

# DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE CHIEF COUNSEL  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS THOMPSON  
(USPS/OCA-T100-26-30)

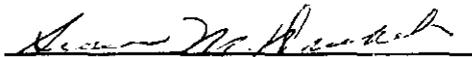
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Thompson: USPS/OCA-T100-26-30.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Susan M. Duchek

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January 29, 1998

USPS/OCA-T100-26. Please refer to your response to USPS/OCA-T100-2.

- a. Please confirm that in addition to the "C language program," other software was used in the production of the OCA's cost results.
- b. If subpart a. is confirmed, please provide a full description of the additional software (for example, SAS, EXCEL, etc.).
- c. If subpart a. is not confirmed, please explain fully.

USPS/OCA-T100-27. Please refer to your response to USPS/OCA-T100-3g. The response states that "Postal Service component 58 was associated with PRC components 901 and 2159" and then provides a clarification of what a duplicate entry in COMP.TXT would look like given information used in Docket No. MC96-3. The original question states:

"In light of the explanation on pages 8-9 of OCA-LR-4 that the USPS component 58 is associated with both Commission components 901 and 2159, please explain your understanding of USPS components 58 and 61, and of Commission components 901 and 2159. Include in your explanation your definition of each of the components, and the volume variable and accrued dollar amounts for each component as shown in the Manual Input Requirement for both the Postal Service's and the OCA's cost model."

Please provide a complete response to the question originally posed, which specifically defines Commission components 901 and 2159, Postal Service components 58 and 61 and which shows the volume variable and accrued dollar amounts for each of these components as shown in the Manual Input Requirement for both the Postal Service's and the OCA's cost model.

USPS/OCA-T100-28. Please refer to your response to USPS/OCA-T100-4 and the revised pages 10 and 11 of OCA-LR-6, section OCACOMP.XLS, filed January 13,

1998. Please also refer to workpapers A-1 and A-3 that accompany the testimony of Witness Alexandrovich, USPS-T-5.

- a. Please confirm that the following components appear in Witness Alexandrovich's workpapers A-1 and A-3:

<u>Workpaper A-1</u>		<u>Workpaper A-3</u>	
907	pp. 105-106	1307	pp. 105-106
913	pp. 107-108	1363	pp. 107-108
914	pp. 107-108	1314	pp. 107-108
915	pp. 109-110	1315	pp. 109-110
916	pp. 109-110	1316	pp. 109-110
917	pp. 109-110	1317	pp. 109-110
918	pp. 109-110	1318	pp. 109-110
919	pp. 109-110	1319	pp. 109-110
920	pp. 111-112	1320	pp. 111-112
921	pp. 111-112	1321	pp. 111-112
922	pp. 111-112	1322	pp. 111-112
923	pp. 111-112	1323	pp. 111-112
924	pp. 111-112	1324	pp. 111-112
926	pp. 113-114	1326	pp. 113-114
964	pp. 119-120	1364	pp. 119-120
966	pp. 119-120	1366	pp. 119-120
967	pp. 119-120	1367	pp. 119-120
971	pp. 109-110	1371	pp. 109-110.

If you do not confirm, please explain fully.

- b. Please confirm that the component pairings listed in part a. are the same "see also" component pairings that appear on the revised pages 10 and 11 of OCA-LR-6, section OCACOMP.XLS (revised 1/13/98). If you do not confirm, please explain fully.
- c. Please confirm that the component amounts are different within each component pairing shown on the cited Postal Service pages. For instance, component 907

from workpaper A-1 is different than component 1307 from workpaper A-3. If you do not confirm, please explain fully.

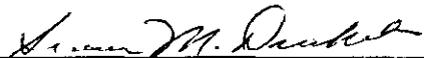
USPS/OCA-T100-29. Please refer to your response to USPS/OCA-T100-6.

- a. After receiving the Postal Service's response to OCA/USPS-T5-5a, did you determine that you should have used the Postal Service's I.DAT file? If not, please explain fully.
- b. Please confirm that the Postal Service's I.DAT file is identical to the Manual Input Requirement found in USPS-T-5, Workpaper A. If you do not confirm, please explain fully.

USPS/OCA-T100-30. Please refer to your response to USPS/OCA-T100-7d and the revised page 14 of OCA-LR-4, filed January 13, 1998. Please confirm that the third row of each component in BASEYEAR.DAT contains 4 data numbers followed by the component identifier. If you do not confirm, please explain fully.

## 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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Susan M. Duchek

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