = 'LD48_SSV' THEN DO;V='48';	00640040
DOLLAR = WGT*106486/99502; VARB= .153 ; END;	00650040
IF POOL = 'LD48_ADM' THEN DO;V='48';	00660040
DOLLAR = WGT*148358/162622; VARB= .000 ; END;	00670040
IF POOL = 'LD49 ' THEN DO;V='49';	00680040
DOLLAR = WGT*252327/268214; VARB= .910 ; END;	00690040
IF POOL = 'LD79 ' THEN DO;V='79';	00700040
DOLLAR = WGT*134835/141401; VARB= .730 ; END;	00710040
IF POOL = 'MAILGRAM' THEN DO;V='18';	00720040
DOLLAR = WGT*368/519; VARB= .797 ; END;	00730040
IF POOL = 'REGISTRY' THEN DO;V='18';	00740040
DOLLAR = WGT*126948/143801; VARB= .153 ; END;	00750040
IF POOL = 'REWRAP ' THEN DO;V='18';	00760040
DOLLAR = WGT*15579/14164; VARB= .786 ; END;	00770040
IF POOL = '1BULK PR' THEN DO;V='17';	00780040
DOLLAR = WGT*11667/16345; VARB= .726 ; END;	00790040
IF POOL = '1CANCMP' THEN DO;V=17;	00800040
DOLLAR = WGT*287699/316230; VARB= .654 ; END;	00810040
IF POOL = '1EEQMT ' THEN DO;V=18;	00820040
DOLLAR = WGT*49885/41780; VARB= .786 ; END;	00830040
IF POOL = '1MISC ' THEN DO;V=18;	00840040
DOLLAR = WGT*130709/113407; VARB= .786 ; END;	00850040
IF POOL = '10PBULK ' THEN DO;V=17;	00860040
DOLLAR = WGT*315068/272917; VARB= .741 ; END;	00870040
IF POOL = '10PPREF ' THEN DO;V=17;	00880040
DOLLAR = WGT*745409/706228; VARB= .720 ; END;	00890040
IF POOL = '1PLATFRM' THEN DO;V=17;	00900040
DOLLAR = WGT*891539/889750; VARB= .726 ; END;	00910040
IF POOL = '1POUCHNG' THEN DO;V=17;	00920040
DOLLAR = WGT*437919/427410; VARB= .829 ; END;	00930040
IF POOL = '1SACKS_H' THEN DO;V=17;	00940040
DOLLAR = WGT*169234/152452; VARB= .526 ; END;	00950040
IF POOL = '1SACKS_M' THEN DO;V=17;	00960040
DOLLAR = WGT*47771/49216; VARB= .991 ; END;	00970040
IF POOL = '1SCAN ' THEN DO;V=17;	00980040
DOLLAR = WGT*58034/61843; VARB= .829 ; END;	00990040
IF POOL = '1SUPPORT' THEN DO;V=18;	01000040
DOLLAR = WGT*137232/183611; VARB= .786 ; END;	01010040
IF POOL = '1SUP OTH' THEN DO;V='18';	01020040
DOLLAR = 0; VARB= .786 ; END;	01030040
	01040040
IF POOL = 'NMO ' THEN VCOSTS=DOLLAR*.67;	02130040
IF POOL = 'PSM ' THEN VCOSTS=DOLLAR*.90;	02140040
IF POOL = 'SPB ' THEN VCOSTS=DOLLAR*.73;	02150040
IF POOL = 'SSM ' THEN VCOSTS=DOLLAR*.99;	02160040

DOLLAR = WGT*126758/132750; VARB= .820 ; END;	00440024
IF POOL = 'LD48 EXP' THEN D0;V='48';	00450024
DOLLAR = WGT*3203/4571; VARB= .450 ; END;	00460024
IF POOL = 'LD48 OTH' THEN D0;V='48';	00470024
DOLLAR = WGT*127532/125245; VARB= .153 ; END;	00480024
IF POOL = 'LD48_SSV' THEN D0;V='48';	00490024
DOLLAR = WGT*106486/99502; VARB= .153 ; END;	00500024
IF POOL = 'LD48_ADM' THEN D0;V='48';	00510024
DOLLAR = WGT*148358/162622; VARB= .000 ; END;	00520024
IF POOL = 'LD49 ' THEN D0;V='49';	00530024
DOLLAR = WGT*252327/268214; VARB= .910 ; END;	00540024
IF POOL = 'LD79 ' THEN D0;V='79';	00550024
DOLLAR = WGT*134835/141401; VARB= .730 ; END;	00560024
IF POOL = 'MAILGRAM' THEN D0;V='18';	00570024
DOLLAR = WGT*368/519; VARB= .797 ; END;	00580024
IF POOL = 'REGISTRY' THEN D0;V='18';	00590024
DOLLAR = WGT*126948/143801; VARB= .153 ; END;	00600024
IF POOL = 'REWRAP ' THEN D0;V='18';	00610024
DOLLAR = WGT*15579/14164; VARB= .786 ; END;	00620024
IF POOL = '1BULK PR' THEN D0;V='17';	00630024
DOLLAR = WGT*11667/16345; VARB= .726 ; END;	00640024
IF POOL = '1CANCMP' THEN D0;V=17;	00650024
DOLLAR = WGT*287699/316230; VARB= .654 ; END;	00660024
IF POOL = '1EEQMT ' THEN D0;V=18;	00670024
DOLLAR = WGT*49885/41780; VARB= .786 ; END;	00680024
IF POOL = '1MISC ' THEN D0;V=18;	00690024
DOLLAR = WGT*130709/113407; VARB= .786 ; END;	00700024
IF POOL = '10PBULK ' THEN D0;V=17;	00710024
DOLLAR = WGT*315068/272917; VARB= .741 ; END;	00720024
IF POOL = '10PPREF ' THEN D0;V=17;	00730024
DOLLAR = WGT*745409/706228; VARB= .720 ; END;	00740024
IF POOL = '1PLATFRM' THEN D0;V=17;	00750024
DOLLAR = WGT*891539/889750; VARB= .726 ; END;	00760024
IF POOL = '1POUCHNG' THEN D0;V=17;	00770024
DOLLAR = WGT*437919/427410; VARB= .829 ; END;	00780024
IF POOL = '1SACKS_H' THEN D0;V=17;	00790024
DOLLAR = WGT*169234/152452; VARB= .526 ; END;	00800024
IF POOL = '1SACKS_M' THEN D0;V=17;	00810024
DOLLAR = WGT*47771/49216; VARB= .991 ; END;	00820024
IF POOL = '1SCAN ' THEN D0;V=17;	00830024
DOLLAR = WGT*58034/61843; VARB= .829 ; END;	00840024
IF POOL = '1SUPPORT' THEN D0;V=18;	00850024
DOLLAR = WGT*137232/183611; VARB= .786 ; END;	00860024
IF POOL = '1SUP OTH' THEN D0;V='18';	00870024
DOLLAR = 0; VARB= .786 ; END;	00880024
IF POOL = 'NMO ' THEN VCOSTS=DOLLAR*.67;	01980024
IF POOL = 'PSM ' THEN VCOSTS=DOLLAR*.90;	01990024
IF POOL = 'SPB ' THEN VCOSTS=DOLLAR*.73;	02000024

IF POOL = 'LD15	' THEN DO;V='15';	04670001
	DOLLARS = 382392; VARB=1.003 ; END;	04680001
IF POOL = 'LD41	' THEN DO;V='41';	04690001
	DOLLARS = 18542; VARB= .910 ; END;	04700001
IF POOL = 'LD42	' THEN DO;V='42';	04710001
	DOLLARS = 2139; VARB= .910 ; END;	04720001
IF POOL = 'LD43	' THEN DO;V='43';	04730001
	DOLLARS = 521570; VARB= .820 ; END;	04740001
IF POOL = 'LD44	' THEN DO;V='44';	04750001
	DOLLARS = 126758; VARB= .820 ; END;	04760001
IF POOL = 'LD48 EXP'	THEN DO;V='48';	04770001
	DOLLARS = 3203; VARB= .450 ; END;	04780001
IF POOL = 'LD48 OTH'	THEN DO;V='48';	04790001
	DOLLARS = 127532; VARB= .153 ; END;	04800001
IF POOL = 'LD48_SSV'	THEN DO;V='48';	04810001
	DOLLARS = 106486; VARB= .153 ; END;	04820001
IF POOL = 'LD48_ADM'	THEN DO;V='48';	04830001
	DOLLARS = 148358; VARB= .000 ; END;	04840001
IF POOL = 'LD49	' THEN DO;V='49';	04850001
	DOLLARS = 252327; VARB= .910 ; END;	04860001
IF POOL = 'LD79	' THEN DO;V='79';	04870001
	DOLLARS = 134835; VARB= .730 ; END;	04880001
IF POOL = 'MAILGRAM'	THEN DO;V='18';	04890001
	DOLLARS = 368; VARB= .797 ; END;	04900001
IF POOL = 'REGISTRY'	THEN DO;V='18';	04910001
	DOLLARS = 126948; VARB= .153 ; END;	04920001
IF POOL = 'REWRAP	' THEN DO;V='18';	04930001
	DOLLARS = 15579; VARB= .786 ; END;	04940001
IF POOL = '1BULK PR'	THEN DO;V='17';	04950001
	DOLLARS = 11667; VARB= .726 ; END;	04960001
IF POOL = '1CANCMP'	THEN DO;V=17;	04970001
	DOLLARS = 287698; VARB= .654 ; END;	04980001
IF POOL = '1EEQMT	' THEN DO;V=18;	04990001
	DOLLARS = 49885; VARB= .786 ; END;	05000001
IF POOL = '1MISC	' THEN DO;V=18;	05010001
	DOLLARS = 130709; VARB= .786 ; END;	05020001
IF POOL = '1OPBULK	' THEN DO;V=17;	05030001
	DOLLARS = 315068; VARB= .741 ; END;	05040001
IF POOL = '1OPREF	' THEN DO;V=17;	05050001
	DOLLARS = 745409; VARB= .720 ; END;	05060001
IF POOL = '1PLATFRM'	THEN DO;V=17;	05070001
	DOLLARS = 891539; VARB= .726 ; END;	05080001
IF POOL = '1POUCHNG'	THEN DO;V=17;	05090001
	DOLLARS = 437919; VARB= .829 ; END;	05100001
IF POOL = '1SACKS_H'	THEN DO;V=17;	05110001
	DOLLARS = 169234; VARB= .526 ; END;	05120001
IF POOL = '1SACKS_M'	THEN DO;V=13;	05130001
	DOLLARS = 47771; VARB= .991 ; END;	05140001
IF POOL = '1SCAN	' THEN DO;V=17;	05150001
	DOLLARS = 58033; VARB= .829 ; END;	05160001
IF POOL = '1SUPPORT'	THEN DO;V=18;	05170001

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          DOLLARS = 137232; VARB= .786 ; END;      05180001
IF POOL = '1SUP OTH' THEN DO;V='18';           05190001
          DOLLARS =      0; VARB= .786 ; END;      05200001
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>>>>>>>>>>>>>>>>>> program name: bmc4>>

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IF POOL = 'NMO'      ' THEN VARB= .67;          02380002
IF POOL = 'PSM'      ' THEN VARB= .90;          02390002
IF POOL = 'SPB'      ' THEN VARB= .73;          02400002
IF POOL = 'SSM'      ' THEN VARB= .99;          02410002
IF POOL = 'PLA'      ' THEN VARB= .53;          02420002
IF POOL = 'OTHR'     ' THEN VARB= .54;          02430002
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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 cursive script that reads "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
September 11, 1997