

Before the  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes )

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DENNIS P. STEVENS (OCA/USPS-T15-1-6)  
May 6, 2005

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Pursuant to Rules 25 through 28 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 interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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SHELLEY S. DREIFUSS  
Director  
Office of the Consumer Advocate

EMMETT RAND COSTICH  
Attorney

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6833; Fax (202) 789-6819  
E-mail: [costicher@prc.gov](mailto:costicher@prc.gov)

OCA/USPS-T15-1. Please refer to your testimony at page 24, lines 8-9. You state, “Bulk delivery data were not used in the final analysis.”

- a. Who made the decision not to use bulk delivery data?
- b. What were the reasons for not using the data?
- c. How was the time for bulk deliveries treated in witness Bradley’s analyses?
- d. Please provide all bulk delivery data in electronic form by encoded (as in file AL161ZIPS.PRN of LR-K-80) ZIP by route. If file PA159.PRN of LR-K-80 is complete and properly encoded to match AL161ZIPS.PRN, please so state.
- e. Please provide the number of bulk deliveries in electronic form by encoded ZIP.
- f. Please provide, in electronic form, any and all econometric computer programs and output that utilized the bulk delivery data.
- g. Please provide copies of completed form “CARRIER COUNTS” from Excel file “2002 carrier count sheet” in LR-K-78 by encoded ZIP.

OCA/USPS-T15-2. Please refer to LR-K-78, Excel file “volume entry 2002.”

- a. This file contains 35 Tabs labeled “CARRIER FORM” through “CARRIER FORM (35).” Are there any differences between these 35 Tabs? If so, please describe them.
- b. This file contains one Tab labeled “SUPERVISOR FORM.” Please provide copies of the completed forms, deleting Finance Number and encoding ZIPs as in file AL161ZIPS.PRN of LR-K-80.

OCA/USPS-T15-3. Please refer to your testimony at page 24, line 18. You state, “The volume data from the survey were collected at the HQ Help Desk. There the data were scrutinized for possible errors, omissions, and completeness. Questions were referred back to the local Study Coordinators who had their own copies as well as records of Delivery required volume reporting instruments at their disposal.”

- a. Please provide a detailed description of procedures followed and tasks performed by the HQ Help Desk.
- b. Please provide copies of all instructions and training manuals provided to the HQ Help Desk.
- c. Please provide a detailed description of procedures followed and tasks performed by the Study Coordinators.
- d. Please provide copies of all instructions and training manuals provided to the Study Coordinators.
- e. Please provide a list and detailed description of “volume reporting instruments at their disposal.”

OCA/USPS-T15-4. Please refer to USPS LR-K-80 and the associated data files. The file AL161ZIPS.PRN was opened by importing the data into Excel. The first few lines of the file are reproduced below.

957	5/25/2002	11	0	0	1010	73	0
957	5/25/2002	23	0	0	1040	159	0
957	5/25/2002	28	0	0	1024	260	0
957	5/25/2002	29	0	0	885	112	0
957	5/25/2002	38	0	0	896	133	0

On page 2 of USPS LR-K-80 you present a table extract from the AL161ZIPS.PRN File. One of the headings is titled “Masked Zip Code”.

- a. The first column of the file above, containing the ZIP Codes, has no entries similar to the entries in the column titled “Masked Zip Code” on page 2 of the library reference. To be specific, the “Masked Zip Code” entries are expressed with decimal points; there do not appear to be corresponding entries in AL161ZIPS.PRN, a few of whose lines are printed above. Please explain this discrepancy in detail in order that there is no problem in identifying routes, ZIP Codes, etc. on a consistent basis.
- b. In the case of PA159.PRN there seems to be an analogous situation detailed in part a., above. Please provide information similar to that requested in a.
- c. Do the ZIP Codes in PA159.PRN match those of AL161ZIPS.PRN?
- d. None of the ZIP Codes—either those presented above in the table nor the ZIP Codes on page 2 of USPS LR-K-80 appear to match with the ZIP Codes in Dr. Bradley’s databases TIMEPOOL MDATA.PRN, LfvOLUME MDATA.PRN, PAVOLUME MDATA.PRN, and DENSITY MDATA.PRN. Please explain how the ZIP Codes are matched or how the various ZIP Codes are related to Dr. Bradley’s computations.

OCA/USPS-T15-5. Please refer to page 1 of USPS LR-K-80, where you state “These datasets were later merged with the CCSTS scan-time dataset into the database that witness Bradley (USPS-T-14) used to estimate delivery-time regression equations.”

Please provide the methodology, programs, and an explanation of how this was accomplished.

OCA/USPS-T15-6. Please refer to the SAS program CPFINAL in USPS LR-K-79.

- a. Please provide the program LOG.
- b. Please explain the use/meaning of the computer code TOD = INPUT (CTIME, TIME8.); this code is two lines above the comment "Generate Scan Pairs".
- c. The Library Reference does not appear to have a file DATACOLL, a database referenced in the SAS program CPFINAL. Please provide the file and a listing of headings and the definition of the headings. In the event that the requested file is presented under a similar or other name in USPS LR-K-79, please explain the file in detail.
- d. The Library Reference does not appear to have a file POOLS, a database referenced in the SAS program CPFINAL. Please provide the file and a listing of headings and the definition of the headings. In the event that the requested file is presented under a similar or other name in USPS LR-K-79, please explain the file in detail.
- e. The Library Reference does not appear to have a file WEIGHTS. Please provide the file and a listing of headings and the definition of the headings. In the event that the requested file is presented under a similar or other name in USPS LR-K-79, please explain the file in detail.
- f. The program references a file denoted as "Weights". Is this the Weights file in the Library Reference?