DOCKET SECTION

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

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS THOMPSON
(USPS/OCA-T100—24-25)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of

the Special Rules of Practice, the United States Postal Service directs the following

interrogatories and requests for production of documents to the Office of the

Consumer Advocate witness Thompson: USPS/OCA-T100—24-25.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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January 14, 1998

USPS/OCA-T100-24.   Please refer to OCA-LR-4, pages 56-64 which contain the code listing for PESSA96P.FAC. The highlighted lines are the "changes made in the Commission's template to produce the OCA's R97-1 PESSA file."

a. Please confirm that there are 335 total lines of code listed. If this is not confirmed, please provide the correct total.

b. Please confirm that there are 162 lines of code that were changed. If this is not confirmed, please provide the number of lines that were changed.

c. Assuming that parts a and b are confirmed, please confirm that 48% of the lines were changed.

d. Please provide all analyses performed to arrive at the decision to change these particular lines. Please provide copies and documentation of all programming analyses, all tests performed, all edits, all hypotheses tested and an estimate of the amount of time expended for each of the stages of the analysis.

USPS/OCA-T100-25.   Please refer to pages 64-67 of OCA-LR-4.

a. It is indicated that Postal Service "variabilities are rounded to the nearest tenth of a percent", so OCA performed the following calculations. "[E]quipment and capital factor variabilities" are "manually calculated from Postal Service information. USPS-T-5, Workpaper A-3 at 19-26.1", and "square footage and rental variabilities" are "calculated from information provided in USPS-T-5, Workpaper A-3 at 3-16.1".

   1. Did you examine the variabilities that were actually used in the Postal Service's model, for example, whether or not the Postal Service variabilities are rounded to tenths, hundreds, thousands, etc.? If the response is affirmative, please provide complete citations to the Postal Service documents that contain this information. If the response is anything other

than affirmative, please provide all reasons why such an examination was not undertaken.

2. Please provide all the analyses performed to decide which variabilities would be used in the OCA model. Please provide copies and documentation of all programming analysis, all tests performed, all edits, all hypotheses tested and an estimate of the amount of time expended for each of the stages of the analyses.

b. Please refer to the statements found on page 65: "[t]wo statements "nk,2174,902,3,7,24,29" and "la,2328,2153,159,2174,v" highlighted above are deleted from PESSA96P.FAC. The statements are not needed in this docket." Please provide a complete explanation of why these statements are not needed in this docket. In your explanation, please address what has changed in the Postal Service model to allow the statements to be deleted and provide complete citations to the Postal Service documents containing this information.

c. Please refer to the following statements on page 65: "[t]he statement "xs,2177,21,601,...,604,701,...,713, 901,902,1001,1002" and "fm,176,2177,1" build the factor identified as 176. Factor 176 is subsequently used as a distribution key for the statement "la,2242,2199,43,2141,b,176. See USPS-T-5, Workpaper A-3 at 15-16.1."

1. Please confirm that not one of the components listed in: "601,...,604,701,...,713, 901,902,1001,1002" appears on pages 15-16.1 of USPS-T-5, Workpaper A-3.

2. If the response to part 1 is confirmed, please fully explain how the citation to USPS-T-5, Workpaper A-3 adds to the understanding of the OCA's program coding for those lines.

3. Regardless of whether the response to part 1 is confirmed, if possible, please

provide the citation to the pages in Postal Service documents containing the

information that would be helpful in understanding OCA's programming code

on these lines.

d. Refer to the statement on page 66: "Due to internal program memory limitations,

some PESSA96P.FAC statements refer to segment 22 components previously

used....BY96LP.LR printout of segment 22 shows the results of the last calculations

performed and stored in each component (see tab BY96LP.LR)."

1. Has this "memory limitation" caused any programming or execution problems

with the Commission's model? If the response is affirmative, please explain

in detail how the problems were solved and provide an estimate of how much

time was expended solving these problems. If the response is anything other

than affirmative, was the statement made solely to indicate the possibility of a

problem?

2. Has there been any study to determine whether or not the "memory limitation"

will cause any programming or execution problems in the future? If the

response is affirmative, please provide all analyses, documentation and an

estimate of the amount of time spent studying this issue. If the response is

anything other than affirmative, please provide an explanation of why the

decision was made that this issue need not be addressed.

3. Please confirm that the results of all program executions prior to the final one

are lost and cannot be viewed in BY96LP.LR or elsewhere in OCA-LR-4.

e. Please confirm that, in the first sentence of the second full paragraph on page 67, the reference should be to "component 1820" rather than "segment 1820."

f. Please refer to the statement on page 67 that: "the Commission's single-subclass stop costing methodology is not incorporated. Therefore, component 705 has a value of zero. Running the Commission's cost model program with the "la,2279,2006,170,705,a" statement generates a program error message."

   1. Were there any other error messages that were generated at this stage of processing the OCA's cost model? If the response is affirmative, please provide a list of all error messages generated.

   2. Did the presence of component 705 cause any error messages to be generated anyplace else in the OCA's cost model, whether in the base year or the rollforward years? If the response is affirmative, please provide a list of all error messages resulting from the presence of component 705, and provide citations to where they occurred in the program. If the response is anything other than affirmative, please provide an explanation of why there were no other errors, for example, in the case of piggybacks.

   3. Was any analysis performed at the time OCA-LR-4 was being produced to study if there were any other cause(s) of these error(s) besides, or in addition to, component 705? If the response is affirmative, please provide copies and documentation of all tests performed, all hypotheses tested and an estimate of the amount of time expended for each of the stages of the analysis. If the response is anything other than affirmative, please explain in detail the reasons why it was decided that component 705 was the cause of all the error messages.

   4. Was any analysis performed to understand how much time would be devoted to incorporating the Commission's single-subclass stop costing methodology into

the OCA's model after this methodology was removed to replicate the Postal Service's

results? If the response is affirmative, please provide an estimate of that amount of

time.

CERTIFICATE OF SERVICE

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

Susan M. Duchek

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