

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
FIFTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ROBERT L. SHAW, JR. (VP/USPS-T2-28-30)
(June 16, 2005)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

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June 16, 2005

VP/USPS-T2-28.

For Cost Segment 6.2, City Carrier In-Office Support, please provide the total number of In-Office Cost System (“IOCS”) tallies in Base Year 2004, and a breakdown of those tallies showing separately the number tallies for personal time, moving empty equipment, clocking in and out, training, obtaining mail and keys, checking and preparing vehicles, attending safety meetings, etc.

VP/USPS-T2-29.

Please refer to your testimony at page 3 (ll. 9-22), which discusses data validation and editing.

- a. In the course of validating and editing IOCS tallies for Base Year 2004, please indicate how many tallies in Cost Segments 3 and 6 (please show each segment separately) were deleted from the IOCS data base, and indicate the reasons for such deletions.
- b.
 - (i) In the course of validating and editing IOCS tallies for Base Year 2004, please indicate how many tallies in Cost Segments 3 and 6 (please show each segment separately) were subject to some kind of error correction before being included in the IOCS data base.
 - (ii) Please indicate and discuss the most common types of errors that occurred in the course of validating and editing IOCS tallies for Base Year 2004, but which were not considered sufficient to require elimination of tallies from the data base.

VP/USPS-T2-30.

The Data Quality Study (April 16, 1999), which was prepared for the Postal Service by A. T. Kearney, Inc., recommended (at p. 41) that one option for improving distribution key share data for MODS costs pools would be to replace the IOCS with a new sampling system that measures the actual concept of interest. What consideration is the Postal Service giving to this recommendation? Please describe any steps that have been taken in that regard.