

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF POSTAL SERVICE WITNESS BRADLEY  
TO INTERROGATORY OF THE OCA (OCA/USPS-T14-25)  
(June 1, 2005)

The United States Postal Service hereby provides the response of witness Bradley to the following interrogatory of the OCA, filed on May 18, 2005: OCA/USPS-T14-25.

Each 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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June 1, 2005

**Response of Postal Service Witness Michael D. Bradley  
To OCA Interrogatories**

**OCA/USPS-T14-25.** Please refer to Library Reference USPS-LR-K-81. The three databases TIMEPOOL MDATA.PRN, LFVOLUME MDATA.PRN, AND PAVOLUME MDATA.PRN each have a variable denoted as "ZIP".

- a. Please confirm that the numbering is consistent between databases, i.e., that ZIP 2222220 is the identical ZIP Code between databases.
- b. The ZIP Codes in Density appear to be different in some cases from those in the three previously mentioned databases. Please confirm that the ZIP Codes in Density are consistent with the ZIP Codes in the other three databases.
- c. The ZIP Codes in PA159.PRN and AL161ZIPS.PRN do not immediately appear to be consistent with the databases TIMEPOOL MDATA.PRN, LFVOLUME MDATA.PRN, AND PAVOLUME MDATA.PRN. Please explain how the ZIP Codes are related. If the ZIP Codes are not related, please explain the use of PA159.PRN and AL161ZIPS.PRN.

**Response:**

- a. Confirmed.
- b. Confirmed. Please note that the Zip Codes in the density file include all Zip Codes included in the Census dataset. This means that the density file will include many more Zip Codes than the other files (which are limited to the Zip Codes included in the study).
- c. Please see the response to OCA/USPS-T15-4d.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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