

DOCKET SECTION

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 TO INTERROGATORY OF
DIRECT MARKETING ASSOCIATION, INC. REDIRECTED FROM WITNESS
BRADLEY (USPS-T-14) AND MOTION FOR LATE ACCEPTANCE
(UPS/USPS-T14-43)

The United States Postal Service hereby provides a response to the following interrogatory of Direct Marketing Association, Inc.: DMA/USPS-T14-43, filed on September 12, 1997 and redirected from witness Bradley (USPS-T-14). The Postal Service also moves for acceptance of this response one business day late. The additional time was needed to investigate the availability of certain data and to determine the effort that would be involved in producing certain of the requested information. Also, certain personnel needed to assist in these efforts were on sick leave. 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



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September 29, 1997

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DMA/USPS-T14-43. Please refer to your response to DMA/USPS-T14-32 and explain precisely which data requested therein do not exist.

- (a) Please describe how the data relating to volumes (piece handlings) in each MODS operations are recorded by the offices that submit volume data to the corporate data base.
 - i. At what frequency are the data initially recorded by the office?
 - ii. Are they aggregated or otherwise transformed by the office? If so, once such aggregations or transformations are performed, are the initial data primitives retained?
 - iii. At what frequency are piece handlings data transmitted to the corporate data base?
 - iv. Are they aggregated or otherwise transformed once in the corporate data base? If so, once such aggregations or transformations are performed, are the initial data received from the reporting offices retained?
 - v. In the corporate data base, do piece handlings data by office and MODS operations exits (a.)by AP, (b.)by week, (c.) by day of the week, and/or (d.) by hour of the day? For each affirmative answer, specify the years for which these data are available at this level of specificity and produce these data for the most recent fiscal year, and at least the two previous years if possible. For each negative answer, indicate the reasons why these data do not exist (e.g., were the data not collected, were the data collected by not retained, or some other reason?) Please explain fully.

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(b) Please describe how the data relating to work hours in each MODS operation are recorded by the office that submit hours data to the corporate data base.

- i. At what frequency are the data initially recorded by the office?
 - ii. Are they aggregated or otherwise transformed by the office? If so, once such aggregations or transformations are performed, are the initial data primitives retained?
 - iii. At what frequency are work hour data transmitted to the corporate data base?
 - iv. Are they aggregated or otherwise transformed once in the corporate data base? If so, once such aggregations or transformations are performed, are the initial data received from the reporting offices retained?
 - v. In the corporate data base, do work hour data by office and MODS operations exits(a.) by AP, (b.) by week, (c.) by day of the week, and/or (d.) by hour of the day? For each affirmative answer, specify the years for which these data are available at this level of specificity and produce these data for the most recent fiscal year, and at least the two previous years if possible. For each negative answer, indicate the reasons why these data do not exist (e.g., were the data not collected, were the data collected by not retained, or some other reason?) Please explain fully.
- (c) When an employee clocks into or clocks out of a mail processing operation, how is the employee's time recorded in the MODS system? For example, is the actual time of day recorded or is the time interval worked recorded? Is this information retained in the data system at the facility level? If so, is the data retained once the data are transmitted to the corporate data base.

DMA/USPS-T14-43 RESPONSE:

Please see the explanations below.

- (a)(i). Piece handling volumes are initially recorded as individual volume transactions as the mail is processed, throughout the day -- for example, as each container of mail is weighed to its first distribution operation, or

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as each automated or mechanized processing run of mail occurs.

- ii. Piece handling volume data are generally aggregated by operation by software applications from individual volume transactions. In some cases this aggregation takes place at the office level (for example, for automated processing runs on different mail processing equipment for the same operation number) or at the main frame computer (for example, mail weighed to the same manual operation). Individual volume transactions are not retained.
- iii. Piece handling data are transmitted to the corporate data base on a weekly and AP basis.
- iv. Piece handling data are transmitted to the corporate data base at the office level. The data can then be aggregated in any number of ways for different purposes.
- v. In the corporate data base, piece handling data by office and MODS operations exist by AP and by week, but not by day of the week or hour of the day. Daily data exist for MODS 1 offices for those operations with which volumes are associated on archived tapes in report format, going back an undetermined number of years. The daily data are used for

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scheduling and staffing purposes. Hourly data do not exist. While data are collected at this level, the data storage needs for this level of detail have been deemed excessive.

Dr. Bradley's data by office and MODS operation supplies piece handling data by offices and MODS operations by AP. The Postal Service will produce, as Library Reference H-285, weekly data for those offices and MODS operations used in witness Bradley's analysis for FY 1994 through FY 1996, as data is generally retained on the corporate data base for the most recent fiscal year and the two previous years. Please note, however, that production of this material will take several weeks. A large amount of data needs to be downloaded. For example, it is estimated that there will be over 40,000 observations for the OCR activity alone. The total number of observations involved may well be over 700,000. Once the data are downloaded, office identifications will need to be encrypted and assigned the same encryption code as in Dr. Bradley's database. Once this process is completed, a CD-ROM will have to be produced. Please note that there may be more or less offices reporting data by week than by AP, so there may not be an exact match between the offices in this database and those in Dr. Bradley's. Please also note that the weekly data will not have been "scrubbed."

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The daily data from the archived tapes, which is not in the corporate data base and therefore is technically outside the scope of this interrogatory, will not be produced. The Postal Service is unable to estimate, at this time, how long it would take to produce the information. Please note, however, that the data reside on the archived tapes in report format, meaning that it cannot be "queried" as with that residing on the corporate data base. In other words, a report would have to be generated for each day, and the data would then have to be consolidated in some fashion by those interested in using it. If the Postal Service were to produce these reports for the last three fiscal years, this would involve a massive amount of data. Basically there would be approximately 142,350 hard-copy or electronic reports (365 days x 130 MODS offices (approximately) x 3 years).

(b)(i). Work hour data are initially recorded as individual clock rings entered for each postal employee, throughout the day.

ii. Work hour data are aggregated by operation number by postal payroll software applications. The work hour data by operation are transferred from postal payroll applications to MODS. Individual employee clock ring data are not retained by MODS.

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iii. Work hour data are transmitted to the corporate data base on a weekly and AP basis.

iv. Work hour data are transmitted to the corporate data base at the office level. The data can then be aggregated in any number of ways for different purposes.

v. In the corporate data base, work hour data by office and MODS operations exist by AP and by week, but not by day of the week or hour of the day. Daily data exist for MODS 1 offices for those operations with which volumes are associated on archived tapes in report format, going back an undetermined number of years. The daily data are used for scheduling and staffing purposes. Hourly data do not exist. While data are collected at this level, the data storage needs for this level of detail have been deemed excessive.

Dr. Bradley's data by office and MODS operation supplies work hour data by offices and MODS operations by AP. The Postal Service will produce, as Library Reference H-285, weekly data for those offices and MODS operations used in witness Bradley's analysis for FY 1994 through FY 1996, as data is generally retained on the corporate data base for the most recent fiscal year and the two previous years. Please note,

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The daily data from the archived tapes, which is not in the corporate data base and therefore is technically outside the scope of this interrogatory, will not be produced. The Postal Service is unable to estimate, at this time, how long it would take to produce the information. Please note, however, that the data reside on the archived tapes in report format, meaning that it cannot be "queried" as with that residing on the corporate data base. In other words, a report would have to be generated for each day, and the data would then have to be consolidated in some fashion by those interested in using it. If the Postal Service were to produce these reports for the last three fiscal years, this would involve a massive

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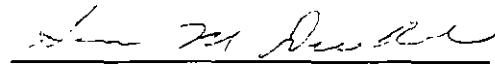
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amount of data. Basically there would be approximately 142,350 hard-copy or electronic reports (365 days x 130 MODS offices (approximately) x 3 years).

- (c) Work hour data are initially recorded as individual clock rings entered for each postal employee, throughout the day. Work hour data are aggregated by operation number by postal payroll software applications. The work hour data by operation are transferred from postal payroll applications to MODS. Individual clock ring data are not retained at the facility level for those offices on the Time and Attendance application on the Postal Source Data System (mainframe MODS facilities) network. Individual clock ring data are retained at the facility level for those offices on the Electronic Time Clock application (PC MODS facilities).

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.



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