BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE GOHERSHOR 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 BOZZO (UPS/USPS-T15-2 through 8) (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 Bozzo: UPS/USPS-T15-2 through 8.

Respectfully submitted,

John E. McKeever William J. Pinamont

Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

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Of Counsel.

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

UPS/USPS-T15-2. For the <u>Installation Master File</u> referred to at pages 89 and 94 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
 - (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
 - (d) Describe the universe of installations contained in the file; and
 - (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-3. For the <u>Management Operating Data System</u> initially referred to at page 1 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
 - (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
 - (d) Describe the universe of installations contained in the file; and
 - (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-4. For the <u>Address Information System</u> referred to at pages 89-90 of your testimony:

(a) List the full set of variables contained in the file, along with their definitions;

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

- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
 - (d) Describe the universe of installations contained in the file; and
 - (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-5. For the <u>Address List Management System</u> referred to at pages 89 and 90 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions:
 - (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
 - (d) Describe the universe of installations contained in the file; and
 - (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-6. For the <u>National Workhour Reporting System</u> referred to at pages 89 and 91-92 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
 - (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;

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- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-7. For the <u>Personal Property Asset Master</u> referred to at pages 89 and 93-94 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions:
 - (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
 - (d) Describe the universe of installations contained in the file; and
 - (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-8. For the <u>Facility Master System</u> referred to at pages 89 and 93 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
 - (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
 - (d) Describe the universe of installations contained in the file; and
 - (e) Provide any manuals or other documentation available for the file.

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.

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