

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 PAFFORD TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T1-1)

The United States Postal Service hereby provides the response of witness Pafford to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T1-1, filed on August 28, 1997.

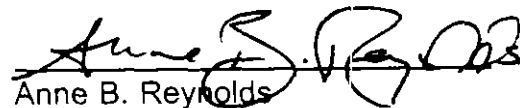
The interrogatory is stated verbatim and is followed by the response.

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.  
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September 11, 1997

ANSWER OF BRADLEY V. PAFFORD  
TO INTERROGATORY OF THE OCA

OCA/USPS-T1-1.

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

OCA/USPS-T1-1.

Response:

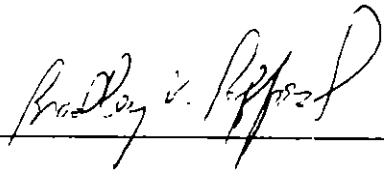
- a. Not necessary.
- b. Not necessary.
- c. N/A.

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- d. The rate category remained the same as a result of MC95-1. The only change was in the name; from third-class single piece to standard mail (A) single piece. There was not any problem with RPW coding of this rate category that would necessitate the need for random recoding.

## DECLARATION

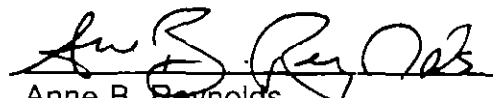
I, Bradley V. Pafford, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_

Dated: 7-11-97

**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.

  
Anne B. Reynolds

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