

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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-T100-45-52)
(FEBRUARY 10, 1998)

The Office of the Consumer Advocate hereby submits the answers of Pamela A. Thompson to interrogatories USPS/OCA-T100-45-52, dated February 3, 1998. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



KENNETH E. RICHARDSON
Attorney
Office of the Consumer Advocate

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TO INTERROGATORIES USPS/OCA-T100-45-52

USPS/OCA-T100-45. Please refer to your response to USPS/OCA-T100-11(d)2. Please confirm that your response means that by replicating the Postal Service's results, you have verified the Postal Service's underlying distribution keys. If you do not confirm, please explain fully.

A. 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's cost model. OCA-T100 at 3. After updating the Commission's cost model, I used Postal Service data to determine that the model successfully replicated USPS-T-5, Workpaper A and USPS-T-15, Workpapers A, B, C, F and G. My testimony does not evaluate the accuracy or the merits of the data presented by the Postal Service. If errors exist in the Postal Service's data, then my results are equally erroneous. Please see my testimony, footnote 2 at 4.

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USPS/OCA-T100-46. Please refer to your response to USPS/OCA-T100-15b-c. Please confirm that Attachment I to USPS Witness Patelunas's response to USPS/OCA-T5-3 provides the order in which the Postal Service's model execution produces the various files. If you do not confirm, please explain fully.

A. Attachment I of USPS/OCA-T5-3 "is a list of all the directories, subdirectories and file names found in Library Reference H-6." Response of Postal Service witness Patelunas. When I view Library Reference H-6, I am able to see the following directories "PS410D01, PS420D01, PS460D03, PSMAND01, PSMAND03." I am unable to see the following directories: "ALDRAN, LRH-6, and ADAHQN." In the left hand corner of the printout for USPS-T-5, Workpaper A, Manual Input Requirement, the following nomenclature appears: "USPS 10-4730, ALA430P1. The Manual Input Requirement page numbers range from 1 to 145.1. In the left hand corner of the printout for the USPS-T-5, Workpaper A, Factor Report, the following nomenclature appears: "USPS 10-4730, ALA430P1". The Factor Report page numbers range from 0.1 to 90.1 From the information provided on Attachment 1 of USPS witness Patelunas' response to USPS/OCA-T5-3 and the USPS-T-5, Workpaper A report nomenclature and page numbering, I am unable to determine what order the Postal Service's model executes and produces various files.

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USPS/OCA-T100-47. Please refer to your response to USPS/OCA-T100-15d-f which contains the following statement: "I began by accepting the Postal Service's Manual Input Requirement data." Please confirm that you did not accept any data other than those contained in the Postal Service's Manual Input Requirement that appears as Workpaper A-1 accompanying the testimony of Witness Alexandrovich, USPS-T-5. If you do not confirm, please provide a complete list of all additional Postal Service data you accepted and provide complete documentation to the Postal Service's source of that data.

A. Not confirmed. The program PREPROC.SAS uses the file COMP97.XLS to extract data from a Postal Service data file. Most of the data in the file BASEYEAR.DAT also appears in USPS-T-5, Workpaper A, Manual Input Requirement. However, Postal Service component 61 appears in USPS-T-5, Workpaper A, A Report at 53-54.1. My library references document all the data sources I used in replicating Postal Service results.

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USPS/OCA-T100-48. Please refer to your response to USPS/OCA-T100-17b which contains the statements: "for FY 97, I used both the USPS library references H-4 and H-6 to prepare the "ripple" instructions needed to replicate the Postal Service data. See OCA-LR-6 at 10-12." Please provide a complete explanation of how the information shown in OCA-LR-6 at 10-12 was used with USPS library references H-4 and H-6. In your answer, please use an example from OCA-LR-6 at 10-12: the component number from OCA-LR-6 from 10-12, the corresponding treatment in USPS library references H-4 and H-6, and how this treatment is implemented in OCA's cost model.

A. The first line of instructions on OCA-LR-6 at 11 is "3,201,216,302,1,301." The instruction indicates that "3" PRC components 201, 216 and 302 will be impacted by ("1") PRC component 301. (For purposes of my testimony, I did not need a further understanding of how the cost model uses the instructions it is given.) The information is provided in USPS library reference H-4 at 533 and in USPS library reference H-6, at PSMAND03\FY97rcr\STAT\VBL2.

<u>Postal Service Command</u>	<u>PRC Translation</u>
21	
0003 0001	3 1 = 3,201,216,302,1,301
0035	301
0004	201
0031	216
0036	302

The information following the "21" provides information used in the updated version of the Commission's cost model. The "0003 0001" tells me that "3" Postal Service components will be acted upon by "1" Postal Service component. The "1" component is Postal Service component 35 or PRC component 301. Postal Service component 35 impacts the following three Postal Service components: 4, 31 and 36.

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Postal Service component 4 = PRC component 201; Postal Service component 31 =
PRC component 216 and Postal Service component 36 = PRC component 302.

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USPS/OCA-T100-49. Please refer to your response to USPS/OCA-T100-17b. Did you generate every specific page of the Commission's model? If not, please specifically which printouts you generated.

A. Yes, I generated all printouts provided in OCA-LR-4, 6 and 7. Additionally, upon review of my response to USPS/OCA-T100-17b, and re-analyzing OCARIP1.DAT, I realize that I should elaborate on my response to USPS/OCA-T100-17b. USPS/OCA-T100-17b requests that a source be given for each line of code in OCARIP1.DAT, OCARIP2.DAT and OCARIP3.DAT. I indicated in USPS/OCA-T100-17b that I did not use USPS library references H-4 or H-6. However, I did use USPS library reference H-4, but not USPS library reference H-6.

In general, the ripple files from Docket No. MC96-3, RC95RIP1.DAT, RC95RIP2.DAT AND RC95RIP.DAT were copied and served as the template for OCARIP1.DAT, OCARIP2.DAT and OCARIP3.DAT. Lines were deleted as stated in OCA-LR-4. However, if a printout I generated did not match Postal Service data, I referred to USPS library reference H-4, Member Name A at 10-39.

USPS/OCA-T100-17b requested the complete citation from USPS library reference H-4 and H-6 for each line of code. An example was provided. The source of the example "4,201, 216, 219,302,1,301" is Docket No. MC96-3, PRC-LR-5, filename RC95RIP1.DAT. The line of information can also be translated from USPS library reference H-4, Member Name A at 23. The code is as follows:

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<u>Postal Service Command</u>	<u>PRC Translation</u>
02	
0004,0035	201,301 = 4,201,216,219,302,1,301
02	
0031,0035	216,301
02	
600,0035	219,301
02	
0036,0035	302,301

Another example of a command appearing in OCARIP1.DAT that came from Docket No. MC96-3, PRC-LR-5, filename RC95RIP1.DAT is:

"1,217,18,304,308,601,602,604,701,702,703,704,705,706,707,708,709,710,711,712,713."

The command was updated in OCARIP1.DAT to be

"1,217,17,304,601,602,604,701,702,703,704,710,705,705,707,708,709,711,712,713." The

line of information can be translated from USPS library reference H-4, Member Name A at 16. The code is as follows:

<u>Postal Service Command</u>	<u>PRC Translation</u>
04	Forming USPS component 0523 with 17
0523,0017	USPS components
0683	705
0639	711
0610	703
0684	709
0040	304
0043	601
0604	604
0044	602
0046	701
0047	702

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Postal Service Command (cont.)

PRC Translation (cont.)

0048		704
0049		706
0050		707
0051		708
0052		710
0053		712
0054		713
02		
0032,0523	=	1,217,17,304,601,602,604,701,702,703,704, 705,706,707,708,709,710,712,712,713

The two examples provided above provide information on my understanding of two types of Postal Service "ripple" commands appearing in USPS library reference H-4, Member Name A at 10-39. In the first example, the Postal Service did not build a new component. In the second example, Postal Service component 523 was created as a composite of 17 other Postal Service components.

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USPS/OCA-T100-50. Please refer to your response to USPS/OCA-T100-25(b), where you state "I did not know what function the "nk" statement performed." Do you now know what function the "nk" statement performs? If so, please explain in detail.

A. No.

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USPS/OCA-T100-51. Please refer to your response to USPS/OCA-T100-25(d)3. The original question sought to confirm the status of pre-final program executions in this docket, as opposed to what could happen in the future. Therefore, in terms of the program executions of the OCA's cost model in this docket, please confirm that all program executions prior to the final one are lost and cannot be viewed in BY96LO.LR or elsewhere in OCA-LR-4.

A. Please note that the final Base Year printout is BY96LP.LR. Confirmed.

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USPS/OCA-T100-52. Please refer to your response to USPS/OCA-T100-25(f)3 containing the following statement: "[I]f I removed a statement and the program ran successfully, I assumed the component with a zero value generated the error message." Is it your testimony that the Commission's cost model's integrity is maintained if statements are removed to eliminate processing errors? If your response is anything other than an unqualified affirmative, please fully explain how integrity is maintained.

A. "The purpose of my testimony and library references OCA-LR-4, OCA-LR-6 and OCA-LR-7, ... is to explain the procedures I followed to update the Commission's version of the Postal Service cost model." OCA-T-100 at 3. I updated the Commission's cost model and successfully replicated Postal Service results. In my testimony and library references, I did not incorporate the Commission's costing methodology. Postal Service interrogatory USPS/OCA-T100-25(f)3 referred to a line of computer instructions I removed from the input file -- "la,2279,2206,170,705,a." Following the logic I provide in the second paragraph of page 67 of OCA-LR-4, the line of computer instructions I removed would be interpreted as follows: (1) Multiply component 2206 by the factor in position number 170 of BY96CP.FAC; (2) The result of the calculation in (1) would then be distributed to component 2279 on the basis of the PRC component 705 distribution key. However, the distribution key, PRC component 705, has a value of 0. If the Commission's cost model attempted to execute that instruction, the computer would be told to divide by zero. Division by zero is an illegal operation. Consequently, a program error message results. I did not search further for

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other problems, because I found the problem. Removing the line in question resolved the error message.

I am puzzled by your use of the term "integrity." Adding or deleting instructions to an input file only impacts the program to the extent that it provides the program with commands to execute. The program is not changed. The program's "integrity" has not been altered.

DECLARATION

I, Pamela A. Thompson, declare under penalty of perjury that the answers to interrogatories USPS/OCA-T100-45-52 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed Feb 10, 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 that reads "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, DC 20268-0001
February 10, 1998