POSTAL RATE AND FEE CHANGES, 2000

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INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS XIE (UPS/USPS-T1-18 through 30) (February 28, 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-T1-18 through 30.

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.

UPS/USPS-T1-18. The TRACS Commercial Air Subsystem (USPS-LR-I-49) and the TRACS Network Air Subsystem (USPS-LR-I-51) computer programs make use of a number of computer data files from the Air Contract Support System (ACSS). In the documentation of the Subsystem, these files are named

LAUSTNT.PS476TCR.FYWK98ww, where ww represents two digits that indicate the week within the year. USPS-LR-I-49 and I-51, at 15. Provide a list of all of the variables contained in the entire set of files, beyond those listed in Appendix I of USPS-LR-I-49, and a description of each, for 1998 and any other time periods currently available.

UPS/USPS-T1-19. The TRACS Commercial Air Subsystem (USPS-LR-I-49) computer programs make use of a computer data file from the Official Airline Guide (OAG). In the documentation of the Subsystem, this file is named LAUSTNT.VS570D02. USPS-LR-I-49, at 18. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-49, and a description of each, for 1998 and any other time periods currently available.

UPS/USPS-T-1-20. Provide the following information for the TRACS Commercial Air Subsystem (USPS-LR-I-49):

(a) List the reasons why a trip inspection would not take place, or a scheduled inspection would be changed to another trip.

(b) For each reason, list the number of trips affected, by quarter.

UPS/USPS-T1-21. Provide the following information for the TRACS Commercial Air Subsystem (USPS-LR-I-49):

(a) List reasons why a trip, or record within a trip, would be dropped from the sample during the Edit process.

(b) For each reason, list the number of trips, and records within trips, dropped from the sample, by quarter.

UPS/USPS-T1-22. The TRACS Network Air Subsystem (USPS-LR-I-51) computer programs make use of a computer data file from the National Air and Surface System (NASS). In the documentation of the Subsystem, this file is named LAXSTN.PS272D14(0). USPS-LR-I-51, at 14. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-51, and a description of each, for 1998 and any other time periods currently available.

UPS/USPS-T1-23. Provide the following information for the TRACS Network Air Subsystem (USPS-LR-I-51):

(a) List the reasons why a trip inspection would not take place, or a scheduled inspection would be changed to another trip.

(b) For each reason, list the number of trips affected, by quarter.

UPS/USPS-T1-24. Provide the following information for the TRACS Network Air Subsystem (USPS-LR-I-51):

(a) List reasons why a trip, or record within a trip, would be dropped from the sample during the Edit process.

(b) For each reason, list the number of trips, and records within trips, dropped from the sample, by quarter.

UPS/USPS-T1-25. The TRACS Highway Subsystem (USPS-LR-I-52) computer programs make use of a computer data file from the National Air and Surface System (NASS). In the documentation of the Subsystem, this file is named LAXSTN.PS272D13(0). USPS-LR-I-52, at 26. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-52, and a description of each, for 1998 and any other time periods currently available.

UPS/USPS-T-26. The TRACS Highway Subsystem (USPS-LR-I-52) computer programs make use of computer data files from the Highway Payment Master File. In the documentation of the Subsystem, this file is named ACR.ST008T11. USPS-LR-I-52, at 26. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-52, and a description of each, for 1998 and any other time periods currently available.

UPS/USPS-T1-27. The TRACS Highway Subsystem (USPS-LR-I-52) computer programs make use of two computer data files from the Highway Contract Support System (HCSS). In the documentation of the Subsystem, these files are named userid.ACR95.COSTCFM.FLAT.TEXT and userid.ACR.INTRASCF.BOXDEL.TEXT. USPS-LR-I-52, at 27. Provide a list of all of the variables contained in the entire set of files, beyond those listed in Appendix I of USPS-LR-I-52, and a description of each, for 1998 and any other time periods currently available.

UPS/USPS-T1-28. In the TRACS Highway Subsystem (USPS-LR-I-52), the documentation indicates that the Pallet dataset within the Final Analysis File (Z-File) is to contain a variable called TOTWT, the gross weight of the sampled item. USPS-LR-I-52, at 31. This variable does not appear in the file.

(a) Explain why the variable is not present in the file.

(b) Provide revised versions of the Z-file that contain this variable.

UPS/USPS-T1-29. Provide the following information for the TRACS Highway Subsystem (USPS-LR-I-52):

(a) List the reasons why a trip inspection would not take place, or a scheduled inspection would be changed to another trip.

(b) For each reason, list the number of trips affected, by quarter.

UPS/USPS-T1-30. Provide the following information for the TRACS Highway Subsystem (USPS-LR-I-52):

(a) List reasons why a trip, or record within a trip, would be dropped from the sample during the Edit process.

(b) For each reason, list the number of trips, and records within trips, dropped from the sample, by quarter.

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.

2. Wilson /

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

Dated: February 28, 2000 Philadelphia, Pa.