

DOCKET SECTION

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

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Office of the Consumer Advocate

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

ANSWERS OF THE OFFICE OF THE CONSUMER ADVOCATE  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
WITNESS: PAMELA A. THOMPSON (USPS/OCA-T100-26-39)  
(JANUARY 30, 1998)

The Office of the Consumer Advocate hereby submits the answers of Pamela A. Thompson to interrogatories USPS/OCA-T100-26-39, dated January 16, 1998. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



KENNETH E. RICHARDSON  
Attorney  
Office of the Consumer Advocate

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-26. Please refer to OCA-LR-4, the first paragraph on page 68, and OCA-LR-6, page 12 of 12, of OCA's Updated Cost Roll-forward Model Component Titles and Numbers.

(a) Please confirm that the component numbers noted in the paragraph on page 68 of OCA-LR-4 refer to the identical component titles and numbers listed on page 12 of OCA-LR-6. If you do not confirm, please provide the titles associated with the component numbers listed on page 68 of OCA-LR-4.

(b) Please confirm that the Cost Segment 23 component list on page '12 of OCA-LR-6 includes "Seg. 2 Employee & Labor Relations 2301" and "Seg. 9 Special Delivery Fixed Attributable 2328", and these two components are not included in the list of components 2302 to 2327 of BY96LP.LR. If you do confirm, please fully explain why these two components are not included in BY96LP.LR. If you do not confirm, please explain how they are included in BY96LP.LR.

A. (a) Confirmed.

(b) Confirmed. The "Cost Segment" 23 component list you are referring to does include components 2301 and 2328. OCA-LR-4 at 68 does not include components 2301 and 2328 because they have a zero value. Segment 23 in OCA-LR-4 at tab BY96LP.LR does list component 2301 and 2328. For each component within segment 23 that does not have a zero value, 23:02 to 23:27, the PRC component number has been cited to the applicable Postal Service workpaper, page and component number.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-27. Please refer to the following statement on pages 68-69 of OCA-LR-4: "[e]ach column imported into this worksheet is moved within the worksheet - columns are placed in increasing cost component sequence (23:01 - 23:30)...[o]nce the EXCEL import is complete and components 23:01 through 23:30 are in increasing order, components 23:31 to 23:44 are deleted."

(a) Please confirm that the component numbers 23:01 - 23:28 correspond to the component numbers and titles listed for Cost Segment 23 on page 12 of OCA-LR-6. If you do not confirm, please provide a list of the component titles associated with the component numbers shown in the EXCEL spreadsheet.

(b) Please provide the component titles associated with component numbers 23:29 and 23:30 shown on the EXCEL spreadsheet.

(c) Please provide a list of the procedures that were accomplished to arrive at the process described on pages 68-9 of OCA-LR-4 to enable the production of the OCA's equivalent of the Postal Service's C Report. Please provide an estimate of the time required to perform each step in the procedure.

A. (a) Please note that your cite is incomplete. If you are referring to the component numbers and titles in OCA-LR-6, tab OCACOMP.XLS at 12, then confirmed.

(b) In the Base Year and in FY 97, component numbers 23:29 and 23:30 are not used. In FY 98, component 23:29 is used to store "Other Interest" and component number 23:30 is used to store "Imputed Special Assessments." See USPS-T-15, Workpaper G, B Report at 32.

(c) The procedures I followed are described in OCA-LR-4 at 68-69. To summarize them, they are: (1) Use the PRMAT.C program to create a LPRTMP file containing segment 23 and 24 data, (2) Import the LPRTMP file using EXCEL's Import Wizard Function, (3) Move columns of data in increasing numeric sequence, (4)

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

Delete extraneous columns, and (5) Group columns of data as required to replicate Postal Service Reports. I did not keep a log of the time I spent performing this task.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-28. Please refer to OCA-LR-6, footnote 2 on page 4. Please explain fully why DIST97.XLS "tries to re-establish links" when it loads. Do you know of any way to prevent this problem? If the response is affirmative, please provide a copy of the spreadsheet that loads without this problem. If the response is anything other than affirmative, has any effort been devoted to attempting to resolve this problem?

A. I do not know why DIST97.XLS tries to re-establish links when it loads. I did try to resolve this EXCEL linking problem but was unsuccessful.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-29. Please refer to OCA-LR-6, pages 7-8. On page 7, the following statement appears: "[v]olumes in component 2101 are revised to include the FY 96 non-RPW volumes for stamped envelopes, special handling and P.O. Boxes." On page 8, the following statement appears: "[t]he rollforward process starts by using the last Base Year data file ending with a "BIN" extension. In this docket, the last base year file is "BY96LP.BIN"."

(a) Please confirm that USPS Exhibit-15A (revised 8/18/97) shows the following Base Year 1996 volumes: stamped envelopes of 536.861, special handling of 68.175 and P.O. Boxes of 17211.937.

(b) Please confirm that BY96LP.BIN shows the following Base Year 1996 volumes: stamped envelopes of 0, special handling of 0 and P.O. Boxes of 0.

(c) Please provide the Base Year 1996 volumes used for the procedure described in this sentence from page 7 of OCA-LR-6: "[a]fter all volumes are updated, XREAD is re-run by typing "XREAD BASEYEAR.DAT."

A. (a) Confirmed.

(b) Confirmed.

(c) The volumes used in the roll forward files are provided on the diskette

accompanying OCA-LR-6 and are located in the file BASEYEAR.DAT. The Base Year

volumes used in the FY 97 BASEYEAR.DAT file for component 2101 are:

1-LETTERS & PARCELS	54,150,759
PRESORT LET & PAR	39,057,193
SINGLE PC CARDS	3,052,105
PRESORT PRI CDS	1,956,017
PRIORITY	937,273
EXPRESS	57,573
MAILGRAM	4,204
PERIODICAL -IN COUNTY	877,829
REGULAR RATE	6,984,301
NONPROFIT	2,205,180
CLASSROOM	58,885
STD A-SINGLE PIECE	145,807
REG ENH CAR RTE	29,180,737
REG STD OTHER	30,150,508

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

NP ENH CAR RTE	2,908,617
NP STD OTHER	9,300,466
STD B- PARCELS ZONE	212,828
BND PRNTD MATTER	516,111
SPECIAL RATE	189,793
LIBRARY RATE	30,133
USPS PENALTY	360,114
FREE FOR BLIND	49,969
INTERNATIONAL MAIL	1,053,071
SS-REGISTRY	18,623
CERTIFIED	270,832
INSURANCE	28,724
COD	4,866
SPECIAL DEL	382
MONEY ORDERS	214,029
STAMPED ENVLPS	536,861
SPECIAL HNDLG	68,175
POS OFFICE BOX	17,211,937
OTHER	0
TOTAL VOLUME	201,793,902

Please note that commas and data labels have been inserted for readability.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-30. Please refer to OCA-LR-6, pages 8-10, where the cost level effect in the rollforward model is described.

(a) Please confirm that the only changes to the Docket No. MC96-3, PRC-LR-5 file TYAR96P.FAC are for the percent change in the cost level. Another way of stating this is to confirm that there were no additions to, or deletions from, the components receiving a cost level effect.

(b) Please confirm that all of the components receiving a cost level effect in the Postal Service filename VBL1 receive a comparable cost level effect in the OCA model.

A. (a) As stated in OCA-LR-6 at 8-10, I replaced the cost level factors from FY96CP.FAC with commands similar to those used in TYAR96P.FAC. A comparison of TYAR96P.FAC shows that there were no additions to, or deletions from the section titled "cost level factors."

(b) As noted in OCA-LR-6 at 8, I used the factors provided in USPS Exhibit-15A at 1. If, after updating the cost level factors with USPS witness Patelunas' information, I had noticed problems with data replication, I would then have referred to USPS library references H-4 and H-6. I did not keep a log of problems so I do not know if I encountered any problems with USPS witness Patelunas' data. I have no reason to believe that components receiving a cost level effect in the Postal Service's filename VBL1 differ from those in the OCA model.



ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-31. Please refer to OCA-LR-6, page 10, where the following comments appear: "[d]uring the roll forward process, COSTMOD uses the "ripple" file RIPDAT1 to produce the following cost effects: mail volume, non-volume workload and additional workday. In this docket, the USPS instructions used in the OCA's RIPDAT1.DAT file come from the USPS library reference H-4 at 531-538, "MEMBER NAME VBL2", "op code" 21 and 18."

(a) Please confirm that on pages 531-538 of USPS library reference H-4, MEMBER NAME VBL2 defines procedures to be executed for only the mail volume effect in the Postal Service's cost model. If you do not confirm, please explain fully.

(b) Please provide your definition of "op code" as you use it in the above quote, and provide the citation to the USPS documentation that provides this information.

(c) Please explain your understanding of the function of "op code 21 and 18" and how the Postal Service's model accomplishes that function.

A. (a) It is my general understanding that the COSTMOD program uses ripple files to assist it in replicating Postal Service mail volume, non-volume workload and additional workday cost effects. I am unable to confirm whether or not VBL2 only contains procedures needed by the Postal Service's model to execute the mail volume effect. For purposes of my testimony, I did not need to know whether or not the Postal Service's cost model only used "VBL2" to define mail volume effect procedures in its cost model. As stated in my testimony, "The purpose of my testimony and library references ... is to explain the procedures I followed to update the Commission's version of the Postal Service cost model. OCA-T-100 at 3.

(b) & (c) My understanding of the "op code 21 and 18" comes from Docket No. R97-1, USPS library reference H-5, section 1 at 9. For purposes of my testimony, I did not need an in-depth understanding of the Postal Service's cost model operation. As previously stated, "The purpose of my testimony and library references ... is to explain

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

the procedures I followed to update the Commission's version of the Postal Service cost model." OCA-T-100 at 3.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-32. Please refer to the following statement on page 12 of OCA-LR-6: "[t]he first row of numbers "3,201,216,302,1,301" indicates that 3 components 201,216 and 302 are affected by 1 component -1. Similar logic applies to the remaining 19 rows."

(a) Please fully explain which of the cost effects described on page 10 -- mail volume, non-volume or additional workday - are calculated by the line of code "3,201,216,302,1,301".

(b) Please fully explain which of the cost effects are calculated by the remaining 19 rows of code.

A. (a) & (b) Please note that you have incorrectly quoted me. The correct quote is as follows: "[t]he first row of numbers "3,201,216,302,1,301" indicates that 3 components 201, 216 and 302 are affected by 1 component – 301. Similar logic applies to the remaining 19 rows." Please see my response to USPS/OCA-T100-31(a). The purpose of my testimony was not to provide extra documentation on the Commission's cost model. As previously stated, "The purpose of my testimony and library references ... [wa]s to explain the procedures I followed to update the Commission's version of the Postal Service cost model." OCA-T-100 at 3. The Postal Service has already expressed its satisfaction with the Commission's cost model documentation. Tr. 19C/9150. Understanding how the Commission's cost model code operates and how a specific line of code in a RIPDAT1.DAT file is used by the program was not necessary for purposes of my testimony.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-33. Please refer to the following from page 12 of OCA-LR-6: "[I]n USPS library reference H-6, \PSMANDO3\FY97RCC\STAT\VBL5 (hereafter, FY97RCC-VBL5) indicates that the volume mix and workyear mix adjustments use a different ripple file. The four Postal Service "op code" 21s in FY97RCC-VBL5 are replicated in the OCA's VOLRIP1 .DAT file. The VOLRIP1 .DAT file is used to incorporate the Postal Service's adjustments."

(a) Please confirm that FY97RCC-VBL5 defines the Postal Service cost model procedures that implement the cost reduction effects of the Volume Mix Adjustment developed in USPS library reference H-126. If you do not confirm, please explain fully.

(b) Please confirm that FY97RCC-VBL5 (see USPS-LR-H--4, pages 579-581) includes control string 18. Please explain fully why the OCA model includes only the four Postal Service "op code 21s" and excludes control string 18.

(c) Please confirm that FY97RCC-VBL5 does not define the Postal Service cost model procedures that implement the cost reduction effects of the Workyear Mix Adjustment calculated in USPS library reference H-12. If you do not confirm, please explain fully.

(d) Please provide complete citations to the Postal Service documentation where the Workyear Mix Adjustment procedures are defined.

(e) Please fully explain how the Postal Service's Workyear Mix Adjustment is incorporated in the OCA model.

A. (a) For purposes of my testimony, I did not rely on USPS library reference H-126; therefore, I am unable to confirm.

(b) Confirmed. Using "op code 21s" in VBL5 allowed me to successfully replicate Postal Service data; therefore, I did not use the "control string 18."

(c) For purposes of my testimony, I did not rely on USPS library reference H-12; therefore, I am unable to confirm.

(d) & (e) Apparently there is some confusion over my documentation. USPS library reference H-6, Section IV, Part B, Member Name "VBL5" at 604 contains a set of instructions. I converted the Postal Service component numbers into components used

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

by the PRC. Then I used the file I created to incorporate into the updated version of the Commission's cost model the Postal Service's Workyear Mix Adjustment. Since the OCA's cost model does not roll forward the Workyear Mix Adjustment, the instructions were input into the cost model in a separate cost model run.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-34. Please refer to pages 10-16 of OCA-LR-6.

(a) Please confirm that the following statement appears on page 10 of OCA-LR-6: "[d]uring the rollforward process, COSTMOD uses the "ripple" file RIPDAT1 to produce the following cost effects: mail volume, non-volume and additional workday."

(b) Please confirm that the following statement appears on page 14 of OCA-LR-6: "[a] copy of the FY97CP.FAC mail volume effect instructions follow".

(c) Please confirm that the following statement appears on page 15 of OCA-LR-6: "[a] copy of the updated non-volume workload instructions appearing in FY97CP.FAC follows".

(d) Please confirm the following statement appears on page 16 of OCA-LR-6: "[a] copy of OCA's updated additional workday instructions appearing in FY97CP.FAC follows".

(e) Please confirm that RIPDAT1.DAT and FY97CP.FAC are two distinct files and that they are used separately in the OCA's cost model. If you do not confirm, please explain fully.

A. (a) Confirmed.

(b) Confirmed.

(c) Confirmed.

(d) Confirmed.

(e) Confirmed.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-35. Please refer to the following from page 14 of OCA-LR-6: [s]ee USPS-LR-4 at 523-533. The instructions given to COSTMOD do not change total component costs; the intent is to redistribute existing costs." If the total component costs do not change, please explain fully how the existing costs are redistributed. Was the intention successfully accomplished?

A. The following sentence should be deleted from the paragraph: "The instructions given to COSTMOD do not change total component costs; the intent is to redistribute existing costs."

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-36. Please refer to these statements from OCA-LR-6 on page 15: "A description of the components impacted by the Postal Service's non-volume workload is provided in USPS library reference H-4, VBL3 at 539-543. The final three "nv" statements highlighted above, "nv, 1,215,0", "nv, 1,221,0" and "nv,1,225,0" are added to zero out the cost effect that occur in components 215, 221 and 225, thereby allowing the Commission's cost model to replicate the Postal Service data."

(a) Please confirm that the following Postal Service components are associated with the OCA components you discuss: 215 = 30, 221 = 674 and 225 = 678. If you do not confirm, please provide the Postal Service components associated with the OCA components you discuss.

(b) Please confirm that on pages 539-543 of USPS library reference H-4, VBL3 does not show any nonvolume workload effect for components 30, 674 or 678.

(c) Please explain fully what "cost effects that occur in components 215, 221 and 225" are zeroed out and why this needs to be done "to replicate the Postal Service data."

A. (a) Confirmed.

(b) I am unable to confirm, because I did not translate each line of Postal Service library reference H-4, VBL3. However, I have no reason to believe there was a nonvolume workload effect for Postal Service components 30, 674 or 678.

(c) I first attempted to replicate the Postal Service's nonvolume workload data using all the commands listed in OCA-LR-6 at 15, except for the following three: "nv,1,215,0", "nv,1,221,0" and "nv,1,225,0." In verifying my printout with the Postal Service's data, I determined that my data could more closely replicate that of the Postal Service.

It is my understanding that the Commission's cost model ripple files can impact the "nonvolume workload" section of the factor file FY97CP.FAC. Therefore, after several attempts, I found that adding the final three "nv" lines allowed the updated



ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

version of the Commission's cost model to more accurately replicate Postal Service data. I am unaware of what cost effects occur in components 215, 221 and 225.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-37. Please refer to pages 12-23 of OCA-LR-6 which describe the following steps:

1. executing the rollforward commands
2. verify cost level factors
3. building the cost model mail volume effect commands
4. verify mail volume changes
5. building the cost model nonvolume workload commands
6. verify nonvolume workload changes
7. building the cost model additional workday commands
8. verify additional workday changes
9. building the cost reduction commands
10. allocating the segment 2 cost reduction
11. allocating the segment 3 cost reduction
12. allocating the segment 6 cost reduction
13. verify cost reduction changes
14. building the other programs commands
15. verifying FY96LR.BIN

Please provide a complete list of all difficulties encountered while working through each of these steps and an estimate of the amount of time devoted to each step.

A. I did not keep a list of the difficulties I encountered while I worked through each of the steps listed, nor did I keep a log of the time I devoted to each step.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-38. Please refer to the following statements from page 24 of OCA-LR-6: "[w]hen I put Postal Service component 587 data in the Commission's component 2026, I got an error message regarding file size. Therefore, I put the Postal Service's other program amount of -88,017, for component 587 (Commission component 2026) in the Commission's component 2025. There is no adverse impact of putting -88,017 in component 2025 versus 2026."

(a) Please provide a complete explanation of why an error message regarding file size resulted from putting Postal Service component 587 data in the Commission's component 2026.

(b) Please provide a complete explanation of how the solution of putting the data in component 2025 was arrived at. Include in your explanation a complete list of other solutions that were attempted.

(c) Please confirm that page 10 of 12 of OCA-LR-6 shows the following information:

Cost Segment	Title	PRC Component Number	USPS Component Number
20	Other Accrued Expenses - Interest Expense -		
	Annuitant COLNHB Int.	2025	896
20	Imputed Int. Veh. Ld. & Bldg. Equip.	2026	587

If you do not confirm, please provide the correct information.

(d) Please confirm that the file by961p.bin shows the Base Year 1996 costs that are rolled-forward to FY 1997 in the OCA cost model. If you do not confirm, please provide the name of the correct file.

(e) Please confirm that in OCA-LR-4, page 24 of file by961p.bin shows component 2025 with 0 base year 1996 total costs and component 2026 is not listed. If you do not confirm, please provide the correct information and the source of that information.

(f) Please confirm that the file fy97vbr.bin shows the FY 1997 costs that are rolled-forward to Test Year 1998 in the OCA cost model. If you do not confirm, please provide the name of the correct file.

(g) Please confirm that in OCA-LR-6, page 24 of file fy97vbr. bin shows component 2025 with -88,017 FY 1997 total costs and component 2026 is not listed. If you do not confirm, please provide the correct information and the source of that information.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

(h) Please confirm that the file shown in Patelunas workpaper WP-A, Part 2 of 2 shows the Base Year 1996 costs that are rolled-forward to FY 1997 in the Postal Service cost model.

(i) Please confirm that Patelunas workpaper, WP-A, Part 2 of 2 shows component 587 with 368,039 base year 1996 total costs (page 854) and component 896 with 0 base year 1996 total costs (page 860).

(j) Please confirm that the file shown in Patelunas workpaper WP-B, shows the FY 1997 costs that are rolled-forward to Test Year 1998 in the Postal Service cost model.

(k) Please confirm that Patelunas workpaper, WP-B shows component 587 with 280,022 FY 1997 total costs (page 320) and component 896 with 0 FY 1997 total costs (page 324).

A. (a) When I was running the cost model, I was not sure why that error message occurred. I thought segment 20 had been allocated sufficient internal program memory, yet, I was aware that component 20:26 was not being printed. However, due to time constraints, I did not have time to analyze the problem further.

(b) When I encountered the problem discussed in part "a" of this interrogatory, I realized that component 2025 had a value of zero. I had two options, use component 2025 or see if a change to ROWCOL.H worked. When I evaluated changing ROWCOL.H, I felt that I would need to regenerate all previous printouts, re-verify the data and update my documentation. Using component 2025 appeared to be the more expedient alternative.

(c) If you are referring to OCA-LR-6, tab OCACOMP.XLS at 10, then confirmed.

(d) Confirmed.

(e) Confirmed.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

(f) Confirmed.

(g) Confirmed.

(h) Confirmed.

(i) Confirmed.

(j) Confirmed.

(k) Confirmed.

ANSWERS OF OCA WITNESS PAMELA A. THOMPSON  
TO INTERROGATORIES USPS/OCA-T100-26-39

USPS/OCA-T100-39. Please refer to the volume mix adjustments listed on page 26 of OCA-LR-6 and the control strings listed in MEMBER VBL5 on pages 578-581 of USPS-LR-H.4.

(a) Please confirm that the only source of the volume mix adjustment amounts used in the OCA cost model is USPS-T-15, WP-B on pages 3-4. If you do not confirm, please cite all other sources where this information is available.

(b) Please confirm that each of the volume mix adjustment amounts is entered individually into the OCA cost model. If you do not confirm, please explain fully.

(c) Please confirm that the only volume mix adjustment acted upon by the control strings listed in MEMBER VBL5 on pages 578-581 of USPS-LR-H.4 is factor 300 of MEMBER BEN2FACT, which can be found on page 586 of USPS-LR-H.4. If you do not confirm, please provide a complete list of all volume mix adjustments that are acted upon by the control strings listed for MEMBER VBL5.

(d) Please confirm that the amounts shown in USPS-T-15, WP-B on pages 3-4 are the result of the execution of MEMBER VBL5 on the factors shown in MEMBER BEN2FACT. If you do not confirm, please explain the source of the amounts shown in USPS-T-15, WP-B on pages 3-4.

A. (a) Not confirmed. I also referred to USPS-T-15, WP-B at 29-30, 35-36, 41-42, 60-61, 65-66, 71-72, 77-78, 83-84 and 97-98.

(b) Each amount is input using a set of "di/ds" commands.

(c) & (d) For purposes of my testimony, I did not need to understand how the Postal Service's control strings operate.

DECLARATION

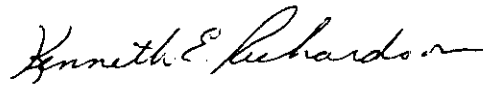
I, Pamela A. Thompson, declare under penalty of perjury that the answers to interrogatories USPS/OCA-T100-26-39 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed January 30, 1998

Pamela A. Thompson

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.

A handwritten signature in cursive script, reading "Kenneth E. Richardson".

KENNETH E. RICHARDSON  
Attorney

Washington, DC 20268-0001  
January 30, 1998