

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

FEB 15 9 41 AM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

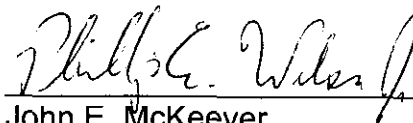
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

SECOND SET OF INTERROGATORIES FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS XIE
(UPS/USPS-T1-2 through 17)
(February 15, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Xie: UPS/USPS-T1-2 through 17.

Respectfully submitted,



John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS XIE

UPS/USPS-T1-2. Provide all input data files necessary to execute all the computer programs submitted in USPS-LR-I-49. Each file should be in ASCII format. Files should be provided for all quarters, not just the quarter referenced in the source code files.

UPS/USPS-T1-3. Provide all output data files and SAS log files generated by the computer programs submitted in USPS-LR-I-49, for all quarters. Each file should be in ASCII format. For those data files already provided in a form other than ASCII, provide them again in ASCII format.

UPS/USPS-T1-4. For the source code submitted in USPS-LR-I-49, confirm that all source code files can be applied to data for quarters other than those specified in the submitted code, by redefining the file references. If not confirmed, provide all source code files for all quarters.

UPS/USPS-T1-5. Provide all input data files necessary to execute all the computer programs submitted in USPS-LR-I-50. Each file should be in ASCII format. Files should be provided for all quarters, not just the quarter referenced in the source code files.

UPS/USPS-T1-6. Provide all output data files and SAS log files generated by the computer programs submitted in USPS-LR-I-50, for all quarters. Each file should be in ASCII format. For those data files already provided in a form other than ASCII, provide them again in ASCII format.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS XIE

UPS/USPS-T1-7. For the source code submitted in USPS-LR-I-50, confirm that all source code files can be applied to data for quarters other than those specified in the submitted code, by redefining the file references. If not confirmed, provide all source code files for all quarters.

UPS/USPS-T1-8. Provide all input data files necessary to execute all the computer programs submitted in USPS-LR-I-51. Each file should be in ASCII format. Files should be provided for all quarters, not just the quarter referenced in the source code files.

UPS/USPS-T1-9. Provide all output data files and SAS log files generated by the computer programs submitted in USPS-LR-I-51, for all quarters. Each file should be in ASCII format. For those data files already provided in a form other than ASCII, provide them again in ASCII format.

UPS/USPS-T1-10. For the source code submitted in USPS-LR-I-51, confirm that all source code files can be applied to data for quarters other than those specified in the submitted code, by redefining the file references. If not confirmed, provide all source code files for all quarters.

UPS/USPS-T1-11. Provide all input data files necessary to execute all the computer programs submitted in USPS-LR-I-52. Each file should be in ASCII format. Files should be provided for all quarters, not just the quarter referenced in the source code files.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS XIE

UPS/USPS-T1-12. Provide all output data files and SAS log files generated by the computer programs submitted in USPS-LR-I-52, for all quarters. Each file should be in ASCII format. For those data files already provided in a form other than ASCII, provide them again in ASCII format.

UPS/USPS-T1-13. For the source code submitted in USPS-LR-I-52, confirm that all source code files can be applied to data for quarters other than those specified in the submitted code, by redefining the file references. If not confirmed, provide all source code files for all quarters.

UPS/USPS-T1-14. Provide all input data files necessary to execute all the computer programs submitted in USPS-LR-I-53. Each file should be in ASCII format. Files should be provided for all quarters, not just the quarter referenced in the source code files.

UPS/USPS-T1-15. Provide all output data files and SAS log files generated by the computer programs submitted in USPS-LR-I-53, for all quarters. Each file should be in ASCII format. For those data files already provided in a form other than ASCII, provide them again in ASCII format.

UPS/USPS-T1-16. For the source code submitted in USPS-LR-I-53, confirm that all source code files can be applied to data for quarters other than those specified in the submitted code, by redefining the file references. If not confirmed, provide all source code files for all quarters.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS XIE

UPS/USPS-T1-17. Refer to page 13 of your testimony, where you describe the structure of the route network for the Eagle and Western dedicated networks.

Specifically, you state that "Unlike commercial airline flights, network flights are dedicated fully to transporting mail between the hub and one or more cities in the network. The hub for the Eagle Network is Indianapolis, Indiana; for the Western Network, it is Oakland, California."

(a) How long have Indianapolis, Indiana, and Oakland, California, been the hubs for the Eagle and Western networks, respectively?

(b) Is it the case that Indianapolis, Indiana, and Oakland, California, have been the only hubs for the Eagle and Western networks, respectively, during the period from 1996 through the present? If not, identify any other hubs in operation during this period and specify the time periods during which they were in operation.

(c) List the destination cities served at present by the Eagle network and, separately, by the Western network. Is it the case that all destinations are served only by aircraft traveling directly between hub and a single destination point? If not, identify any cities served by the Eagle network and/or the Western network that do not have service connecting them directly (i.e., non-stop) to the hubs. Describe how each is connected to the network.

(d) Describe by network any changes in the destinations served by each of these dedicated networks during the period from 1996 to present. In particular, list any destinations that have been added or removed from each network in this period,

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS XIE

or that have seen a substantive change in the nature of their connection with the hub.

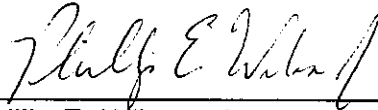
Also, list the dates when such changes were made.

(e) For each destination served by these dedicated air networks, list for each network the number of flights per day to that destination and the approximate times of those flights. Have there been any changes in the number of flights per day to any destination served by either of these networks during the period from 1996 to the present? For every destination served by either of the two networks, list all changes in the number of flights serving the destination in this period and the dates on which those changes were made.

(f) List the aircraft types that are used for the operation of the Eagle network and, separately, for the Western network. For each destination, list the aircraft type or types that serve that destination. Identify by network any changes in either the number of aircraft or in the types of aircraft used by these networks during the period from 1996 to the present, and identify the time periods that different aircraft were in operation.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: February 15, 2000
Philadelphia, Pa.

59280