

ORIGINAL

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

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Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SECKAR TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-17-18)

The United States Postal Service hereby provides the responses of witness Seckar to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-17-18, filed on November 16, 1998.

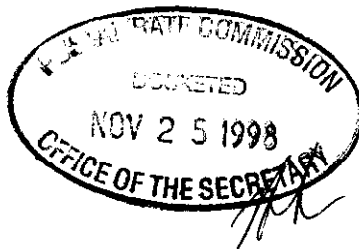
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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November 25, 1998

RESPONSE OF POSTAL SERVICE WITNESS SECKAR TO INTERROGATORY
OF THE OFFICE OF THE CONSUMER ADVOCATE

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OCA/USPS-T2-17. Please refer to your response to OCA/USPS-T4-39(d), (f), and (h), and USPS-T-2, Exhibit A, Table 4.

a. In Table 4, please confirm that the sum of pieces with 1-2 pages, 3-4 pages, 5-6 pages, 7-10 pages, 11-15 pages, and pieces with greater than 15 pages is 295,635,459 total pieces. If you do not confirm, please explain.

b. Using the number of total pieces from part a. of this interrogatory, please confirm that the percentage of pieces with 1-2 pages and "More than 15 pages" is 67.81678168 ($200,490,454 / 295,635,459$) and 7.05070507 ($20,844,384 / 295,635,459$), respectively. If you do not confirm, please explain.

c. Please confirm that your response to parts (d), (f), and (h), of OCA/USPS-T4-39 did not correct for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6. If you do not confirm, please explain.

d. For "Next-Day Delivery," please confirm that the correct volume for 1-2 page Simplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 29,895,946 ($44,083,404 * 67.81678168$). If you do not confirm, please explain.

e. For "Next-Day Delivery," please confirm that the correct volume for "More than 15 pages," Simplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 3,108,191 ($44,083,404 * 7.05070507$). If you do not confirm, please explain.

f. For "Next-Day Delivery," please confirm that the correct volume for "More than 15 pages," Duplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 3,360,469 ($47,661,453 * 7.05070507$). If you do not confirm, please explain.

RESPONSE:

- a. Confirmed.
- b. Both are confirmed.
- c. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using *total volume estimate* figures that witness Rothschild acknowledges are off

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as a result of rounding, my response to parts (d), (f), and (h), of OCA/USPS-T4-39 avoids this discrepancy by using the total volume estimate of 295,665,025 (rather than 295,635,459). In order to entirely avoid the use of any figure (e.g., "pieces with 1-2 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "pieces with 1-2 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.

- d. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using *total volume estimate* figures that witness Rothschild acknowledges are off as a result of rounding, your calculation can not be confirmed. In order to entirely avoid the use of any figure (e.g., "pieces with 1-2 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "pieces with 1-2 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.
- e. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total

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volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using *total volume estimate* figures that witness Rothschild acknowledges are off as a result of rounding, your calculation can not be confirmed. In order to entirely avoid the use of any figure (e.g., "more than 15 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "more than 15 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.

- f. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using *total volume estimate* figures that witness Rothschild acknowledges are off as a result of rounding, your calculation can not be confirmed. In order to entirely avoid the use of any figure (e.g., "more than 15 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "more than 15 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.

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OCA/USPS-T2-18. Please refer to your response to OCA/USPS-T4-40(d) and (f), and USPS-T-2, Exhibit A, Table 4.

a. In Table 4, please confirm that the sum of pieces with 1-2 pages, 3-4 pages, 5-6 pages, 7-10 pages, 11-15 pages, and pieces with greater than 15 pages is 295,635,459 total pieces. If you do not confirm, please explain.

b. Using the number of total pieces from part a. of this interrogatory, please confirm that the percentage of pieces with "More than 15 pages" is 7.05070507 (20,844,384 / 295,635,459). If you do not confirm, please explain.

c. Please confirm that your response to part (d) and (f) of OCA/USPS-T4-40 did not correct for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6. If you do not confirm, please explain.

d. For "Standard (Two-To-five Day) Delivery," please confirm that the correct volume for "More than 15 pages," Simplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 6,908,538 ($97,983,641 * 7.05070507$). If you do not confirm, please explain.

e. For "Standard (Two-To-Five Day) Delivery," please confirm that the correct volume for "More than 15 pages," Duplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 7,469,272 ($105,936,527 * 7.05070507$). If you do not confirm, please explain.

RESPONSE:

a. Confirmed.

b. Confirmed.

c. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using *total volume estimate* figures that witness Rothschild acknowledges are off as a result of rounding, my response to parts (d), (f), and (h), of OCA/USPS-T4-39 avoids this discrepancy by using the total volume

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estimate of 295,665,025 (rather than 295,635,459). In order to entirely avoid the use of any figure (e.g., "more than 15 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "more than 15 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.

- d. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using *total volume estimate* figures that witness Rothschild acknowledges are off as a result of rounding, your calculation can not be confirmed. In order to entirely avoid the use of any figure (e.g., "more than 15 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "more than 15 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.
- e. Not confirmed. It is unclear what exactly is meant by 'the discrepancy' in the above question. The discrepancy discussed in witness Rothschild's response to POIR No. 2, question 6 focuses exclusively on the total volume estimate of 295,665,025 and deviations from this figure as a result of rounding. Assuming that correction of the discrepancy implies not using

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total volume estimate figures that witness Rothschild acknowledges are off as a result of rounding, your calculation can not be confirmed. In order to entirely avoid the use of any figure (e.g., "more than 15 pages") that is affected by the rounding issue discussed by witness Rothschild, more decimal places would need to be used in the calculation of "more than 15 pages" such that the sum of all breakout categories would equal the total volume estimate figure of 295,665,025.

DECLARATION

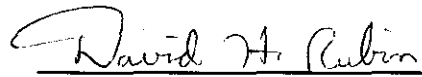
I, Paul G. Seckar, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Paul G Seck

Dated: NOVEMBER 25, 1998

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.



David H. Rubin

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November 25, 1998