# DOCKET SECTION

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

Nov 24 4 51 PM '97

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POSTAL RATE AND FEE CHANGES, 1997

PESTAL BALL OF MERICAN OFFICE OF THE SECOND CALL Docket No. R97-1

## NOTICE OF THE UNITED STATES POSTAL SERVICE CONCERNING MISSING PAGE IN RESPONSE TO TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 6, QUESTION 1 (November 24, 1997)

On November 20, 1997, the United States Postal Service filed its response to

Question 1 of Presiding Officer's Information Request No. 6, dated November 13, 1997.

Today's telephone traffic suggests that page 2 of the text of that response was

not included in some copies received by persons on the service list. All three pages of

the response to POIR 6, Q 1 are being sent to the printer again with the expectation

that they will included herein and served upon the parties.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

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## RESPONSE OF U.S. POSTAL SERVICE WITNESS SMITH TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 6

Please refer to USPS LR-H-111, Dropship Savings in Periodicals and Standard 1. Mail (A), Appendix F, which has five pages. Refer also to the spreadsheet showing the actual calculations behind this appendix. The first column on the first page shows productivities in "units per manhour." The second column shows deflated productivities under the heading "with variability." The spreadsheet shows these deflated productivities to be equal to the multiplicative product of the column 1 productivities and witness Bradley's (USPS-T-14) cost variabilities. Apparently, the deflated productivities are meant to reflect the lower levels of volume variable costs that result from witness Bradley's lower cost variabilities for mail processing. On pages 3 and 4 the wage rate (with adjustments) is divided by the deflated productivities to obtain dollars per unit, which is further converted into dollars per piece. A wage rate divided by a deflated productivity yields a larger cost savings. However, the effect of reduced cost variabilities should be smaller cost savings. The Postal Service is asked to provide a rationale for the sequence of manipulations that leads to inflated cost savings due to reduced cost variabilities.

#### **RESPONSE:**

An examination of Appendices F and G, concerning Periodicals Regular and Nonprofit dropship nontransportation cost avoidances indicates that the application of witness Bradley's variabilities was done incorrectly. I concur that the effect of reduced cost variabilities should be smaller cost savings, as compared to the cost savings with 100 percent cost variability. The calculations which are shown in the original LR-H-111 (now incorporated into USPS-ST-46), as indicated in the question, have in fact increased the cost savings due to the application of the variabilities. As a consequence, the originally filed cost avoidances were, regrettably, significantly

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overstated. Correcting this error leads to a large downward revision in the cost avoidances. Revised pages for the USPS LR H-111 (now incorporated into USPS-ST-46) are being filed to reflect these changes. The following tables summarize the nontranportation dropship cost avoidances, as originally filed and as revised.

#### Costs Avoided for Periodicals Regular Dropshipping (Nontransportation)

| Point of Dropshipment            | As Filed 7/10 | <u>Revised 11/20</u> |
|----------------------------------|---------------|----------------------|
| Destination SCF                  | \$0.0522      | \$0.0204             |
| <b>Destination Delivery Unit</b> | \$0.0984      | \$0.0390             |

#### Cost Avoided for Periodicals Nonprofit Dropshipping (Nontransportation)

| Point of Dropshipment     | <u>As Filed 7/10</u> | <u>Revised 11/20</u> |
|---------------------------|----------------------|----------------------|
| Destination SCF           | \$0.0477             | \$0.0189             |
| Destination Delivery Unit | \$0.0904             | \$0.0361             |

One other substantive change to USPS-LR- H-111 is being filed today in conjunction with the November 17, 1997, response to ANM/USPS-ST46-1. In responding to this question, it was determined that the destination entry profile for Nonprofit mail (from Table 18 of LR-H-195) had been erroneously omitted from the top portions of Tables 1,2, and 3 in USPS L H-111, Appendix E. Only the destination entry profile data for Regular from Table 18 of LR-H-105 had been incorporated. Revised Tables 1, 2, and 3 of Appendix E in LR H-111 lead to revisions in the costs associated with container

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handling costs as calculated in Appendix D. This occurs due to changes in the probability associated with each operation (column one of the pages in Appendix D) change. The results of the changes in Appendix D are reflected in the revised pages of Appendix C. The impact of this change on the cost avoidances is very small. The impact is that the Destination SCF cost avoided declines from 11.05 cents per pound to 11.04 cents per pound and Destination Delivery Unit cost avoided declines from 13.79 to 13.78 cents.

#### CERTIFICATE OF SERVICE

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

<u>- Michael T. Tidwell</u>

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 November 24, 1997

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