

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T5-11-15)

The United States Postal Service hereby provides responses of witness Alexandrovich to the following interrogatories of Douglas F. Carlson: DFC/USPS-T5-11-15, filed on October 20, 1997.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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November 3, 1997

Response of United States Postal Service Witness Alexandrovich
to
Interrogatories of Douglas F. Carlson

DFC/USPS-T5-11. Please refer to your response to DFC/USPS-T5-5(c).

- a. If necessary, could the Postal Service, using a reasonable expenditure of time and resources, train IOCS data collectors to distinguish between stamped cards and other cards? Please answer to the best of your knowledge. If your answer is anything other than an unqualified yes, please explain your answer fully.
- b. Using a reasonable expenditure of time and resources, is the Postal Service unable to train IOCS data collectors to distinguish between stamped cards and other cards? Please answer to the best of your knowledge. If your answer is anything other than an unqualified no, please explain your answer fully.
- c. Please define "other agency cards."

Response to DFC/USPS-T5-1

- a-b. Setting aside, for the moment, what you would consider a "reasonable expenditure," it may be safe to assume that additional training designed to improve data collectors' ability to distinguish stamped cards from private postcards would result in fewer coding errors, but some errors may still occur. Moreover, my response to DFC/USPS-T5-5(c) also states that the Postal Service plan to make the treatment of postal cards consistent with that of stamped envelopes made the distinction between stamped and private cards irrelevant. Since eliminating this distinction made it unnecessary for a data collector to differentiate between stamped and private cards, any amount of money spent to improve their ability to do so might be considered unwarranted and unreasonable.

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- c. "Other agency cards" refers to U.S. Government cards that bear a "Postage and Fees Paid" indicia in the upper right corner of the address side of the card.

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DFC/USPS-T5-12. Please refer to your response to DFC/USPS-T5-5(d). Please confirm that no studies or other analyses have concluded that the reliability of the cost data for postal cards that you presented in Attachment 1 to Response to DFC/USPS-T5-2(b) has been affected in any significant way by the misidentification of stamped cards and other cards by IOCS data collectors. If you do not confirm, please explain fully and provide relevant documents of any such changes.

Response to DFC/USPS-T5-12

Confirmed.

Response of United States Postal Service Witness Alexandrovich
to
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DFC/USPS-T5-13. Please refer to your response to DFC/USPS-T5-9(b).

- a. Please confirm that errors in properly coding stamped cards, private post cards, and other agency cards might have caused the attributable cost for stamped cards that you provided in Attachment 1 to Response to DFC/USPS-T5-2(b) to be overstated. If you do not confirm this possibility, please explain fully and provide copies of relevant documents or studies.
- b. Please confirm that errors in properly coding stamped cards, private post cards, and other agency cards might have caused the attributable cost for private post cards that you provided in Attachment 1 to Response to DFC/USPS-T5-2(b) to be understated. If you do not confirm this possibility, please explain fully and provide copies of relevant documents or studies.

Response to DFC/USPS-T5-13

a-b. Coding errors could cause costs to be either overstated or understated.

There is also the possibility that coding errors could more or less cancel out, leaving costs relatively unaffected. Please note that if data collectors are identifying postal cards as belonging to the larger category of private postcards, then postal card costs could be understated.

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DFC/USPS-T5-14. Please answer DFC/USPS-T5-9(c) using the definition of "public interest" that the Postal Service used when it determined, under 39 U.S.C. § 3622(a), that a stamped-card fee would be in the public interest.

Response to DFC/USPS-T5-14

I am still not sure what criteria you would use to define the public interest. I also am not sure that the Postal Service is required to make a determination that changes in data collection methods are in the public interest, or that the definition of "public interest" would be the same for purposes of determining *whether to recommend a change in classification and for purposes of making a change in data collection methods*. Nevertheless, it seems to me that if the Postal Service determined to change the data collection method for cards because of coding errors and to make the treatment of postal cards more consistent with stamped envelopes, this could be said to be in the public interest.

Response of United States Postal Service Witness Alexandrovich
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DFC/USPS-T5-15. Please refer to Attachment 1 to DFC/USPS-T5-15. This attachment depicts four cards, numbered one through four. Assume that these cards are consistent with the requirements of DMM § C100.2.1 and any other applicable regulations defining a First-Class Mail card. (Note that the image of each card has been reduced so that the four cards will fit on one sheet of paper.)

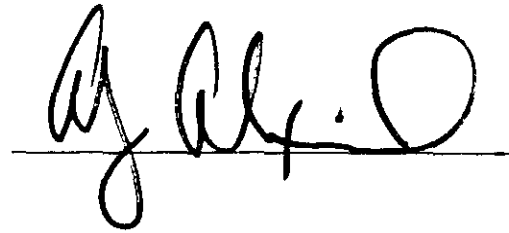
For each card, please state, to the best of your ability, whether the card is (i) a stamped card or (ii) a private post card. To the extent that you have doubt about the categorization of each card, please provide your best determination and specify the factors that prevent you from making a definitive determination or the additional information that you would need to make a definitive determination.

Response to DFC/USPS-T5-15

Please note that I have never been trained as a data collector. To the best of my ability, however, I would identify Cards #1, #3, and # 4 as private postcards and Card #2 as a stamped card.

DECLARATION

I, Joe Alexandrovich, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Joe Alexandrovich", written over a horizontal line.

Dated: 11/3/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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