

Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS NORMA B. NIETO (OCA/USPS-T24-1-8)
(June 28, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

Shelley S. Dreifuss, Director
Office of the Consumer Advocate

Kenneth E. Richardson
Attorney

901 New York Avenue N.W.
Suite 200
Washington, D.C. 20268-0001
(202) 789-6859; Fax (202) 789-6891
e-mail: richardsonke@prc.gov

OCA/USPS-T24-1. This interrogatory requests information on the selection of sites for the collection of data as outlined in Library Reference USPS-LR-L-78.

- (a) Please provide the analysis substantiating the selection of \$537,786 for stratification purposes between large and small sites.
- (b) Please provide the total number of large sites from the 15,096 post offices with the POS-ONE system.
- (c) Please provide the total number of small sites from the 15,096 post offices with the POS-ONE system.
- (d) Please provide the mean and standard deviation for total revenue in 2005 for large sites.
- (e) Please provide the mean and standard deviation for total revenue in 2005 for small sites.
- (f) Please provide the mean and standard deviation for POS-ONE sites in 2005.
- (g) Please provide the analysis substantiating the selection of 27 sites rather than some other number of sites for data collection purposes.
- (h) Please provide the analysis substantiating the decision to collect data from two large and one small site, rather than some other proportion and number of sites.

OCA/USPS-T24-2. At the 27 sites for data collection, the Postal Service ultimately obtained a total of 7915 observations, broken down between varieties of products.

- (a) Did you perform an analysis of the number of transaction observations needed for each product in order to determine whether the sample was statistically representative? If your answer is affirmative, please provide the study. If your answer is negative, please discuss in detail, indicating how such a study could be conducted and why such a study was not conducted.
- (b) Are there any products in your sample for which the sample is not statistically meaningful?

OCA/USPS-T24-3. This interrogatory requests information on the collection of time information relative to transactions as discussed in Library Reference USPS-LR-L-78 at page 10. You indicate that "...it was determined that data collectors could possibly record either the start of an activity (transaction, or clerk moving away from the window) or the end, since the recording of the beginning of a new activity was simultaneous with the end of the previous activity, or vice versa." In your testimony at page 6 you indicate that data collectors recorded time of the customer approaching the window, time the transaction began, and time the transaction ended.

- (a) Please reconcile what appears to be conflicting information and please indicate how time was recorded.
- (b) If business were slow at a site and assuming that time data were collected as indicated in Library Reference USPS-LR-L-78, is there not the possibility that a substantial amount of time would be recorded during

- which time the clerk was simply awaiting the arrival of a customer?
- Please confirm that such time could be a few seconds, with the casual arrival of customers or even a few minutes at a slow time of day. If you do not confirm, please explain.
- (c) How was waiting time between transactions recorded?
- (d) Was waiting time included as part of the measured time related to transactions? Please explain.
- (e) You discussed the “walk” part of the transaction in your testimony on page 6. Is it correct that the “walk” part of the transaction was included in some transactions and not in others? Please explain.
- (f) If the “walk” time, as identified in (e) or the waiting time, as identified in (b), were included in transactions, is it possible that time for an identical transaction could be significantly different from office to office—depending not upon type of transaction but, rather, on office layout and level of patronage? Please explain.

OCA/USPS-T24-4. The purpose of this interrogatory is to request additional information concerning “nested” transactions, as discussed on page 11 of Library Reference USPS-LR-L-78 . Please list the number of nested transactions retained and the number of nested transactions deleted by product type.

OCA/USPS-T24-5. The Postal Service gathered the transaction data during April and May. Do you have any studies or experience to confirm that the postal

transactions occurring during these two months are representative of postal transactions for an entire year? Please explain.

OCA/USPS-T24-6. For each type of product, please provide information on the number of observations gathered and the number of observations that actually were in the database.

OCA/USPS-T24-7. For each location and each day, please indicate the number of clerks from whom transactions data were gathered.

OCA/USPS-T24-8. One would expect that, in addition to processing transactions, clerks also have other periods of time during which they may perform other tasks, take breaks, or standby ready to serve. Was any of this time included in the transaction time recorded in the study? Please explain.