

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MARTIN CZIGLER TO INTERROGATORIES OF NATIONAL NEWSPAPER ASSOCIATION
NNA/USPS-T1-27-34

The United States Postal Service hereby provides the responses of witness Martin Czigler to the following interrogatories of the National Newspaper Association: NNA/USPS-T1-27-34, filed on June 26, 2006. A partial objection, then a narrower revised partial objection, were filed with respect to interrogatory NNA/USPS-T1-32 on July 24, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN CZIGLER
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-27. In NNA/USPS-T1-13, you were asked to “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.” In your response you indicated that “The subclass of the 174 tallies could not be resolved automatically by the programs described in USPS-LR-L-9, Appendix D.” With respect to each of the 174 Periodicals tallies that required manual checks please state why each tally required a manual check and whether each tally was ultimately classified by the USPS as a Within County Periodical, an Outside County Periodical or not a Periodical at all.

RESPONSE:

Each of the 174 Periodical tallies that were manually checked are listed in the workbook “hand2005.xls”, worksheet “Master” in LR-L-9, Appendix H, by section headings that indicate the reason for a manual check.

- Inconsistent Tallies – Tally occurs outside county of original entry, but there are Within-County volumes from PostalOne. Output from recode.f
- incty.octy.chk – Original activity code indicates Within-County, but destination county is different from county of original entry, PostalOne has neither Within County or Outside County volumes at any finance number within the county of original entry, and it is not a CPP publication. Output from checkcpp22.f
- incty.box11.chk – PostalOne has no Periodical volumes at any rate at the the office of original entry, but does show Within-County volumes at another finance number. It is not a CPP publication. Output from checkcpp.f
- incty.nopb.chk – PostalOne has neither Within County or Outside County volumes at any finance number within the county of original entry. The publication is also not a CPP publication. Output from checkcpp.f

The initial subclass assignment from program ALB040 is listed in column H, while a ‘1’ in column J indicates whether the subclass was changed as a result of the manual verification.

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NNA/USPS-T1-28. In your response to NNA/USPS-T1-14, you state that “Ten tallies did not initially receive the additional checking described in LR-L-9, Appendix D. With respect to each of these tallies, please explain fully why each tally initially was considered not to require manual checking and why this assessment changed so that manual tallies were ultimately required. Please indicate whether each of these ten tallies was ultimately classified by the USPS as a Within County Periodical, an Outside County Periodical or not a Periodical at all.

RESPONSE:

The ten Periodical tallies were from employees handling Postage Statements and these received an activity code indicating USPS mail during preliminary analysis. However, when a mailpiece from the mailing is available, its characteristics are recorded and its class can be identified. This oversight in program ALB040 was corrected before final cost estimates for FY2005 were generated, at which time one received a Within-County and nine received Out-of-County activity codes. The ten Periodical tallies initially did not receive any of the Periodical subclass checks documented in LR-L-9, Appendix D. The automated checks, when eventually run, validated the subclass assigned by program ALB040. Manual checking was not required for any of the ten.

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NNA/USPS-T1-29. In the file labeled "summ2005.rpt" in USPS-LR-L-156, you indicate that in the "Original Distribution," there were 387 Within County tallies. Please explain fully how each of these 387 "original" Within County tallies can be identified in the PC SAS data file for IOCS Base Year 2005 (prcsas.sas7bdat) that was previously provided in USPS-LR-L-9. If these "original" tallies cannot be identified in the PC SAS data already provided, please furnish a comparable but revised PC SAS data file for IOCS Base Year 2005 data in which these 387 Within County tallies can be identified.

RESPONSE:

The 387 tallies originally identified as potential Within County tallies can not be identified in the IOCS data file prcsas05.sas7bdat provided in LR-L-9. However they can be identified in the data file hqtal2005NewPRC.dat provided in library reference LR-L-156. This can be read into PC SAS using the SAS macro %iocsfmt in writerNew.txt, also provided in LR-L-156. Variable F244 contains the activity code assigned by program ALB040. The following SAS code reads the data file and extracts the 387 tallies.

```
%let pathLibRef = E:\Archive\PRC\R2006-1\LibRef\USPS-LR-L-156;
%include "&pathLibRef\NNA_USPS-T1-15\writerNew.txt";
filename Prdcls "&pathLibRef\NNA_USPS-T1-15\HQTAL2005NewPRCFlat.dat";
data PrdclsUpdated;
  infile Prdcls lrecl = 695;
  input %iocsfmt;
  if substr(f244,2,3) = '211';
run;
```

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NNA/USPS-T1-30. In the file labeled "tally_changes.05" in USPS-LR-L-156, you list instances where the activity code for "request.pubs" tallies was changed from 2211 to 2212. With respect to these changes, please provide a step-by-step review of the procedures used by the USPS to identify such publications and to confirm that all such publications in the tally sample were identified.

RESPONSE:

Periodicals are identified as Subscriber (S) or Requester (C) in column 17 of file sec.offoe.05. Program recode.f checks every Periodical tally against this file. Both the file and program are provided in LR-L-9, Appendix H.

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NNA/USPS-T1-31. In your response to NNA/USPS-T1-16, you indicate that the “original” tally count of 387 reflects the number of tallies identified as potential Within County Periodicals following the process described in LR-L-9, Appendix B, Part 2, section 6.8. Please refer to Table 1 in your response to NNA/USPS-T1-20. Are the tally counts listed under the heading “Number of tallies” in that response calculated at the same step in processing (Appendix B, Part 2, section 6.8) as the “original” tally count of 387. If not, please provide a breakdown of both the 387 “original tallies” and the total number of tallies by IOCS question (as shown in Table 1) as those counts appeared at the same “original” process step. 3

RESPONSE:

Yes.

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NNA/USPS-T1-32. In your response to NNA/USPS-T1-18, you indicate that “Westmoreland News was inadvertently included among the inconsistent tallies. Later processing with a more complete data base eventually enabled this tally to be verified automatically.” With respect to this response, please explain fully what you mean by “a more complete data base” and provide the earlier, less complete data base in PC SAS format.

RESPONSE:

The mapping of ZIP codes to counties was updated for FY2005 processing, but not in time for the preliminary analysis that led to identification of Westmoreland News as a Within-County Periodical destinating outside the county of original entry. The earlier data are available in library reference LR-K-9, Appendix H, file county.zipcode.

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NNA/USPS-T1-33. In your response to NNA/USPS-T1-20, you list Periodicals responses by IOCS question. With respect to Table 1 in this response, please confirm, that Q23G01 and Q23G01A would only have been asked if the answer to Q23E06 was not Y. Explain fully any answer other than a confirmation.

RESPONSE:

Not confirmed. Question Q23E6 is asked if the response to Q23E2 “Presence of Indicia” is H – No Indicia. If an indicium is present, such as Permit, then Q23G1 or Q23G1A will be asked. See “IOCSDataEntryFlowchartFY05.xls” in LR-L-9, Appendix H, for the full description of the program flow of the IOCS-CODES data entry software.

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NNA/USPS-T1-34. In your response to NNA/USPS-T1-20, under the column heading “Number non Periodicals” in Table 1, please confirm that these values reflect tallies which had initially been identified as Periodicals in responses to Q23E06, Q23G01 or Q23G01A but which were subsequently identified as non-Periodicals. Please explain fully any answer other than a confirmation.

RESPONSE:

Confirmed. Please also see the revised response to NNA/USPS-T1-20.