

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER AND ADVO (TW/ADVO/USPS-8 - 10)
(November 2, 2006)

The United States Postal Service hereby provides its response to the following interrogatories of Time Warner and Advo: TW/ADVO/USPS-8 - 10, filed on October 19, 2006. A partial objection to questions 8 and 9 was filed on October 20, and the provision of these responses is not intended to waive that objection.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 2, 2006

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TW/ADVO/USPS-8. Please refer to LR L-179 and the two SAS programs processing the inputs for the cost pool analysis:

StreetAnalysis_with_Swap.final.sas, and
Perform_Select_Street_Swap.final.sas.

We are having difficulty running these programs with your data sets. In the text description of L-179, on pages 2-3, it appears to indicate that the first program – StreetAnalysis is run first and Perform_Select runs second. However, when StreetAnalysis is run first, it stops processing before completion and the log notes that there was a missing data input file called New_Swap_Street6.csv at the point where the program stopped. After reviewing the second program – Perform_Select, it appears that the New_Swap_Street6.csv data set is an output of this program.

- (a) Do the processing descriptions on pages 2 and 3 match the program names associated with those descriptions or has there been a juxtaposition of names? Please explain.
- (b) Which program should be run first with Setod5.dat?

RESPONSE:

- (a) There has been an accidental juxtaposition of program names in LR-L-179, pages 2-3. A revised version of library reference USPS-LR-L-179 is being filed, which completely replaces the original version.
- (b) Perform_Select-Street_Swapfinal.sas is run first, and StreetAnalysis_with_Swap.final.sas is run second.

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TW/ADVO/USPS-9. Please refer to LR L-179 and the two SAS programs processing the inputs for the cost pool analysis:

StreetAnalysis_with_Swap.final.sas, and
Perform_Select_Street_Swap.final.sas.

The Perform_Select program appears to require another file called Dups_Total_NA_Street6.csv and a file called Street.Time.Maskedzips.xls. We cannot find these in LR L-179.

- (a) Has the Postal Service provided all the data, program files and documentation we need to replicate the results in LR L-179?
- (b) If so, please explain precisely where the above files can be found in the materials previously provided by the Postal Service and how they are used in the programs.
- (c) If not, please provide all additional data, program files, and documentation needed to do so.

RESPONSE:

- (a) Yes, using the revised LR-L-179.
- (b) Dups_Total_NA_Street6.csv is created during the run of the first SAS program, Perform_Select_Street_Swap.final.sas, and is then read in and used later in the same program. An additional file, Dups_Total_NA_After_Swap6_street.csv is also created in the Perform_Select SAS program. These files contain information on the scans for a route/day with identical time stamps. They are used to select the correct ordering of these scans, based on which ordering produces the lower error time for the scan sequences.

Street.Time.Maskedzips.xls is not used by either program. It is the output of the 2nd program, StreetAnalysis_with_Swap.final.sas, with route/day records outside of the study time period removed. The output

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file in the revised LR-L-179, Scanpools_Street_MaskedZips.xls, matches
this file.

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TW/ADVO/USPS-10. In response to ADVO/OCA-T3-15(c), Dr. Smith identifies a paper authored by Dr. Bradley, Mr. Jeff Colvin, and Ms. Mary Perkins and presented at the CRR I Conference in Berne, Switzerland, in June 2006. He indicates that it might be relevant to the issue of city carrier delivery modeling. Please provide a copy of that paper or its most recent version.

RESPONSE:

A draft version of that paper is attached electronically.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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