

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS XIE TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T1-2-16)
(February 29, 2000)

The United States Postal Service hereby provides the responses of witness Xie to the following interrogatories of United Parcel Service: UPS/USPS-T1-2-16, filed on February 15, 2000. A partial objection to UPS/USPS-T1-2-3, 5-6, 8-9, 11-12 and 14-15 was filed on February 25, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.

Chief Counsel, Ratemaking

K N Hollies

Kenneth N. Hollies

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Three sets of programs are provided in USPS-LR-I-49: sample selection ('Design'), data editing ('Edit'), and expansion ('Expand'). The input data files necessary to execute the expansion programs for all quarters are contained in USPS-LR-I-49. They are all 'xport' SAS files. The input data files necessary to execute all the data editing programs will be provided in USPS-LR-I-214 (by March 7, if protective conditions are set). The filenames with extensions 'xpt' are 'xport' SAS files and they can be read the same way as the 'xport' SAS files provided in USPS-LR-I-49. The input data files to the sample selection programs are not available, because they were not retained. However, hard copies of the SAS log files are being provided in USPS-LR-I-207.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. The output data files for the expansion programs are the distribution keys that can be found in the SAS log files. These log files have been provided in USPS-LR-I-49, for all quarters. The outputs from the data editing programs are the inputs to the expansion programs (ZFILES), which have been provided in the same library reference. The SAS log files generated by the data editing programs will be provided in USPS-LR-I-214 (by March 7, if protective conditions are set). Outputs from the sample selection programs are the test schedules that appear in the SAS logs contained in USPS-LR-I-207.

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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.

RESPONSE.

Confirmed for the expansion programs. Not confirmed for the sample selection programs and data edit programs. See USPS-LR-I-208 for the source code files for quarters other than those provided in USPS-LR-I-49.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Three sets of programs are provided in USPS-LR-I-50: sample selection ('Design'), data editing ('Edits'), and expansion ('Expand'). Input data files necessary to execute the expansion programs for all quarters are contained in USPS-LR-I-50. The input data files necessary to execute all the data editing programs will be provided in USPS-LR-I-209 (once protective conditions have been set). The input data files to the sample selection programs are not available because they have not been retained. Hard copies of SAS log files are being provided in USPS-LR-I-207.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. The output data files for the expansion programs are the distribution keys that can be found in the SAS log files. The log files have been provided in USPS-LR-I-50, for all quarters. Outputs from the data editing programs are the inputs to the expansion programs. All inputs to the expansion programs have been provided in the same library reference. The SAS log files generated by the data editing programs will be provided in USPS-LR-I-209 (once protective conditions are set). Outputs from the sample selection programs are the test schedules that are shown in the SAS logs contained in USPS-LR-I-207.

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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.

RESPONSE.

Not confirmed. Source code files for the expansion programs were provided for each quarter in USPS-LR-I-50. For the sample selection and data editing programs, the source code files for quarters other than those provided in USPS-LR-I-50 are being provided in USPS-LR-I-208.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Three sets of programs are provided in USPS-LR-I-51: sample selection ('Design'), data editing ('Edit'), and expansion ('Expand'). Input data files necessary to execute the expansion programs for all quarters are provided in USPS-LR-I-51. They are all 'xport' SAS files. The input data files necessary to execute all the data editing programs will be provided in USPS-LR-I-211 (once protective conditions are set). Filenames with the extension 'xpt' are 'xport' SAS files, which can be read the same way as the 'xport' SAS files provided in USPS-LR-I-51. Electronic input data files for the sample selection programs are not available, because they were not retained. Hard copies of SAS log files are being provided in USPS-LR-I-207.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Output data files for the expansion programs are the distribution keys that can be found in the SAS log files. These log files have been provided in USPS-LR-I-51, for all quarters. Outputs from data editing programs are the inputs to the expansion programs (ZFILES), which have been provided in the same library reference. The SAS log files generated by the data editing programs will be provided in USPS-LR-I-211 (once protective conditions are set). Outputs from sample selection programs are the test schedules that will be shown in the SAS logs contained in USPS-LR-I-207.

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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.

RESPONSE.

Confirmed for the expansion programs. Not confirmed for the sample selection ('Design') programs and data edit programs. USPS-LR-I-208 contains the source code files for quarters other than those provided in USPS-LR-I-51.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Three sets of programs are provided in USPS-LR-I-52: sample selection, data editing, and expansion. Input data files necessary to execute the expansion programs for all quarters are provided in USPS-LR-I-52. All are 'xport' SAS files. Input data files necessary to execute all the data editing programs will be provided in USPS-LR-I-212 (by March 7, if protective conditions are set). Filenames with the extension 'xpt' are 'xport' SAS file which can be read the same way as the 'xport' SAS files provided in USPS-LR-I-52. Input data files to the sample selection programs have not been retained and are unavailable. Hard copies of the SAS log files are being provided in USPS-LR-I-207.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Output data files for the expansion programs are the distribution keys found in the SAS log files. These log files have been provided in USPS-LR-I-52, for all quarters. Outputs from the data editing programs are the inputs to the expansion programs (ZFILES), which have been provided in the same library reference. The SAS log files generated by the data editing programs will be provided in USPS-LR-I-212 (by March 7, if protective conditions are set). Outputs from the sample selection programs are the test schedules shown in SAS logs which are being provided in USPS-LR-I-207.

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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.

RESPONSE.

Confirmed for the expansion programs. Not confirmed for the sample selection and data edit programs. USPS-LR-I-208 provides the source code files for quarters other than those provided in USPS-LR-I-52.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Three sets of programs are provided in USPS-LR-I-53: sample selection ('Design'), data editing ('Edits'), and expansion ('Expand'). Input data files necessary to execute the expansion programs for all quarters are contained in USPS-LR-I-53. The input data files necessary to execute all the data editing programs will be provided in USPS-LR-I-210 (once protective conditions are set). Input data files to the sample selection programs are not unavailable because they have not been retained. Hard copies of the SAS log files are being provided in USPS-LR-I-207.

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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.

RESPONSE.

A partial objection to this interrogatory has been filed. Output data files for the expansion programs are the distribution keys that can be found in the SAS log files. The log files have been provided in USPS-LR-I-53, for all quarters. Outputs from the data editing programs are the inputs to the expansion programs. All inputs to the expansion programs have been provided in the same library reference. The SAS log files generated by the data editing programs will be provided in USPS-LR-I-210 (once protective conditions are set). Outputs from the sample selection programs are the test schedules are in the SAS logs which are being provided in USPS-LR-I-207.

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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.

RESPONSE.

Not confirmed. Source code files for the expansion programs were provided for each quarter in USPS-LR-I-53. Sample selection and data editing programs are being provided in USPS-LR-I-208 for the source code files for quarters other than those provided in USPS-LR-I-53.

DECLARATION

I, Jennifer J. Xie, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.



Jennifer J. Xie

Date: 2/29/00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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