

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 INTERROGATORIES OF NAA (NAA/USPS-T14-1, 3)  
(June 24, 2005)

The United States Postal Service hereby provides the response of witness Bradley to the following interrogatories of NAA, filed on June 10, 2005: NAA/USPS-T14-1, 3. Question 2 was redirected to the Postal Service. Note that, as filed, these questions were designated as NAA/USPS-T9, but that designation has been corrected to NAA/USPS-T14 in these responses.

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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Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, Fax -5402  
June 24, 2005

Response of Postal Service Witness Michael D. Bradley  
To Interrogatories Posed by NAA

NAA/USPS-T14-1: What were the beginning and ending dates for the two week period studied in the CCSTS?

NAA/USPS-T14-1 Response:

The scheduled period for the CCSTS started with Saturday May 18, 2002 and ended Friday May 31, 2002. Please note that a small number of Zip Codes could not perform the study during the scheduled period for administrative reasons and completed it during a subsequent 2 week period in June 2002.

Response of Postal Service Witness Michael D. Bradley  
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NAA/USPS-T14-3: Please refer to page 33, lines 4 to 8 of your testimony. Please elaborate on why you believe that the estimated variabilities from the pooled model” seem to comport better with operational understanding of carrier activities.”

NAA/USPS-T14-3 Response:

There are two reasons that I think the variabilities from the pooled model comport better with operational understanding of carrier activities. First, the combined variabilities (across all “shapes”) from the pooled model is 41.1%. From the fixed effects model the combined variability is just 20.1%. This latter figure is substantially below previous estimates for similar activities. This can be seen by examining the variability for the regular delivery, parcel accountable delivery and network travel time cost pools. These cost pools cover approximately the same activities as the load time, access time and route time variabilities in the Commission’s methodology. The average variability from the Commission’s methodology for these activities is about 30%. The corresponding variability from the pooled model is 36.6%. On the other hand the corresponding variability from the fixed effect model is just over 20%. Second, the implied marginal times for delivering mail from the pooled model would appear to comport better with operational reality. For example, the marginal time for delivering an additional letter is 1.39 seconds from the pooled model but only 0.19 seconds from the fixed effects model. In discussions with Postal Service experts on delivery

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operations, I found that they were generally comfortable with the marginal times from the pooled model.

## 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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Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, FAX: -5402  
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