

Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS NORMA B. NIETO (OCA/USPS-T24-9-12)
(July 13, 2006)

Pursuant to Rules 25 through 28 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-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

Shelley S. Dreifuss, Director
Office of the Consumer Advocate

Kenneth E. Richardson
Attorney

901 New York Avenue N.W.
Suite 200
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6891
e-mail: richardsonke@prc.gov

OCA/USPS-T24-9. The purpose of this interrogatory is to attempt to understand the characteristics of window transactions as related to site size. Your answer to OCA/USPS-T24-6 indicates that 1535 transactions were not included in the final database of 7915 transactions.

- (a) How many of the 1535 transactions were from small sites, and how many were from large sites?
- (b) Of the 7915 transactions, how many of the transactions were from small sites, and how many were from large sites?

OCA/USPS-T24-10. The purpose of this interrogatory is to develop information on whether the database is adequate for the analysis. Your answer to OCA/USPS-T24-2 indicates that you did not perform an analysis of the number of transaction observations needed for each product but that, "Rather, the objective of the transaction time study was to create a database that contained sufficient transactions to allow an update of the established transaction time econometric model."

- (a) How did you determine that you had "sufficient transactions"?
- (b) Please explain the statistical methodology that you used to determine the number of sites, the number of observations per site, and the stratification that guaranteed a level of confidence (please state the level of confidence) that on a product-by-product basis you had "sufficient transactions."
- (c) Assuming that you had "n" types of transactions, with some transactions containing single products and some transactions containing multiple

products, please explain how you would determine the number of observations required for a statistically accurate sample.

OCA/USPS-T24-11. The purpose of this transaction is to develop data on the overall activities at locations. In OCA/USPS-T24-7 you provide by location and day the number of data collectors assigned to registers.

- (a) Please indicate, by location and day, the total number of hours for which a data collector collected data on transactions, including waiting times, breaks, and all other activities.
- (b) Please provide, by location and day, the total number of hours for which non-transactional time was measured, broken down by type of non-transactional activity.

OCA/USPS-T24-12. The purpose of this interrogatory is to obtain data on “walk” time, which appears to be an integral part of a transaction, given that a customer must walk to a window to perform a transaction. Please turn to your response to OCA/USPS-T24-3, where you indicate that “The “walk” part of the transaction was recorded for those transactions in which the walk was long enough to allow a data collector to record a separate measurement.” Please provide data for the “walk” part of the transaction for each of the 7915 transactions, recognizing that in many cases the “walk” time will be zero.