

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20068-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER
ASSOCIATION TO POSTAL SERVICE WITNESS CZIGLER, USPS-T-1
(NNA/USPS-T1-11-26)

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service Martin Czigler and requests full and complete responses. If the witness is not able to respond to any interrogatory, the witness is requested to refer the interrogatory to the United States Postal Service for a response by a competent witness.

Respectfully submitted,

Tonda F. Rush
KING & BALLOW
PO Box 50301
Arlington, VA 22205
(703) 812-8989
(703) 812-4555(fax)
trush@americanpressworks.com
Counsel to National Newspaper
Association, Inc.
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NNA/USPS-T1-11 At page 4 of your testimony, at line 6, you state that “Appendix D (of USPS-LR-L-9) documents the Within County Periodicals’ edits...” In Appendix D of USPS-LR-L-9, you explain that the purpose of Appendix D “is to describe the process of verifying IOCS Within-County Periodicals tallies.” Please explain fully, why it was necessary in this rate proceeding to verify IOCS Within-County tallies in the ways that are set forth in Appendix D. In addition, please explain why the USPS did not find it necessary to use similar methods to verify IOCS tallies for other sub-classes in this case.

NNA/USPS-T1-12 At page 4 of your testimony, at line 6, you state that “Appendix D (of USPS-LR-L-9) documents the Within County Periodicals’ edits...” In Appendix D of USPS-LR-L-9, at page D-3, you state “The manual check of IOCS Periodicals tallies uses a variety of criteria to determine the appropriate subclass.” With respect to each criterion used in the manual checking process to determine the appropriate subclass, please explain why each criterion was needed.

NNA/USPS-T1-13 At page 4 of your testimony, at line 6, you state that “Appendix D (of USPS-LR-L-9) documents the Within County Periodicals’ edits...” In Appendix D of USPS-LR-L-9, at page D-3, you state “For FY 2005, 174 out of a total of 7,671 Periodicals tallies required manual checks.” With respect to this statement, please explain fully how it was determined that exactly 174 Periodicals tallies required manual checks while 7,497 Periodicals tallies did not require manual checks.

NNA/USPS-T1-14 At page 4 of your testimony, at line 6, you state that “Appendix D (of USPS-LR-L-9) documents the Within County Periodicals’ edits...” In Appendix D of USPS-LR-L-9, at page D-3, you state “For FY 2005, 174 out of a total of 7,671 Periodicals tallies required manual checks.” With respect to this statement, please confirm that these 7,671 tallies represent the final number of tallies for all Periodicals in BY 2005 that was used by the Postal Service to determine IOCS-based cost calculations for Periodicals in this case. For any answer, other than a confirmation, please provide the correct final Periodicals tally count and an explanation as to how to derive that count using the IOCS Base Year 2005 data that was included in USPS-LR-L-9.

NNA/USPS-T1-15 In Appendix D of the IOCS Computer and Statistical Documentation provided in USPS-LR-L-9, at page D-11, you list the following output files; **hqtal2005new.dat, tally_change.05, changed.cts, summ2005.rpt and summ2005.csv**. Please provide each of these output files in electronic form and furnish all results produced by or in each of these files in both electronic and hardcopy form.

NNA/USPS-T1-16 In USPS-LR-L-9, the Postal Service has provided a workbook entitled “hand 2005” that appears to relate to the IOCS In County Verification of tally counts for FY 2005. In this workbook, please explain fully

what is meant by an “original” tally count for Within County of 238 tallies and what is meant by a “final” tally count for Within County of 341 tallies as shown in the “Final Counts” spreadsheet contained in “hand 2005.”

NNA/USPS-T1-17 In USPS-LR-L-9, the Postal Service has provided a workbook entitled “hand 2005” that appears to relate to the IOCS In County Verification of tally counts for FY 2005. In this workbook, specifically in the “Final Counts” spreadsheet, the USPS reports that in a file known as “incty.tally,” there were 126 tallies at one time and 128 tallies at another time. Moreover, at page D-5 of Appendix D, the USPS reports that the output file “incty.tally” was “Verified as Within-County Periodicals tallies.” With respect to this file, please explain how these tally counts were verified, why these “Verified” tallies changed over time and which of the two values represents the final tally count for Within County tallies in this file.

NNA/USPS-T1-18 In USPS-LR-L-9, the Postal Service has provided a workbook entitled “hand 2005” that appears to relate to the IOCS In County Verification of tally counts for FY 2005. In this workbook, specifically in the “Master” spreadsheet, the USPS reports eight examples of “Inconsistent Tallies.” These eight tallies do not include Pub. No. 680720, Westmoreland News. However, in the next spreadsheet, “Further Checks,” the USPS reports the Westmoreland News as one of five examples of “Inconsistent Tallies.” Please explain fully how the USPS adjusted inconsistent tallies in this analysis and how it could add a new Inconsistent Tally as part of its checking process outlines in “hand 2005.”

NNA/USPS-T1-19 In USPS-LR-L-9, the Postal Service has provided a workbook entitled “hand 2005” that appears to relate to the IOCS In County Verification of tally counts for FY 2005. In this workbook, various spreadsheets indicate whether a change in classification was made as between In-County and Outside County publications. For each spreadsheet provided in the “hand 2005” workbook, please provide the number of Within County and Outside County changed entries and the number of entries in each group that “stays same” as a result of this process. In addition, please provide the final number of changed and unchanged entries for Within County and Outside County Periodicals that were used by the USPS in subsequent IOCS calculations.

NNA/USPS-T1-20 In USPS-LR-L-9, the Postal Service has provided a PC SAS data file for its IOCS Base Year 2005 data. In that data file, it appears that 7,541 “Y” answers were recorded in response to the question Q23E06, “Is Mail Piece a Periodical?” Please reconcile this count with the count of 7,671 Periodicals tallies that is referenced in Appendix D, at page D-3. Please explain fully why the USPS added 130 tallies where the Mail Piece was not characterized as a Periodical.

NNA/USPS-T1-21 In USPS-LR-L-9, the Postal Service has provided a PC SAS data file for its IOCS Base Year 2005 data. In the data field labeled “Edited-

Activity Code” (F244) it appears that 7,746 observations (out of 726,472) fall into activity code Nos. 2211 (356) and 2212 (7390). Please reconcile this total with the count of 7,671 Periodicals tallies referenced in Appendix D, at page D-3.

NNA/USPS-T1-22 In USPS-LR-L-9, the Postal Service has provided a workbook entitled “hand 2005” that appears to relate to the IOCS verification of tally counts for FY 2005. In the Master spreadsheet shown in this file, the USPS classifies each tally by activity code. The referenced codes in the Master spreadsheet include 2211, 2212 and 1211. However, with respect to the PC SAS data file for IOCS Base Year 2005, the USPS provided a data field labeled “Edited Activity Code” (F244) in which 7,541 Periodicals tallies (See Response to Q23E06) were spread across eleven activity codes including 1211, 1212, 2211, 2212, 2780, 3212, 4212, 4780, 5340, 5745 and 9190. Please provide descriptions of all activity codes used by the USPS in the IOCS process and reconcile Periodicals tallies in these eleven activity codes with the tallies in the three activity codes listed in the Master spreadsheet of “hand 2005.”

NNA/USPS-T1-23 In USPS-LR-L-9, the Postal Service has provided a PC SAS data file for IOCS Base Year 2005 data. In the data field labeled “Edited-Activity Code” (F244) it appears that 7,746 observations (out of 726,472) fall into activity code Nos. 2211 (356) and 2212 (7390). In the same database, the USPS provided a data field labeled “Final Basic Function” (F261) in which these 7,746 tallies were spread across three functions, Nos. 1, 2 and 5. Please provide descriptions of all final basic functions used by the USPS in the IOCS process and explain fully how each function was used in subsequent calculations by USPS.

NNA/USPS-T1-24 In USPS-LR-L-9, the Postal Service has provided a workbook entitled “hand 2005” that appears to relate to the IOCS verification of tally counts for FY 2005. In the Final Count spreadsheet shown in that workbook, please reconcile the total number of In County “original” and “LRCA” tallies (238 and 341 respectively) with the total number of tallies in activity code 2211 (356) as shown in the Edited Activity Code Field (F244) in the PC SAS data file for the USPS IOCS Base Year 2005 data that was also provided in USPS-LR-L-9.

NNA/USPS-T1-25 With respect to the CV calculations that appear in Tables 1, 2 and 3 of USPS-T-1, in Appendix I, page 1-4, you state that “After all individual iteration is completed, the estimated costs are written to a general summary file.” Please provide this complete file showing the estimated cost of each individual iteration as used in the development of CVs as shown in Tables 1, 2 and 3.

NNA/USPS-T1-26 With respect to the CV calculations that appear in Tables 1, 2 and 3 of USPS-T-1, in Appendix I, page 1-4, you state that “After all iterations are completed, the combined results are used to calculate the coefficients of variation per subclass of mail” Please provide all underlying data and a step-by-

step explanation as to how the combined results were used to calculate the coefficients of variation by subclass that appear in Tables 1, 2 and 3.