Postal Rate Commission
Submitted 6/23/2006 4:11 pm
Filing ID: 49823
Accepted 6/23/2006

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

POSTAL RATE AND FEE CHANGES, 2006	Docket No. R2006–1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
TO INTERROGATORIES OF THE OCA (OCA/USPS-T17-1 -2)
(June 23, 2006)

The United States Postal Service hereby partially objects to the following interrogatories of the OCA, filed on June 13, 2006: OCA/USPS-T17-1 - 2. These questions both relate to Prof. Bradley's choice of econometric software. For the window service analysis presented in USPS-T-17, Prof. Bradley chose to utilize EViews, a widely-utilized, off-the-shelf, standard econometric software package. The OCA's questions candidly acknowledge that the OCA lacks any access to or experience with EViews, and proceed to attempt to shift to Prof. Bradley the burden of dealing with the fact that the OCA would have preferred that he use SAS. The Postal Service objects.

Prof. Bradley's econometric analysis using EViews was filed in accordance with the Commission's Rules of Practice, which do not specify use of any particular software. The Rules do, however, specify, that "material provided on PC media must be submitted in a form that allows it to be replicated using a publicly available PC application." Rule 31(b)(vii). EViews satisfies this standard. Moreover, the analyst is not required to justify his or her choice of software, particularly when, as in this instance, the software in question is a widely-available standard commercial application. OCA question 2 essentially challenges Prof. Bradley's decision to utilize EViews rather than SAS. As long as EViews provides reliable results for standard econometric procedures (and the

OCA does not and cannot make any suggestion to the contrary), the relative merits of EViews versus SAS are not particularly relevant. The intent of question number 2 seems to be to establish the OCA's preferred software as the default, and discourage use of any other software by forcing the witness to justify the choice. There is no default software in the rules, however, and the OCA cannot unilaterally seek to impose one.

The Postal Service's objection to OCA/USPS-T17-1 – 2 is only partial, and Prof. Bradley will provide answers to assist the OCA in its efforts to understand his analysis. But the Postal Service objects to the implicit presumption in these questions that its witnesses will have an extra burden anytime they do their analysis using any software other than SAS. The OCA is free to conduct all of its analyses in SAS if it so chooses, but it cannot impose that limitation on other parties.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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June 23, 2006

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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