

BEFORE THE
POSTAL RATE COMMISSION

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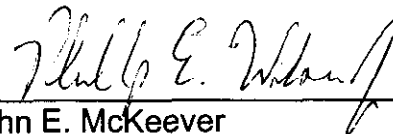
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS RAYMOND
(UPS/USPS-T13-7 through 9)
(February 24, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Raymond: UPS/USPS-T13-7 through 9.

Respectfully submitted,



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

UPS/USPS-T13-7. There are twelve records in USPS-LR-I-163 (the Engineered Standards Database) in which the Activity is "Parcel" and the STS Type is "Driving Time."

- (a) Explain why parcel activity is combined with driving time in each of these twelve records.
- (b) Do any of these twelve records represent driving time for a dedicated parcel run?
- (c) Do any of the twelve records represent driving time spent solely in order to deliver a parcel or parcels on a route that is not solely dedicated to making parcel deliveries?
- (d) Were these data used to apportion any part of driving time to specific products or services or groups of products or services? If so, to what products or services, and how much time was so apportioned? If not, why not?

UPS/USPS-T13-8. Refer to the forty-six records in USPS-LR-I-163 (the Engineered Standards Database) in which the Activity is "Parcel" and the Delivery Type is "Park & Loop."

- (a) The records of the observations made at 12:41:07 PM and 12:47:06 PM on December 5, 1996, have the same Unit Code (CY36) and Route Number (0480), but the Site Location is "Vehicle" for one and "On Route" for the other. Do these records provide an

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example of a run made on a park-and-loop route in order to deliver a parcel or parcels only? If so, has this six-minute time interval between the two records been allocated solely to parcels? If so, to what products or services, and how much time was so apportioned? If not, why not?

- (b) The records of the observations made at 10:07:21 AM and 10:19:27 AM on August 11, 1997, have the same Unit Code (CY64), Route Number (1401), and Site Location ("Point of Deliver"). Does the twelve-minute interval between the two records provide an example of a run made on a park-and-loop route in order to deliver a parcel or parcels only? Has this twelve-minute interval between the two records been allocated solely to parcels? If so, to what products or services, and how much time was so apportioned? If not, why not?

UPS/USPS-T13-9. Refer to page 28 of your testimony, where you state that "Level 11.4 'Js' identified delivery that were associated activities on route and were *typically* paired with Level 11.4.1 'Hs'" (emphasis added). Refer also to page 29 of your testimony, where you state that "Level 11.4 'Fs' *typically* identified deliveries that required customer interaction on route and were *typically* paired with Level 11.4.1 'Gs'" (emphasis added). There are only four records in USPS-LR-I-163 (the Engineered Standards Database) in which the level 11.4 Activity Code is "Parcels,"

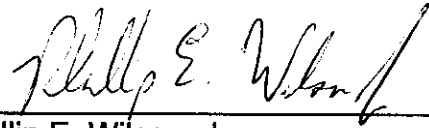
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Code J04; the level 11.4.1 Activity Detail Code is either E03 or H00. There are 650 records in the Engineered Standards Database that contain "Parcel," Code F02, as the activity. The majority of the level 11.4.1 Activity Detail Codes are either "Ks" or "Hs."

- (a) Provide more detail as to the difference between Activity Code J04, "Parcels," and Activity Code F02, "Parcel."
- (b) Provide examples of the differences between Activity Codes J04 and F02.
- (c) Explain why, in these records, most of the Activity Code F02 records are paired with Activity Detail Codes "Ks" or "Hs" and not with Activity Detail Code "Gs."
- (d) Provide documentation of specific instructions given to data collectors as to how they were to distinguish between Activity Codes J04 and F02. If explicit training materials do not exist, explain in detail what the data collectors were told in order to distinguish between Activity Codes J04 and F02.

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 24, 2000
Philadelphia, Pa.