

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

RESPONSES OF OFFICE OF THE CONSUMER ADVOCATE  
WITNESS J. EDWARD SMITH TO INTERROGATORIES OF  
ADVO (ADVO/OCA-T3-33-56)  
(October 13, 2006)

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The Office of Consumer Advocate hereby submits responses of J. Edward Smith to interrogatories ADVO/OCA-T3-33-56, dated September 29, 2006. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

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RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-33. With respect to the DOIS data, please provide your understanding of the following and provide the sources for your understanding:

- (a) Purposes for which the data were originally collected and any changes in those purposes over time.
- (b) How the DOIS data have been used by postal management over time.

RESPONSE TO ADVO/OCA-T3-33

(a) My understanding of DOIS is based on information presented in Docket No. R2005-1 in testimony and interrogatory responses. The Delivery Operations Information System (DOIS) provides Delivery Unit supervisors with operations data for management and decision making purposes. For example, supervisors are able to compare actual work hours used to projected work hours required, as well as use the data in achieving operating efficiency on the routes they manage.

- (b) See (a). I have no further information.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-34. With respect to the DOIS data, please provide your understanding of the following and the sources for your understanding:

- (a) Portions of the city carrier system the data represent (by year)
- (b) The types of zip codes/routes/carriers for which DOIS does not collect information - and any changes over time.
- (c) Number of city letter and special purpose routes and carriers represented in DOIS by year
- (d) Total number of city letter and special purpose routes and carriers in the postal system by year

RESPONSE TO ADVO/OCA-T3-34

(a) It is my understanding that in 2005 DOIS covered approximately 158,000 city routes, over 96 percent of city carrier routes, as reported in Tr. 8D/4782-83, Docket No. R2005-1.

(b) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

(c) See (a).

(d) It is my understanding that there are approximately 164,000 routes, according to Tr. 8D/4784.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-35. Please provide your understanding of all critiques of the DOIS data, DOIS data collection activities, and/or usefulness of the DOIS data for its intended purposes. Please also provide the sources for your understanding.

RESPONSE TO ADVO/OCA-T3-35

I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-36. Please identify and describe all the data and information categories collected by the USPS that are included within DOIS. If these have changed over time, please also specify the changes. Please provide the sources for your understanding.

RESPONSE TO ADVO/OCA-T3-36

While the following materials provided by the Postal Service in Docket No. R2005-1 may not be exhaustive, they do contain extensive information about DOIS data and categories: Tr. 6/1941, 1971, and 2338-51; Tr. 8/4781-4827 and 4908-11; and Tr. 14/6578-80.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-37. With respect to the DOIS data base:

- (a) Please identify and describe any difficulties the USPS incurred over time in collecting, measuring, standardizing, cleaning, or processing the DOIS data. Please provide the sources for your information.
- (b) Please identify and describe any corrections, modifications, or other changes the USPS made to ensure that the difficulties in (a) were eliminated. Please provide the sources for your information.
- (c) Please identify the extent to which DOIS route-day-level observations, on an annual basis, must be corrected in some way during USPS quality control procedures. Please provide the sources for your information.

RESPONSE TO ADVO/OCA-T3-37

(a) – (c) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-38. Please explain your understanding of the following and provide the sources for your understanding:

- (a) If DOIS is implemented within a zip code, does it apply to all city carriers/routes within that zip code? Please explain.
- (b) Does DOIS collect data for all routes/carrier in a [DOIS] zip code on all route-days of the year?
- (c) Do the DOIS data include information on both letter and special purpose route carriers in each [DOIS] zip code?
- (d) How do you tell when zero time or volume data for a zip-route-day is due to a non-delivery day vs. due to uncollected or deleted data?

RESPONSE TO ADVO/OCA-T3-38

- (a) Initially DOIS was applied to all units with 8 or more routes. See Tr. 8D/4782, Docket No. R2005-1. I do not know if it has been extended.
- (b) It is my understanding that DOIS collects data for all DOIS routes on all days with mail delivery.
- (c) – (d) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-39. Please describe the extent to which, in the DOIS database, some data elements within route/carrier-day observations, some full route/carrier-day observations, or some full zip code observations are either not collected or are subsequently eliminated by quality control. Please explain and provide the source of your understanding.

RESPONSE TO ADVO/OCA-T3-39

I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-40. Please provide a description of the USPS standardization, quality control procedures, and data/information manipulation procedures applied to the DOIS data over time. Please provide the source of your understanding.

RESPONSE TO ADVO/OCA-T3-40

I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-41. Please confirm that the data in the vol\_data SAS dataset in USPS LR L-160 were the input to the ReadVolume SAS Program in Section 2 of OCA LR-4. If this is incorrect, please explain why and identify the source of the data used in that program.

RESPONSE TO ADVO/OCA-T3-41

Confirmed.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-42. Do the DOIS data in OCA LR L-4, fnlvladj SAS database file include data on both letter and special purpose route carriers? Please provide the sources supporting your answer.

RESPONSE TO ADVO/OCA-T3-42

I believe only letter routes are included, not special purpose routes. Please see USPS-T-16 at 15, lines 14-15, Docket No. R2005-1. The DOIS data OCA requested in this proceeding come from the same ZIP codes and routes that witness Kelley spoke of in the cited testimony.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-43. Please explain whether an observation as presented in OCA LR L-4, fnlvoladj SAS database file, represents a route-day or a carrier-day. Please provide the sources supporting your explanation.

RESPONSE TO ADVO/OCA-T3-43

Based on information from the Postal Service, I understand that the data cover a route-day.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-44. In OCA LR L-4, fnlvladj SAS database file, please explain your understanding and provide the sources for your understanding:

- (a) If a zip code is represented in the data, are all routes and carriers for all days of that zip code represented?
- (b) If a day is represented in the data, are all possible DOIS zips for that day represented?

RESPONSE TO ADVO/OCA-T3-44

(a) According to witness Kelley (see USPS-T-16 at 15), this should be true (so long as you are referring to city carriers, not rural carriers). But I have not checked to see if this is always the case.

(b) Assuming you are asking about CCSTS ZIPs, then this should be true. But I have not checked to see if this is always the case.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-45. With respect to the street hours variable in the DOIS data in OCA LR L-4, fnlvoladj SAS database file, please provide your understanding of the following and provide the sources for your understanding:

- (a) How street hours were quantified and by who
- (b) How the collection of these data was standardized over time
- (c) Any changes in how these data were collected or measured over time
- (d) What is included in these data - e.g., all clocked street time, lunch, breaks, emergency downtime, temporary assistance on the route, etc. - and any changes over time in what was included in those hours
- (e) How the collection of these hours was standardized over time and over zips and routes.
- (f) Specific quality control procedures applied to the collected data - and any changes over time in those procedures

RESPONSE TO ADVO/OCA-T3-45

(a) The street hours were quantified by the Postal Service. I do not know the procedures they used.

(b) – (c) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

(d) My understanding is that all of the times listed in this question should be included in the data.

(e) – (f) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-46. In OCA LR L-4, fnlvoladj SAS database file, are all the volume variables in numbers of delivered pieces? Please explain.

RESPONSE TO ADVO/OCA-T3-46

Yes.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-47. With respect to the cased letter and cased flat volumes data in the DOIS data in OCA LR L-4, fnlvoldj SAS database file, please provide your understanding of the following and the sources for your understanding:

- (a) The definition of "cased letters"
- (b) The definition of "cased flats"
- (c) How these volumes were collected and measured
- (d) Who collected and measured these volumes and when
- (e) How the collection of these volumes was standardized over time and over zips and routes
- (f) Any changes in how those volumes were collected over time
- (g) Specific quality control procedures applied to these volume data and any changes over time in those procedures

A RESPONSE TO ADVO/OCA-T3-47

(a) Based on my visits to delivery units, I have learned that "cased letters" are letters cased by the carrier. See also Tr. 8D/4805, and USPS-LR-K-128 at 6, Docket No. R2005-1.

(b) Based on my visits to delivery units, I have learned that "cased flats" are flats cased by the carrier. See also Tr. 8D/4805 and USPS-LR-K-128 at 7.

(c) – (d) It is my understanding that the Delivery Unit supervisor is responsible for the measurement of the volumes on a daily basis. End of Run reports furnish some of the data, while manual counts must sometimes be made by delivery supervisors. When necessary, linear feet of product are converted to units. See Tr. 8D/4790-4805 and USPS-LR-K-128.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

(e) – (g) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-48. With respect to total DPS letter and automated letter volumes data in the DOIS data in OCA LR L-4, fnlvladj SAS database file, please provide your understanding of the following and the sources for your understanding:

- (a) The definition of "DPS letters"
- (b) The definition of "automated letters"
- (c) How these volumes were collected and measured
- (d) Who collected and measured these volumes and when
- (e) How carriers treat these volumes in-office (case, separate bundle, etc.)
- (f) How the collection of these volumes was standardized over time and over zips and routes
- (g) Any changes in how those volumes were collected over time
- (h) Specific quality control procedures applied to the these volume data and any changes over time in those procedures

RESPONSE TO ADVO/OCA-T3-48

- (a) "DPS letters" are Delivery Point Sequenced letters. See Tr. 8D/4790, Docket No. R2005-1.
- (b) "Automated letters" are letters which have been sorted to the carrier level by machine at the sorting plant. See Tr. 8D/4790 and 4805.
- (c) It is my understanding that the volumes are read from the sorting machine meters. See Tr. 8D/4790.
- (d) USPS-T-30 at 6, Docket No. R2005-1, provides some of the requested information.
- (e) "Automated letters" are cased; "DPS letters" go to the street as a bundle.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

(f) – (g) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-49. With respect to automated flat volumes data in the DOIS data in OCA LR L-4, fnlvoldj SAS database file, please provide your understanding of the following and the sources for your understanding:

- (a) The definition of "automated flats"
- (b) How carriers treat these volumes in-office (case, separate bundle, etc.)
- (c) How these volumes were collected and measured
- (d) Who collected and measured these volumes and when
- (e) How the collection of these volumes was standardized over time and over zips and routes
- (f) Any changes in how those volumes were collected over time  
Specific quality control procedures applied to the these volume data  
and any changes over time in those procedures

RESPONSE TO ADVO/OCA-T3-49

(a) Automated flats are sorted on equipment at the sorting plant to the carrier route level. See Tr. 8D/4805 and 4826; and Tr. 14/6578, Docket No. R2005-1.

(b) Automated flats are cased by the carrier. See Tr. 8D/4805 and Tr. 14/6578.

(c) I understand that volumes are obtained from machine count (End of Run reports). See Tr. 8D/4805 and Tr. 14/6578.

(d) – (f) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-50. In OCA LR-4, fnlvoldj SAS database file, there are four variables entitled: Sequenced Letters, Sequenced Flats, Sequenced Letter Sets, Sequenced Flat Sets. Please provide your understanding of the following and the sources for your understanding.

- (a) The definitions of "sequenced letters" and "sequenced flats"
- (b) The definition of "set" - e.g., if a saturation mailing is split between two days, are the volumes for each day recorded so that two sets are recorded, one on each day?
- (c) How carriers treat these volumes in-office (case, separate bundle, etc.)
- (d) How these volumes were collected and measured
- (e) Who collected these volumes and when
- (f) How the collection of these volumes was standardized over time and over zips and routes
- (g) Any changes in how those volumes were collected over time
- (h) Specific quality control procedures applied to the these volume data and any changes over time in those procedures

RESPONSE TO ADVO/OCA-T3-50

(a) Sequenced letters are letters received by the Postal Service from the mailer in sequenced form. Sequenced flats are similarly received. See USPS-LR-K-128 at 8 and Tr. 8D/4807, Docket No. R2005-1.

(b) A "set" is a sequential mailing. I would assume that splitting a mailing between two days would create two sets. However, I have not used the set variable in my analysis, so my understanding is irrelevant at this time. See USPS-LR-K-128 at 8.

(c) Sets go to the street without further processing. See USPS-LR-K-128 at 8 and Tr. 8D/4807.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

(d) USPS-LR-K-128 at 5 and 9 contains some information on this subject.

(e) USPS-LR-K-128 and USPS-T-30 at 6 contain some information on this subject.

(f) – (h) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-51. In OCA LR-4, fnlvladj SAS database file, there is a parcels volume variable and a priority volume variable. Please provide your understanding of the following and the sources for your understanding.

- (a) The definition of "parcel" and identification of all the types of mail pieces and subclasses that may be included within that volume
- (b) The definition of "priority" and identification of all the shapes and subclasses that may be included within that volume
- (c) How carriers treat these "parcels" and "priority" volumes in-office
- (d) How carriers treat these "parcels" and "priority" volumes out-of-office
- (e) How these volumes were collected and measured
- (f) Who collected these volumes and when
- (g) How the collection of these volumes was standardized over time and over zips and routes
- (h) Any changes in how those volumes were collected over time
- (i) Specific quality control procedures applied to the these volume data and any changes over time in those procedures

RESPONSE TO ADVO/OCA-T3-51

- (a) Parcels are exactly what the name implies.
- (b) Priority Mail is a product that receives special, priority treatment. Pieces may be letter-, flat-, or parcel-shaped.
- (c) Some types of small parcels and Priority Mail may be combined with other mail during casing.
- (d) Parcels and Priority Mail are delivered with other mail, depending on whether they were cased.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

(e) – (i) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-52. In OCA LR-4, fnlvoldj SAS database file, there is a "route mileage" volume variable. Please provide your understanding of the following and the sources for your understanding.

- (a) The definition of "route mileage" and itemization of the distances included (e.g., travel to and from route, travel between route segments, travel within a route segment, travel along a series of curblines, travel to relay/collection boxes, etc.)
- (b) How these mileages were collected and measured
- (c) Who collected and measured these mileages
- (d) How the collection of these mileages were standardized over time and over zip codes and routes
- (e) Any changes in how those mileages were collected over time
- (f) Specific quality control procedures applied to these data and any changes over time in those procedures

RESPONSE TO ADVO/OCA-T3-52

(a) – (b) Tr. 8D/4808, Docket No. R2005-1, indicates that route base mileage is the difference between the ending odometer reading and the beginning odometer reading.

(c) – (f) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-53. The Zip Code Delivery Points data included in OCA LR-4, fnlvoldj SAS database file, appear to come from the files in the Zip Code Delivery Points folder included in OCA LR-4, Section 2. Please provide your understanding of the following and the sources for your understanding.

- (a) The definition of and units of measurement for each type of delivery type - e.g., are these total addresses or stops, what are the distinctions among types of delivery, etc.
- (b) How were these variables were quantified over time
- (c) How the definitions and quantifications were standardized over time and over zips and routes
- (d) Any changes over time in how those definitions and quantification was made
- (e) Specific quality control procedures applied to these data and any changes over time I those procedures.

RESPONSE TO ADVO/OCA-T3-53

(a) The delivery points are defined as the number of delivery points by type of delivery technology.

(b) They were provided by the Postal Service. See Tr. 8D/4910.

(c) - (e) I have searched the testimony and interrogatory responses of the Postal Service in Docket No. R2005-1, which contained explanatory material about DOIS, but I have been unable to find an answer to your question.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-54. In OCA LR-4, fnlvoladj SAS database file, there is an "hunit" variable. This appears to come from the ahactzips.xls file in Section 2 of OCA LR-4. Please provide your understanding of the following and the sources for your understanding.

- (a) The definition of this variable
- (b) Source of this variable
- (c) Time period for which this variable is appropriate

RESPONSE TO ADVO/OCA-T3-54

(a) – (c) “hunit” is “housing units.” See my response to interrogatory USPS/OCA-T3-7.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-55. In OCA LR-4, fnlvoldj SAS database file, there is a "COMM" variable. This appears to come from the ahactzips.xls file in Section 2 of OCA LR-4. Please provide your understanding of the following and the sources for your understanding.

- (a) The definition of this variable
- (b) Source of this variable
- (c) Time period for which this variable is appropriate

RESPONSE TO ADVO/OCA-T3-55

(a) – (c) “COMM” is “commercial units.” See my response to interrogatory USPS/OCA-T3-7.

RESPONSES OF OCA WITNESS J. EDWARD SMITH  
TO INTERROGATORIES ADVO/OCA-T3-33-56

ADVO/OCA-T3-56. In OCA LR-4, finlvoldj SAS database file, there is a "Land" variable. This appears to come from the ahactzips.xls file in Section 2 of OCA LR-4. Please provide your understanding of the following and the sources for your understanding.

- (a) The definition of this variable, including what the area it is intended to cover and whether it includes both dry land and water
- (b) Identification of units of measurement
- (c) Source of this variable
- (d) Time period for which this variable is appropriate

RESPONSE TO ADVO/OCA-T3-56

- (a) Square miles of dry land in a ZIP code.
- (b) Square Miles.
- (c) - (d) See my response to interrogatory USPS/OCA-T3-7.