

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

RECEIVED  
SEP 11 5 00 PM '97

POSTAL RATE AND FEE CHANGES, 1997

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS NIETO TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T2-1)

The United States Postal Service hereby provides the response of witness Nieto to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T2-1, filed on August 28, 1997.


The interrogatory 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

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2970; Fax -5402  
September 11, 1997

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T2-1. 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.

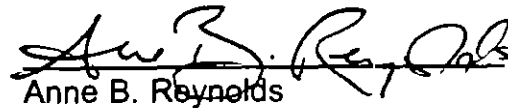
- a. Please explain whether it was necessary to randomly recode any of the TRACS data to adjust for implementation of the MC95-1 rate categories.
- b. Please explain whether it was necessary to randomly recode any of the TRACS data to adjust it to conform with data from other sources or with TRACS data for other time periods.
- c. 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.

Response:

- a. No, it was not necessary to randomly recode any TRACS data to adjust for implementation of MC95-1 rate categories.
- b. No changes were made to the TRACS data to make it conform to data from any other data system or to TRACS data from any other time period.
- c. No random recoding was performed.
- d. There were no data problems in the TRACS data that would necessitate random recoding.

## 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.

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
September 11, 1997