

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

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 SMITH
(USPS/OCA-T600-9-15)

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 Smith: USPS/OCA-T600-9-15.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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January 27, 1998

USPS/OCA-T600-9. Please refer to your testimony at page 35, line 9 where you state:

Given witness Moden's testimony, it is reasonable to question whether MODS facilities are in fact representative of non-MODS facilities.

Please confirm that it is your testimony that there is no reason to believe that the variabilities are the same at MODS offices and non-MODS offices. If you do not confirm, please explain how the variabilities could be the same despite the apparent differences that you discuss.

USPS/OCA-T600-10. Are you familiar with the econometric term "observational equivalence." If so, please provide a precise definition of the term.

USPS/OCA-T600-11. Please refer to page 3 of 8 in OCA 602.

- a. Please confirm that you could not visually inspect the pattern for 18,818 data points because they are hidden and do not appear on the plot. If you do not confirm, please explain what the term "NOTE: 18818 obs hidden." means.
- b. Please confirm that the letter "Z " appears in the plot about 100 times. If you do not confirm, please provide the number of times the letter "Z" appears in the plots.
- c. Please explain the significance of the letter "Z" in the plot.

USPS/OCA-T600-12. Please refer to page 2 of 19 in OCA 603.

- a. Please confirm that you produced hundreds of plots for each of the mail processing activities you reviewed. If you do not confirm, please provide the number of plots you produced for each of the activities that you reviewed.
- b. Did you review all of the plots that you produced? If you did not review all of the plots, please explain why.
- c. What was the average amount of time it took you to review a plot? Please explain fully.

USPS/OCA-T600-13. Please refer to page 1 of 19 in OCA 603 where you state:

A plotting of data points which ultimately has a positive intercept on the dependent variable, the hours-axis, is consistent with witness Bradley's fixed effects conclusions.

Please confirm that it is your testimony that data consistent with the fixed effects model should generate a data plot for each site that has a positive intercept on the hours-axis. If you do not confirm, please explain the above quote.

USPS/OCA-T600-14. Please refer to page 1 of 19 of OCA 603 where you state:

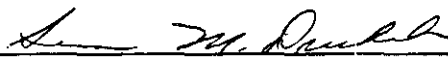
Finally, a plotting of data points essentially through the origin is consistent with the pooled case.

Please confirm that it is your testimony that data consistent with the pooled model should generate a data plot for each site that essentially goes through the origin. If you do not confirm, please explain the above quote.

USPS/OCA-T600-15. Please refer to the graphs in OCA 603. The titles of those graphs state: "Data Are In Logs." The scales of the axes of the graphs, however, appear to be in levels. Please clarify.

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.



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