

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-T15-7-9)
May 18, 2005

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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OCA/USPS-T15-7. Please refer to your testimony at page 3, lines 12-14. You indicate that invalid or error scan pairs accounted for 9.7% loss of time from the total of all scan sequences.

- a. Your testimony seems to indicate that for the volume of mail analyzed you are unable to account for 9.7% of the time. Is this correct? If not, please explain in detail.
- b. Assuming that you are unable to account for 9.7% of the time to deliver the mail on the routes studied, have you performed or are you aware of any analysis of the impact of this lack of information on the volume variability calculations? If so, please provide such analysis. If not, why not?

OCA/USPS-T15-8. The purpose of this interrogatory is to clarify the delineation of ZIP Codes and column headings. These questions relate to databases in USPS LR-K-78, USPS LR-K-79, USPS LR-K-80, and USPS LR-K-81.

- a. Please refer to USPS LR-K-81. There are four databases in the library reference: Timepool MDATA, PA Volume MDATA, LFVolume MDATA, and Density MDATA. Did witness Bradley obtain this data from any of your work? If the answer is yes, please identify the originating and destination databases. If your answer is no, please explain in detail.
- b. Please refer to the four databases in USPS LR-K-81, the databases used by witness Bradley in his analysis. Please trace the ZIP Codes between any of your databases and the databases used by witness Bradley. For example, the ZIP

Codes for AI161ZIPS.PRN and PA159.PRN do not seem to dovetail with any of the ZIP Codes used in USPS LR-K-81. Please explain.

- c. In the case of USPS LR-K-79, do the values in the variable "Mask" in MDCD.WEIGHTS.MASKZIPS.DATA correspond to ZIP Codes in any databases in USPS LR-K-80 or USPS LR-K-81? Please explain in detail, providing a mapping of ZIP Codes to all other databases referenced in the introduction to this interrogatory.
- d. Column B of COSTPOOL2.FINAL.xls appears to provide ZIP Codes. Please provide a mapping of the ZIP Codes onto other databases mentioned in the heading to this interrogatory.
- e. In USPS LR-K-79, for the database MDCD.ARCHIVE.SUBSET.V4MASK, please provide a mapping of the ZIP Codes to other databases referenced in the heading to this interrogatory.
- f. In USPS LR-K-79, for the database MDCD.ARCHIVE.SUBSET.V4MASK, please provide column headings for the variables.
- g. In USPS LR-K-79, for the database MDCD.SCAN6, please provide column headings.

OCA/USPS-T15-9. On page 2 of "City Carrier Street Time Survey—Time Pool Datasets," USPS LR-K-79, you reference the file ACTIVITY.DEFINITIONS.DOC. There does not appear to be such a named file. Please provide the file or indicate where it may be found.