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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: BETH B. ROTHSCHILD (OCA/USPS-T4-24-29)
(August 4, 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.

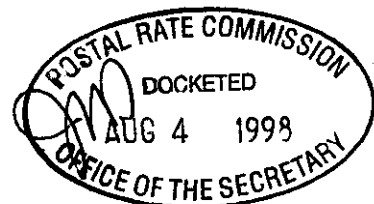
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director



OCA/USPS-T4-24. Please refer to Table 5 of USPS-LR-2/MC98-1, page 13.

- a. Please explain how the percentages shown in the column labeled "Produce Application" were developed.
- b. Refer to part 'a' of this interrogatory. Please provide copies of all analyses that were performed to develop the "Produce Application" percentages. Cite all sources and provide copies of all documents not previously filed in this docket.

OCA/USPS-T4-25. Please refer to USPS-LR-2/MC98-1, page 13. The following statement appears. "If an organization produced multiple applications, they were randomly assigned to one [application] using an algorithm which assigned respondents to low incidence applications with a greater probability than by chance alone."

- a. How many organizations produced multiple applications?
- b. Was any analysis performed on the types of organizations that had multiple applications? If so, please provide copies of all analyses. If not, why not.

OCA/USPS-T4-26. Please refer to USPS-LR-2/MC98-1, page 14, and the probabilities of selection assigned to each of the five applications for advertising (.33), invoices (0), forms (.19), newsletters (.22) and announcements (.26).

- a. Who defined the probabilities of selection for each of the five applications?
- b. Was any analysis performed to determine the appropriate probabilities assigned to each of the five applications? If so, please provide copies of all such analyses. If not, why not.

OCA/USPS-T4-27. Please refer to Table 6 of USPS-LR-2/MC98-1, page 16. The response rate to the USPS questionnaire is low.

- a. In your experience, is the response rate (39.6%) for returning the USPS computerized questionnaires a goal to aspire to? If not, what is the "normal" targeted response rate for a computerized questionnaire?
- b. In your experience, is the response rate (24.7%) for returning the USPS hard copy questionnaires a goal to aspire to? If not, what is the "normal" targeted response rate for hard copy questionnaire?
- c. Was any analysis performed to determine why the hard copy questionnaire response rate was lower than the computerized response rate? If so, please provide copies of all analyses performed. If not, why not.
- d. Was any analysis performed to determine why the overall USPS questionnaire response rate was only 36.1%. If so, please provide copies of all analyses performed. If not, why not.
- e. Since only 36.1% of the total questionnaires sent out were returned, please explain how realistic the survey results are.
- f. In your opinion, did the \$35.00 honorarium improve the survey response rate?

OCA/USPS-T4-28. The following interrogatory refers to USPS-LR-2/MC98-1, page 38, where the following statements appear: "[B]ootstrapping' is the customary, and preferred technique to use.... The computer programming and run time required for bootstrapping are substantial. Therefore, it was decided that an approximation of the standard error estimates, which could be produced with minimal effort, would suffice."

- a. Who made the decision to approximate the standard error estimates?
- b. Was the decision to approximate the standard error estimates made prior to the commencement of the NetPost survey?
- c. Was the decision to approximate the standard error estimates made after the survey response rates were known?
- d. If the response to part 'b' and 'c' of this interrogatory is negative, please explain at what stage of the survey was the determination made to approximate the standard error estimates.
- e. Was the decision to approximate the standard error estimates using minimal effort a reflection of the Postal Service's opinion of the statistical viability of the survey results? If not, please explain.

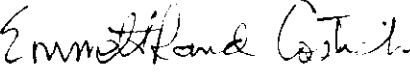
OCA/USPS-T4-29. The following interrogatory refers to USPS-LR-2/MC98-1, page 38-39, where the following statement appears: "To account for this disproportionate sampling, weights were assigned to each respondent in order to project the estimates to the correct eligible universe."

- a. Who developed the weights that were assigned to each respondent?
- b. Please explain how the weights were assigned to each respondent, show the weight derivation, cite all sources and provide copies of all sources not previously filed in this docket.

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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 4, 1998