

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 BOZZO TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T15-2-8)

The United States Postal Service hereby provides the responses of witness Bozzo to the following interrogatories of United Parcel Service: UPS/USPS-T15-2-8, filed on February 15, 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



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February 29, 2000

UPS/USPS-T15-2. For the Installation Master File referred to at pages 89 and 94 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-2 Response.

- a. A file format description will be provided in LR-I-201. See also the response to part (e) of this interrogatory.
- b. The time period covered by the IMF data to which I have access is FY1986-present. The data frequency is accounting period. From FY1986-FY1991, IMF data for some accounting periods are not readily available. It is also my understanding that some earlier data may exist, possibly in a different format.
- c. Each record in the IMF corresponds to a Finance number.
- d. My understanding is that the IMF encompasses all active Finance numbers.
- e. My understanding is that there is no manual or other printed documentation for the IMF per se, but that descriptions of certain IMF fields may be found in Handbook F-8, which previously has been filed as part of LR-I-183.

Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service

UPS/USPS-T15-3. For the Management Operating Data System initially referred to at page 1 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-3 Response.

- a. A FOCUS data dictionary report for the MODS file will be provided in LR-I-201.
- b. MODS data from FY1991 to the present are currently available on the Postal Service's Corporate Data Base. The data frequency is accounting period. Some earlier data also exist, including the data from Dr. Bradley's MODS data set (see Docket No. R97-1, USPS-LR-H-148).
- c. Since the MODS file is a FOCUS database, the record levels are user-defined. It is my understanding that the finest level of "units of observation" in the MODS file is the combination of Finance number and 3-digit MODS operation number.
- d. The "universe of installations" is the set of Finance numbers reporting data to MODS. These include most "Function 1" mail processing facilities (except BMCs) and some stations, branches, and associate offices.
- e. See Docket No. R97-1, LR-H-147.

Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service

UPS/USPS-T15-4. For the Address Information System referred to at pages 89-90 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-4 Response.

- a. A file format description will be provided in LR-I-201 for the AIS Delivery Statistics File, the specific Postal Service address information system product referenced.
- b. The time period covered by the Delivery Statistics File data to which I have access is FY1988-present. See USPS-T-15 at page 90, lines 1-2 and footnote 48 for the data frequency. I do not have ready access to the Delivery Statistics File data for some accounting periods prior to FY1993. It is also my understanding that earlier data may exist, possibly in a different format.
- c. The "unit of observation" in the AIS Delivery Statistics File is the delivery route, post office box section, or set of highway contract deliveries.
- d. My understanding is that the AIS Delivery Statistics File encompasses all Finance numbers with city, rural, post office box, or highway contract deliveries.
- e. A delivery statistics technical guide and AIS product and services guide will be provided in LR-I-201.

Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service

UPS/USPS-T15-5. For the Address List Management System referred to at pages 89 and 90 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-5 Response.

- a. A file format description will be provided in LR-I-201.
- b. The time period covered by the ALMS data to which I have ready access is March 1993-present. The ALMS data frequency is monthly; see LR-I-107 at page 18. It is my understanding that earlier data may exist, possibly in a different format.
- c. The "unit of observation" in ALMS is the post office, station, or branch. It is my understanding that ALMS also includes records for contract stations, unique ZIP Codes, and the like.
- d. My understanding is that ALMS encompasses all post offices, stations, branches, and other units listed in the response to part (c) of this interrogatory.
- e. An ALMS guide will be provided in LR-I-201.

Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service

UPS/USPS-T15-6. For the National Workhour Reporting System referred to at pages 89 and 91-92 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-6 Response.

- a. A file format description will be provided in LR-I-201.
- b. The time period covered by the NWRS data to which I have access is FY 1987-present. The data frequency is accounting period. I do not have ready access to the NWRS data for some accounting periods prior to FY 1992. It is also my understanding that earlier data may exist, possibly in a different format.
- c. The "units of observation" in NWRS are the Finance number and Labor Distribution Code (LDC). The LDC partitions the workhours and related salary and benefits expenses into broad operational categories. See Docket No. R97-1, LR-H-146 at pages I-32 to I-38 for descriptions of the LDCs.
- d. My understanding is that NWRS encompasses all Finance numbers reporting labor expenses.
- e. I am not aware of any NWRS manual. However, if responsive material is located, it will be provided in LR-I-201.

Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service

UPS/USPS-T15-7. For the Personal Property Asset Master referred to at pages 89 and 93-94 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-7 Response.

- a. A file format description will be provided in LR-I-201.
- b. The time period covered by the PPAM data to which I have ready access is FY 1985-present. The data frequency is annual prior to FY 1990 and accounting period since FY 1990.
- c. The "unit of observation" in PPAM is the piece of property.
- d. My understanding is that the PPAM encompasses all Finance numbers with Postal Service equipment.
- e. See Handbook F-43 ("Property Code Numbers"), a partial update to Handbook F-43, and Handbook F-26 ("Personal Property Accounting"), which will be provided in LR-I-201.

Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service

UPS/USPS-T15-8. For the Facility Master System referred to at pages 89 and 93 of your testimony:

- (a) List the full set of variables contained in the file, along with their definitions;
- (b) Indicate the time period covered by the file;
- (c) Describe the unit of observation, that is, the entity to which individual records in the file correspond;
- (d) Describe the universe of installations contained in the file; and
- (e) Provide any manuals or other documentation available for the file.

UPS/USPS-T15-8 Response.

Please note that the reference at page 93, line 6, of USPS-T-15 should read "Facility Management System" instead of "Facility Master System." The system's name appears correctly at page 89, lines 11-12, of USPS-T-15.

- a. A file format description will be provided in LR-I-201. See also the response to part (e) of this interrogatory.
- b. The time period covered by the FMS data to which I have ready access is FY 1983-present. The data frequency is quarterly from FY1992-present. Prior to FY1992, the FMS data frequency is annual.
- c. The "unit of observation" in FMS is the Postal Service facility, owned or rented. That is, each plant, post office, station, branch, or other type of Postal Service facility appears as a separate record in the file.
- d. My understanding is that FMS encompasses all real estate occupied by the Postal Service.

**Response of United States Postal Service Witness Bozzo
To Interrogatories of United Parcel Service**

- e. See Docket No. R94-1, USPS-LR-G-120, part c, for Handbook RE-3 ("Facilities Management System").

DECLARATION

I, A. Thomas Bozzo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A. Thomas Bozzo

Dated: 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.

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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