

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

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Mailing Online Service )

Docket No. MC98-1

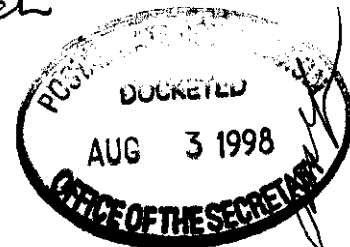
OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: ROTHSCHILD (OCA/USPS-T4-12-23)  
(August 3, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette  
Acting Director  
Office of the Consumer Advocate

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T4-12. Please refer to USPS-LR-2/MC98-1, page 4. The report states, that "a given level of statistical reliability could be achieved using a smaller sample in the survey."

- a. What did the Postal Service indicate was an acceptable level of statistical reliability?
- b. What level of statistical reliability was achieved given the smaller survey sample?
- c. What levels of statistical reliability were initially recommended by National Analysts, Inc.

OCA/USPS-T4-13. USPS-LR-2/MC98-1, page 4, indicates that the survey was targeted towards document producers in the continental United States that generate at least some NetPost-appropriate pieces, not to all document producers in the United States.

- a. Please explain why all 50 states within the United States were not included in the survey?
- b. Please explain what impact not addressing all 50 states had on the statistical validity of the survey results.
- c. Please explain what impact limiting the survey to NetPost-appropriate pieces as opposed to addressing all document producers in all 50 states had on the statistical validity of the survey results.
- d. In preparing the survey, was an assumption made that none of the non-NetPost document producers would prepare to "migrate" their documents to NetPost-appropriate pieces?

- e. If your response to part 'd' of this interrogatory is affirmative, please explain the rationale for assuming that non-NetPost document producers would not prepare to "migrate" their document to NetPost-appropriate pieces.
- f. If your response to part 'd' of this interrogatory is negative, then please explain the rationale for limiting the survey to document producers of NetPost-appropriate pieces.

OCA/USPS-T4-14. Please refer to USPS-LR-2/MC98-1, pages 6-7.

- a. In designing the survey sample, please explain why the estimated "appropriate universe size" (Table 2) used does not match the known D&B universe size (Table 1).
- b. Referring to part 'a' of this interrogatory, please explain what the statistical impact is upon survey results of changing the "known" D&B universe size to an "estimated" universe size.
- c. Who made the decision to change the estimated "appropriate universe size" from the known D&B universe size?
- d. At 6, "[t]he NetPost-appropriate universe size was estimated at the conclusion of data collection, based on the eligibility rates found during the screening process." Please explain the specifics of what analysis was performed to determine the estimated "appropriate universe size"?
- e. If any analysis was performed, and/or if any supporting documentation exists that relates to determining the "appropriate universe size," please cite the source and provide copies of all information not otherwise filed in this docket.

- f. If no supporting documentation or analysis was prepared to determine the estimated "appropriate universe size," please explain how the estimate was developed.

OCA/USPS-T4-15. Please refer to USPS-LR-2/MC98-1, page 7. "Quotas were also set for the number of respondents .... However, early field experience indicated that the incidence of companies that had NetPost-appropriate advertising mail, newsletters, and forms was so low that the number of screening interviews required to obtain 300 completed interviews for each would be prohibitive. Therefore, the quotas for interviews by application were revised ...."

- a. Please explain what impact the revised quota had on the statistical validity of the survey results when extrapolated out to the entire 50 states.
- b. If your response to part 'a' of this interrogatory is "insignificant" or can be interpreted as having a "similar" meaning, please explain why the sampling plan initially "called for 300 interviews to be completed for each of the five applications."

OCA/USPS-T4-16. The following refers to USPS-LR-2/MC98-1, page 7. Please refer to the following statement, "large organizations were oversampled in order to obtain a readable base for them, even though their likelihood of sending NetPost volume was believed to be lower than other size groups."

- a. Please explain who made the determination to "oversample" large organizations?

- b. Please explain the purpose of obtaining a “readable base” given that the “likelihood of sending NetPost volume was believed to be lower than other size groups.”
- c. What is the statistical impact on the validity of survey results as a consequence of over sampling a group that was expected to have lower NetPost volume?

OCA/USPS-T4-17. Section F of USPS-LR-2/MC98-1, indicates that the questionnaire was provided to the survey participant via a computer diskette. Please provide a copy of that diskette and a copy of any additional information included with the diskette.

OCA/USPS-T4-18. Section F of USPS-LR-2/MC98-1, indicates that the survey participant received a \$35.00 honorarium if the questionnaire was fully completed and returned within two weeks from its receipt.

- a. Why was an honorarium offered?
- b. Who determined the amount of the honorarium?
- c. What impact does offering a cash honorarium have on the statistical validity of the survey?
- d. If your response to part ‘c’ of this interrogatory is ‘none’ or can be interpreted similarly, please explain why someone filling out a questionnaire wouldn’t quickly provide just “any” response to each question and return the form for the cash honorarium. Include in your response a description of how the survey results were adjusted to address the possibility of “random” answers.

- e. Who determined whether or not a returned questionnaire was satisfactorily completed and met the return criteria and thus "earned" the honorarium?
- f. How many of the returned questionnaires were not eligible for the honorarium?
- g. Please refer to part 'f' of this interrogatory. Provide a table indicating the number of and the reason(s) for a returned questionnaire being declared ineligible for the honorarium.

OCA/USPS-T4-19. The following interrogatories refer to section E of USPS-LR-2/MC98-1.

- a. A review of the questionnaire, indicates that in order to complete the survey, a participant may have had to perform mathematical calculations. Please explain what steps were taken to verify the results of mathematical calculations on returned surveys.
- b. This question refers part 'a' of this interrogatory. If mathematical calculations were not confirmed, please explain why not? Include in your response, the statistical impact each incorrect mathematical computation would have upon the accuracy of the survey results.

OCA/USPS-T4-20. The following interrogatory refers to section E of USPS-LR-2/MC98-1. In reviewing a copy of Version 5 of the January 1997, questionnaire that was distributed to survey participants, it appears that a number of "branching decisions" needed to be made by a respondent. For example see the following comment from page 5, "IF YOU CHECKED Q.3C, SKIP TO THE ENHANCED NETPOST SERVICE ON PAGE 11." Please explain what methods of 'error' checking were performed to

ensure that the respondents understood and properly completed the “branching decision” questions.

OCA/USPS-T4-21. Please refer to USPS-LR-2/MC98-1, page 34. Please provide a breakdown of Total, First-Class, and Standard volumes in Table 15 by Application.

(See page 28, Table 10 for the five Application types.)

OCA/USPS-T4-22. Did any of your market research collect data that could be used to estimate frequency of transmissions by Mailing Online customers? If not, why not? If so, please provide such estimates, broken down by class of mail and application type if possible.

OCA/USPS-T4-23. Did any of your market research collect data that could be used to estimate current frequency of mailing by respondents? (See, e.g., USPS-LR-2/MC98-1, Tab E, page 2.) If not, why not? If so, please provide such estimates, broken down by class of mail and application type if possible.

Docket No. MC98-1

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.

  
Emmett Rand Costich  
Attorney

Washington, D.C. 20268-0001  
August 3, 1998