

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

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS CARL G. DEGEN  
(OCA/USPS-T12-33-38)  
August 22, 1997

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 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

Attorney

OCA/USPS-T12-33. Please refer to page III-16 of library reference H-146 and to the program MODSHAPE of library reference H-218.

- a. Please confirm that the table on page III-16 is not produced by the SAS program MODSHAPE. If you do not confirm, please explain.
- b. Please refer to the attachment to this interrogatory. Please confirm that the values in this attachment are produced by the MODSHAPE program and should replace the values shown on page III-16 of H-146. If you do not confirm, please explain and provide any corrections to page III-16 so that it is consistent with the MODSHAPE program.

OCA/USPS-T12-34. Please refer to pages IV-4-7 of library reference H-146.

- a. Please confirm that these tables are not produced by the SAS program ADMWIN. If you do not confirm, please explain.
- b. Please provide any additional SAS statements necessary for program ADMWIN to produce the output of pages IV-4-7.

OCA/USPS-T12-35. Please refer to pages IV-1 - VIII-2 of H-146. These pages describe programs ADMWIN, WINACCPT, CMUCFS, PREMITOT, PIGGYF96, and NONMODEL.

- a. Please confirm that these programs are not discussed in your testimony. If you do not confirm, please provide a citation to where these are described.

- b. Please amplify on the "program objective" section provided in H-146 for each of these programs. Please explain explain in more detail what the program does, why it is necessary, and detail any changes in the program since R94-1.
- c. Please provide a citation to where the functions of each of these programs were performed and explained in R94-1.
- d. Please provide citations to where output of each of these programs is used by other witnesses or in other library references in this docket.

OCA/USPS-T12-36. Please provide the SAS log and program file for the MODSPOOL program of library reference H-146.

OCA/USPS-T12-37. Please refer to the program files included with library reference H-218. Please confirm that the following modifications must be made to these SAS program files in order for them to reproduce the output of library reference H-146 in a PC SAS environment:

- a. Please confirm that the "set" statement at line 16 of program MBC must be replaced with an "infile" and an "input" statement to read the HQTAL96.PRC file included in H-23. Please confirm that the "input" statement should be modeled on the "put" statement used to create HQTAL96.PRC. If you do not confirm, please explain.
- b. Please confirm that the 8-digit sequence numbers in columns 73-80 of each line of SAS code must be removed. If you do not confirm, please explain.

- c. Please confirm that some character comparison statements must be recoded to account for differences in the collating sequence for ASCII (PCs) and EBCDIC (mainframe) characters. For example, the statement "IF SUBSTR(POOL,1,1)>='0' THEN DELETE ;" would be recoded as "IF '0'<=SUBSTR(POOL,1,1)<':' THEN DELETE ;" in order to produce the same results under the ASCII character collating sequence of the PC environment. If you do not confirm, please explain.
- d. Please confirm these are the only modifications necessary in order to run the H-218 SAS programs in the PC SAS environment. If you do not confirm, please explain and provide any other necessary modifications.
- e. Please refer to the modified SAS programs filed as library reference OCA-LR-1. Please confirm that these SAS programs contain the modifications necessary in order to run the H-218 SAS program files successfully using PC SAS. If you do not confirm, please explain.

OCA/USPS-T12-38. Please refer to the documentation of program MODSPOOL at page I-6 of library reference H-146. This states that the program accesses the FY 96 MODS summary file.

- a. Please explain how this FY 96 MODS summary file is produced.
- b. Please confirm that this file contains just one record for each MODS code that contains the MODS code, the LDC code, and the total hours for FY 96. If you do not confirm, please explain what period of time the cost variable refers to.

- c. Please confirm that the FY 96 MODS summary file is produced by aggregating information from MODS files produced at a finer level of detail. If you do not confirm, please explain. If you do confirm, please describe how this file was created.
- d. Please describe the finest level of FY 96 MODS data available on computer files. For example, a file containing MODS hours and volume data by MODS code by AP by office is at finer level than a file containing MODS hours and volume data by MODS code for just one year.
- e. Please provide a data file of MODS data at the most disaggregated level available for FY 96. This file should include the MODS code, hours, and volume measures such as piece handlings. Finance numbers may be masked or recoded.

08:18 Thursday, August 21, 1997 22

DISTRIBUTION FACTORS FOR FIRST CLASS, SINGLE PIECE,  
 LETTER-SHAPED, INDICIA = METERED PRIVATE  
 AND ESTIMATED VOLUME-VARIABLE COSTS - FY 96 IOCS

----- INDICIA=METERED PRIVATE SHAPE=LETTER -----

OBS	COSTPOOL	VCOSTS	METD01	METD02	METRCOST
1	BMCS OTHR	789.21	147.88	599.62	194.64
2	BMCS PLA	142.40	53.70	53.70	142.40
3	BMCS SPB	202.69	27.78	126.45	44.53
4	BMCS SSM	104.22	53.37	53.37	104.22
5	MODS 1&21BULK PR	1242.77	277.50	759.54	454.05
6	MODS 1&21CANCMP	126132.60	27056.15	101339.18	33675.64
7	MODS 1&21EEQMT	11014.23	63.49	229.85	3042.34
8	MODS 1&21MISC	38718.98	1237.77	5383.16	8902.80
9	MODS 1&21OPBULK	32089.11	3711.66	11352.61	10491.31
10	MODS 1&21OPREF	147640.26	20427.96	59537.46	50657.00
11	MODS 1&21PLATFRM	143477.50	5341.02	16403.14	46717.68
12	MODS 1&21POUCHNG	111710.76	13288.26	34797.03	42660.00
13	MODS 1&21SACKS_H	12571.22	1363.10	4039.80	4241.75
14	MODS 1&21SACKS_M	5782.45	135.29	769.70	1016.36
15	MODS 1&21SCAN	14332.13	1012.90	2575.27	5637.06
16	MODS 1&21SUP OTH	0.00	72.48	283.06	0.00
17	MODS 1&21SUPPORT	39999.20	1380.06	4102.08	13456.94
18	MODS 1&2BCS/	341121.69	81743.39	206151.91	135261.63
19	MODS 1&2BUSREPLY	5601.85	559.75	3898.15	804.39
20	MODS 1&2EXPRESS	1301.13	135.66	737.70	239.28
21	MODS 1&2FSM/	13283.27	3511.97	7615.23	6125.95
22	MODS 1&2INTL	7144.78	1438.00	5286.06	1943.64
23	MODS 1&2LD15	274663.49	1550.42	4211.90	101104.56
24	MODS 1&2LD41	6578.71	2835.11	4906.25	4957.25
25	MODS 1&2LD42	631.84	628.24	1564.89	253.66
26	MODS 1&2LD43	125722.82	32931.13	77176.91	53645.51
27	MODS 1&2LD44	48920.78	16166.27	36782.97	21500.89
28	MODS 1&2LD48 EXP	115.78	51.30	51.30	115.78
29	MODS 1&2LD48 OTH	6185.26	4018.78	9675.96	2568.97
30	MODS 1&2LD48_ADM	0.00	2162.53	5636.32	0.00
31	MODS 1&2LD48_SSV	3597.77	2908.76	7088.12	1476.42
32	MODS 1&2LD49	66572.91	17219.06	41506.83	27617.69
33	MODS 1&2LD79	5804.40	269.45	1179.17	1326.36
34	MODS 1&2LSM/	491999.50	111184.56	328127.87	166711.69
35	MODS 1&2MANF	15178.98	3207.64	9855.68	4940.17
36	MODS 1&2MANL	616147.69	178029.34	509689.84	215213.96
37	MODS 1&2MANP	1441.03	379.96	1687.60	324.45
38	MODS 1&2MECPARC	658.40	166.22	370.37	295.48
39	MODS 1&2OCR/	118004.73	42444.47	90162.95	55551.07
40	MODS 1&2PRIORITY	2869.65	419.24	1795.03	670.23
41	MODS 1&2REGISTRY	1252.78	1267.69	2527.15	628.43
42	MODS 1&2REWRAP	6130.59	721.86	2283.35	1938.13
43	MODS 1&2SPBS OTH	2707.72	1037.46	2331.48	1204.88
44	MODS 1&2SPBSPRIO	521.78	137.01	151.92	470.59

08:18 Thursday, August 21, 1997 23

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----- INDICIA=METERED PRIVATE SHAPE=LETTER -----  
 (continued)

OBS	COSTPOOL	VCOSTS	METD01	METD02	METRCOST
45	NON MODS	632718.11	172851.92	492709.53	221969.61
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	SHAPE	3484827.15			1250299.38
	INDICIA	3484827.15			1250299.38
		=====			=====
		3484827.15			1250299.38

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 Paul Costello for*

KENNETH E. RICHARDSON  
Attorney

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