

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 JOHN KELLEY (OCA/USPS-T16-1-7)  
May 18, 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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OCA/USPS-T16-1. Please refer to your testimony at page 8, lines 16-17. You state that your objective was to estimate the vast majority of variables with a coefficient of variation of less than ten percent.

- a. Why was 10 percent, as opposed to some other percentage, chosen?
- b. In lines 23-25 on page 8 you discuss the use of daily volume as a proxy for other variables in performing the computations. Please show the calculations used in conjunction with your testimony in lines 20-27.

OCA/USPS-T16-2. On page 9 of your testimony, line 26 through page 10, line 2 you discuss three possible strata. Please identify, for each encoded ZIP Code in the final sample, the stratum to which it belongs. If this information is already available in a database, please identify the database, appropriate column and, if possible, provide a printout of the first few lines in order that there may be no doubt on how to interpret the data.

OCA/USPS-T16-3. Please refer to your testimony at page 10, lines 3-6. You reference the method of Dalenius and Hodges in choosing strata boundaries. Please provide the calculations and a table similar to Table 5A.12 in the book you have referenced, William Cochran, *Sampling Techniques*.

OCA/USPS-T16-4. Please refer to your testimony at page 11. You indicate in line 11 that the stratified systematic sample design selected 221 ZIP Codes for the CCSTS. Please provide the calculations leading to the selection of 221 ZIP Codes. That is, how was the projected size of the sample determined?

OCA/USPS-T16-5. On page 12 of your testimony starting at line 5 you state that ZIP Codes with more than sixty letter routes incurred a reduction in sample size from forty-eight ZIP Codes to twelve ZIP Codes.

- a. Did you perform an analysis of the impact on statistical accuracy and precision resulting from this reduction? If so, please provide it. If not, please explain.
- b. Do you have any basis for evaluating whether this reduction introduced bias to the data collection procedure? If so, please furnish any analyses. If not, please explain.

OCA/USPS-T16-6. On page 13 of your testimony, lines 13-19, you delineate the elimination of additional ZIP Codes. Do you have any basis for evaluating whether this reduction introduced bias to the data collection procedure? If so, please furnish any analyses. If not, please explain.

OCA/USPS-T16-7. Please refer to your testimony at page 13, lines 23-25. You indicate that the level of precision for the final sample had a CV of less than six percent. Please provide the calculations underlying this statement.