

BEFORE THE
POSTAL RATE COMMISSION

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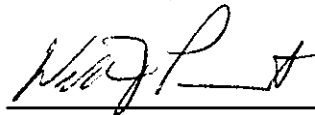
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS HUNTER
(UPS/USPS-T5-18 through 26)
(February 25, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to United States Postal Service witness Hunter: UPS/USPS-T5-18 through 26.

Respectfully submitted,



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

UPS/USPS-T5-18. Library reference USPS-LR-I-25, file LR-I-25.DOC at

1.General, the second paragraph, states that BRPW estimates of RPW totals are constructed from financial revenue accounts information and mailer-provided postage statement data.

(a) Are all mailer-provided postage statements hand-typed into the PERMIT System? If not, what proportion is hand-entered?

(b) What proportion of Parcel Post statements are hand-entered?

(c) Identify what data on the mailer-provided postage statements are entered into the PERMIT System and ultimately used in the BRPW system (i) for Parcel Post, and (ii) separately, for all other mail categories.

(d) Identify what data on the mailer-provided postage statements are not entered into the PERMIT System and therefore not used in the BRPW system (i) for Parcel Post, and (ii) separately, for all other categories, and indicate why such data is not entered into the PERMIT System.

(e) Are postage, revenue, and weight information for each mail piece entered into the PERMIT System for every piece that is covered by a mailer-provided postage statement? If not, why not?

(f) Are postage, revenue, and weight information for each Parcel Post piece all entered into the PERMIT System for every piece that is covered by a mailer-provided postage statement? If not, why not?

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UPS/USPS-T5-19. (a) What verification checks are performed to be sure that postage statement information is correctly entered into the PERMIT System and, ultimately, into the BRPW system?

(b) What verification checks are performed to be sure that postage statement information for Parcel Post mailings are correctly entered into the PERMIT System and, ultimately, into the BRPW system?

(c) If the verification processes described in the responses to (a) or (b), above, are done through sampling, explain in detail how the process is performed, including a description of how the sample is selected. Explain the process separately for Parcel Post and for all other mail categories, to the extent there are any differences.

(d) If input errors are discovered in the verification process, are they corrected? How? Explain in detail. If they are not corrected, explain why.

(e) If input errors are discovered in the verification process in the case of Parcel Post, are they corrected? How? Explain in detail. If they are not corrected, explain why.

UPS/USPS-T5-20. (a) Explain in detail the process by which the Postal Service verifies that the mail actually received from a mailer matches the information about it indicated on the postage statement provided by the mailer. Is each piece counted and examined in the verification process? If not, why not?

(b) Is each Parcel Post piece counted and examined in the verification process in the case of a Parcel Post mailing? If not, why not?

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(c) If the verification processes referred to in the responses to (a) or (b), above, are done on a sampling basis, explain in detail how the process is performed, including a description of how the sample is selected.

(d) If a sampling process is used for verification, what percent of mail is checked? What percent of Parcel Post mail is checked?

(e) If a sampling process is used for verification, provide detailed information by mail class and subclass on the proportion of errors discovered, as well as on the actual number of errors discovered.

(f) Explain how errors discovered through sampling or through any other means of verification are corrected. If they are not corrected, why not?

(g) Explain how errors in the case of Parcel Post discovered through sampling or any other means of verification are corrected. If they are not corrected, why not?

UPS/USPS-T5-21. Explain in detail the process by which the results generated from the BRPW system are verified for accuracy against actual postage mailing statements and the PERMIT system data. If such a verification is not done, provide a detailed explanation of why it is not done.

UPS/USPS-T5-22. Provide copies of "[t]he Postal Service's studies" and all supporting documents and analyses referred to on the last line of page 93 and the first line of page 94 of the Data Quality Study Summary Report dated April 16, 1999, prepared by LINX. Provide all analyses available in electronic format in their fully developed form (formulas intact).

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UPS/USPS-T5-23. Library reference USPS-LR-I-25, file LR-I-25.DOC, at 2.System Methodology, the second paragraph, states, “[t]he estimates of RPW totals are then obtained by combining these data records with office and stratum level blow-up factors, and then adjusting the combined strata estimate to postage revenue account totals.”

(a) Provide all files and documents used to develop the Office and Stratum level blow-up factors.

(b) Provide all files and documents used to develop the adjustments that are made to adjust the combined strata estimate to postage revenue account totals.

(c) Provide all analyses and supporting spreadsheets available in electronic format and in their fully developed form (formulas intact).

UPS/USPS-T5-24. Library reference USPS-LR-I-25, file LR-I-25.DOC at 2.System Methodology, the first paragraph, states, “[t]he VIP Code scheme maps the revenue, volume and weight data for each reporting office to the individual rate categories as defined by the line items on postage statements for the applicable rate period. . . .”

(a) Provide all files and documents used to develop the Volume Information Profiles (VIP).

(b) Provide all analyses and supporting spreadsheets available in electronic format and in their fully developed form (formulas intact).

UPS/USPS-T5-25. Library reference USPS-LR-25, file LR-I-25.DOC at 3.Jobstream Description, the first paragraph, states, “[t]he third job inflates the second

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job's output data using office and stratum based blowup and national trial balance factors."

(a) Provide all files and documents used to develop the national trial balance factors.

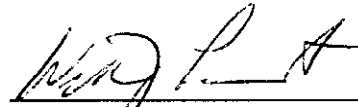
(b) Provide all analyses and supporting spreadsheets available in electronic format and in their fully developed form (formulas intact).

UPS/USPS-T5-26. (a) Provide the number of automated PERMIT offices, the number of non-automated PERMIT offices, and the proportions of volume by First Class Mail, permit imprint Priority Mail, Periodicals, Standard (A), permit imprint Parcel Post, permit imprint Bound Printed Matter, non-permit imprint Priority Mail, non-permit imprint Parcel Post, and non-permit Bound Printed Matter for each of those categories of offices.

(b) Provide separately for (i) automated PERMIT offices, (ii) non-automated PERMIT offices, (iii) sampled non-PERMIT offices, and (iv) unsampled non-PERMIT offices, the proportions of volume for non-permit imprint Priority Mail, non-permit imprint Parcel Post, and non-permit imprint Bound Printed Matter in each of those categories of offices.

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.



William J. Pinamont
Attorney for United Parcel Service

Dated: February 25, 2000
Philadelphia, Pa.

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