

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE
(UPS/USPS-T1-17)

The United States Postal Service hereby provides its response to the following interrogatory of United Parcel Service: UPS/USPS-T1-17, filed on February 15, 2000, and redirected from witness Xie.

The 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



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February 29, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE, USPS-T-1)**

UPS/USPS-T1 -17. Refer to page 13 of your testimony, where you describe the structure of the route network for the Eagle and Western dedicated networks. Specifically, you state that "Unlike commercial airline flights, network flights are dedicated fully to transporting mail between the hub and one or more cities in the network. The hub for the Eagle Network is Indianapolis, Indiana; for the Western Network, it is Oakland, California."

(a) How long have Indianapolis, Indiana, and Oakland, California, been the hubs for the Eagle and Western networks, respectively?

b) Is it the case that Indianapolis, Indiana, and Oakland, California, have been the only hubs for the Eagle and Western networks, respectively, during the period from 1996 through the present? If not, identify any other hubs in operation during this period and specify the time periods during which they were in operation.

(c) List the destination cities served at present by the Eagle network and, separately, by the Western network. Is it the case that all destinations are served only by aircraft traveling directly between hub and a single destination point? If not, identify any cities served by the Eagle network and/or the Western network that do not have service connecting them directly (i.e., non-stop) to the hubs. Describe how each is connected to the network.

(d) Describe by network any changes in the destinations served by each of these dedicated networks during the period from 1996 to present. In particular, list any destinations that have been added or removed from each network in this period, or that have seen a substantive change in the nature of their connection with the hub. Also, list the dates when such changes were made.

(e) For each destination served by these dedicated air networks, list for each network the number of flights per day to that destination and the approximate times of those flights. Have there been any changes in the number of flights per day to any destination served by either of these networks during the period from 1996 to the present? For every destination served by either of the two networks, list all changes in the number of flights serving the destination in this period and the dates on which those changes were made.

(f) List the aircraft types that are used for the operation of the Eagle network and, separately, for the Western network. For each destination, list the aircraft type or types that serve that destination. Identify by network any changes in either the number of aircraft or in the types of aircraft used by these networks during the period from 1996 to the present, and identify the time periods that different aircraft were in operation.

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INTERROGATORY OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE, USPS-T-1)

RESPONSE

Throughout this response, the Postal Service assumes that references to Eagle and WNET refer to overnight network operations. Additional cities are linked to overnight network hubs and outstation airports using highway transportation and air taxis.

(a and b) Indianapolis has been the hub for Eagle operations since August 1989. It remains the hub to this day. Oakland was the WNET hub from its inception in May 1992 until August 1999 when the hub was moved to Mather Airport outside Sacramento.

(c) Los Angeles, Newark, and New York all have direct connections to the EAGLE hub using a single aircraft for each city. The remaining cities are organized into city pairs that share aircraft. These city pairs are: Jacksonville and Tampa, Miami and San Juan, Hartford and Boston, Baltimore and Washington, Dallas and San Antonio, Denver and San Francisco, New Orleans and Houston, Atlanta and Orlando, Minneapolis and Seattle, Richmond and Norfolk, Charlotte and Greensboro, Cleveland and Buffalo, Pittsburgh and Philadelphia, Saint Louis and Kansas City, Chicago and Milwaukee, Phoenix and San Diego, Detroit and Grand Rapids, and Salt Lake City and Portland.

The WNET in Mather uses dedicated aircraft to provide service to Seattle, Oakland, and Las Vegas. Other WNET service is provided with a single aircraft to each of the following city pairs: Portland and Spokane, Los Angeles and San

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE, USPS-T-1)

Diego, Phoenix and Albuquerque, Billings and Denver, and Salt Lake City and Boise.

Since November 9, 1999, a flight has connected the WNET and Eagle hubs. On its westbound flight, the aircraft stops in Denver.

(d) The Eagle network added Salt Lake City and Portland (OR) in October 27, 1998.

The WNET has had three incarnations since FY 1996. From the beginning of FY 1996 to May 1997, the WNET was based in Oakland and provided service to five city pairs: Seattle and Portland, Albuquerque and Phoenix, San Diego and Los Angeles, Las Vegas and Reno, Denver and Salt Lake City.

From May 27, 1997 to August 27, 1999, the WNET provided service to the following city pairs: Spokane and Seattle, San Diego and Los Angeles, and Billings and Denver, Albuquerque and Phoenix, and Boise and Salt Lake City. Dedicated aircraft were provided to the unpaired cities of Portland, Reno, and Las Vegas.

(e) Each city on the network is served by a single round trip flight. The only exception has been the use of two round trips for Portland on the WNET from May 1997 to August 1999. The attached schedules provide flight times for each network during the summer months.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE, USPS-T-1)

(f) EAGLE planes are all Boeing 727-100s except for four 727-200s serving New York, Boston and Hartford, San Juan and Miami, and Los Angeles. No changes have been made to the Eagle aircraft since 1996.

WNET uses 727-200s for the following city pairs: Portland and Spokane, Los Angeles and San Diego, Phoenix and Albuquerque, Billings and Denver, and Salt Lake City and Boise. Seattle and Oakland are unpaired and are each served using a 727-200. Service is provided to Las Vegas using a Metro III aircraft.

The flight connecting the two hubs is served with a 727-200.

For the period May 27, 1997 through August 27, 1999, the WNET used DC9-30 aircraft to provide service to the following city pairs: Spokane and Seattle, San Diego and Los Angeles, and Billings and Denver. The two city pairs Albuquerque and Phoenix and Boise and Salt Lake City were served using DC9-15s. Dedicated Metro III aircraft were provided to the unpaired cities of Reno and Las Vegas. Portland initially used a Convair aircraft for approximately 2 weeks. Since this aircraft failed to meet the scheduled daily requirements, the contractor decided to switch to a DC9-30 aircraft for approximately 7 months. The aircraft was then switched to a pair of Beechcraft 1900.

From FY 1996 to May 26, 1997, one DC9-30 was used to provide service to each of the following city pairs: Seattle and Portland, San Diego and Los

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE, USPS-T-1)

Angeles, and Denver and Salt Lake City. A DC9-15 was used for Albuquerque
and Phoenix. A Metro III was used for Las Vegas and Reno.

Attachment to Response of the United States Postal Service to United Parcel Service Interrogatory T1-17(e)
 Redirected from Witness Xie

EAGLE NETWORK SCHEDULE							
ORIGIN	DESTINATION	STD	STA	ORIGIN	DESTINATION	STD	STA
TPA	JAX	2300	2346	JAX	TPA	0547	0637
JAX	IND	0006	0058	IND	JAX	0240	0527
SJU	MIA	2100	2332	MIA	SJU	0629	0853
MIA	IND	2357	0130	IND	MIA	0242	0604
BOS	BDL	2230	2320	BDL	BOS	0555	0630
BDL	IND	2345	0056	IND	BDL	0248	0530
JFK	IND	2314	0019	IND	JFK	0252	0538
IAD	BWI	2245	2327	BWI	IAD	0558	0642
BWI	IND	2357	0038	IND	BWI	0258	0528
SAT	DFW	2209	2303	DFW	SAT	0536	0635
DFW	IND	2328	0118	IND	DFW	0300	0511
SFO	DEN	1911	2228	DEN	SFO	0528	0620
DEN	IND	2248	0205	IND	DEN	0304	0430
IAH	MSY	2233	2331	MSY	IAH	0551	0629
MSY	IND	0001	0150	IND	MSY	0304	0456
MCO	ATL	2336	0050	ATL	MCO	0511	0700
ATL	IND	0120	0140	IND	ATL	0306	0521
SEA	MSP	1905	0008	MSP	SEA	0309	0634
MSP	IND	0033	0155	IND	MSP	0559	0446
EWR	IND	2319	0018	IND	EWR	0312	0553
ORF	RIC	2236	2313	RIC	ORF	0528	0647
RIC	IND	2343	0026	IND	RIC	0315	0543
GSO	CLT	0009	0043	CLT	GSO	0536	0631
CLT	IND	0113	0136	IND	CLT	0318	0529
BUF	CLE	2255	2351	CLE	BUF	0440	0613
CLE	IND	0011	0015	IND	CLE	0321	0508
PHL	PIT	2300	0006	PIT	PHL	0323	0627
PIT	IND	0026	0039	IND	PIT	0447	0516
MCI	STL	2235	2325	STL	MCI	0325	0539
STL	IND	2345	0035	IND	STL	0628	0420
LAX	IND	2029	0210	IND	LAX	0330	0541
MKE	ORD	2218	2306	ORD	MKE	0541	0531
ORD	MKE	2336	0026	MKE	ORD	0330	0417
SAN	PHX	1935	2139	PHX	SAN	0447	0636
PHX	IND	2159	0204	IND	PHX	0325	0608
GRR	DTW	2340	0025	DTW	GRR	0541	0630
DTW	IND	0045	0044	IND	DTW	0330	0521
PDX	SLC	1835	2118	SLC	PDX	0623	0707
SLC	IND	2148	0200	IND	SLC	0325	0553

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WNET SCHEDULE - CURRENT 1999							
ORIGIN	DESTINATION	STD	STA	ORIGIN	DESTINATION	STD	STA
SEA	MHR	2240	0030	MHR	SEA	0200	0345
GEG	PDX	2115	2225	PDX	GEG	0030	0435
PDX	MHR	2255	0015	MHR	PDX	0150	0310
OAK	MHR	2350	0030	MHR	OAK	0120	0200
ABQ	PHX	2150	2200	PHX	ABQ	0355	0550
PHX	MHR	2230	0010	MHR	PHX	0135	0335
SAN	LAX	2230	2310	LAX	SAN	0310	0400
LAX	MHR	2340	0050	MHR	LAX	0130	0240
BIL	DEN	2030	2150	MHR	DEN	0125	0435
DEN	MHR	2320	0035	SLC	BOI	0445	0545
BOI	SLC	2240	2350	MHR	SLC	0145	0415
SLC	MHR	0010	0100	MHR	LAS	0150	0405
LAS	MHR	2220	0035	DEN	MHR	2130	2230
MHR	IND	0130	0815	IND	DEN	2045	2100

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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