

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 MAJOR MAILERS ASSOCIATION'S REPLY TO OPPOSITION OF THE
POSTAL SERVICE TO MAJOR MAILERS ASSOCIATION MOTION
TO STRIKE ERRATA TO LIBRARY REFERENCES AND REBUTTAL
TESTIMONY OF WITNESS LOETSCHER
(December 19, 2006)

The United States Postal Service hereby provides its response to the Major Mailers Association's (MMA) Reply to the Opposition of the United States Postal Service to MMA's Motion to Strike Errata To Library References And Rebuttal Testimony Of Postal Service Witness Loetscher.

MMA's Reply alleges that the Postal Service has made material misrepresentations regarding the errata to witness Loetscher's rebuttal testimony and associated library references, filed December 13, 2006. However, a closer examination reveals that MMA's concerns are apparently a byproduct of its misunderstanding of the "alldata2" file in USPS-LR-L-34, and its confusion regarding the terms "site," "observation," "record," or "lines of data." The Postal Service's Response today is an attempt to clear up this confusion and truly "set the record straight."

As explained by witness Loetscher under cross examination by MMA (Tr. 38/13283-4), each observation (or site) in the “site” column of the alldata2 file may contain multiple lines of data (or records) in the file. For example, the observation referred to by MMA in its Reply, labeled 1533, is a duplicate of the observation labeled 1783. Each of those observations contained 64 identical lines of data. In the Postal Service’s December 13 errata, observation 1533 was completely removed, along with its corresponding 64 lines of data, because it was a duplicate observation.

In total, and as explained in the Postal Service’s filings, six duplicate observations were removed from the original filing, which originally included a total of 1,789 observations. Observation 1533 was but one of those six duplicates. Those six duplicate observations correspond to 118 duplicate lines of data,¹ and the original version of the alldata2 file contained a total of 19,803 lines of data. Thus, by a rough calculation, ***less than one percent*** of the original data, in terms of either observations (6 out of 1,789) or lines of data (118 out of 19,803), were found to be duplicates and were removed in the Postal Service’s December 13 errata.

Nevertheless, the Postal Service herein incorporates by reference the arguments contained in its December 15, 2006 Opposition to MMA’s Motion to Strike, and reiterates its position that it would not object if the Presiding Officer were to allow the original versions of USPS-LR-L-34, USPS-LR-L193, and USPS-RT-9 to remain on the record along with the revised versions. Thus, if any

¹ These 118 duplicates include the 64 “instances of duplicate volume reports” referred to by MMA. MMA Reply at 2.

party wishes to further criticize Postal Service witness Loetscher, the “USPS BRM Team,” or any data set in this docket, that party may do so on brief with its preferred versions of the above-referenced files.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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