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

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–T1–18-30)
(March 13, 2000)

The United States Postal Service hereby provides the responses of witness Xie

to the following interrogatories of United Parcel Service: UPS/USPS–T1-18-30, filed on

February 28, 2000.

Several of these responses refer to library references that have been prepared

but not filed since they can only be made available under protective conditions that

have yet to attach. *See Partial Objection of United States Postal Service to*

Interrogatories UPS/USPS-T1-2-3, 5-6, 8-9, 11-12 and 14-15 (February 25, 2000).

Each such referenced library reference was also referred to in witness Xie's responses

to the previous UPS interrogatory set, UPS/USPS-T1-6-17, filed on February 29, 2000.
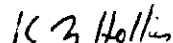
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

I have not looked into other variables contained in these files, beyond those listed in Appendix of USPS-LR-I-49. These are the only variables used in 1998 and previous years. They are exactly the same ones we provided in the last rate case (R97-1).

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

I have not looked into other variables contained in the file, beyond those listed in Appendix of USPS-LR-I-49. These are the only variables used in 1998 and previous years. They are exactly the same ones we provided in the last rate case (R97-1).

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T1-20. 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

RESPONSE.

(a)   There are two possible reasons a trip inspection may not take place. A trip inspection may be canceled if the test facility is closed at the time of the scheduled trip. On rare occasions, field staff are unable to perform the trip inspection within the quarter. There are two possible scenarios under which a trip inspection might be changed to another trip. If there is no mail for the scheduled flight, the scheduled trip may be replaced by the next flight on the same day, with preference given to the same airline and same first-leg destination. If a data collector is unable to record the mail before the flight is dispatched, the trip inspection may be rescheduled to the same flight in the following week(s).

(b)   I have not compiled the requested numbers. However, they can be derived using files contained in USPS-LR-I-214. The number of inspections canceled in quarter 'q' is the difference between the number of commercial air tests in the sample master file 'CommAir(LR214)\BY98\AIRBYq98\Z\CODE.txt' and the number of commercial air tests in the test master file 'CommAir(LR214)\BY98\AIRBYq98\Z\AIR1.txt'. For commercial air tests, the first non-numerical character in the TESTID is 'A', or 'B', or 'C'.

R2000-1

To determine the number of replacement trips sampled, count the number of commercial air sample records with REPLACE='T'. To determine the number of rescheduled sample trips, count the records with RESCHED='T' in the test master file. The input file layout for the TEST Header file, on page 22 of USPS-LR-I-49, indicates the locations of the variables TESTID, REPLACE and RESCHED.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

(a)   A Commercial Air test record(s) may be dropped from the sample during the edit process for either of the following reasons: (1) there is no matching record in the administrative file (the ACSS file) for the test flight; or (2) there is no matching record in the ACSS file for the particular ACT Tag group recorded for the sampled item on the test flight.

(b)   I have not compiled the requested numbers. However, they can be derived using files contained in USPS-LR-I-49, USPS-LR-I-208, and USPS-LR-I-214. To determine the number of trips affected, compare the original commercial air sample records and the final records in the Z-File, by running the edit programs in USPS-LR-I-49 and USPS-LR-I-208, following the order described in the Commercial Air Edit Flowchart found on page 27 of USPS-LR-I-49. The input files can be found in USPS-LR-I-214.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

I have not looked into other variables contained in this file, beyond those listed in Appendix of USPS-LR-I-51. These are the only variables used in 1998 and previous years. They are exactly the same ones we provided in the last rate case (R97-1).

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

(a)   There are two reasons a trip inspection might not take place. A trip inspection might be canceled if the network flight is not operating on the scheduled day. On rare occasions, field staff are unable to perform the trip inspection within the quarter. A scheduled inspection might be rescheduled to the same flight in the following week(s) if a data collector is unable to record the appropriate mail on the scheduled day.

(b)   I have not compiled the requested numbers. However, they can be obtained by using files contained in USPS-LR-I-211 and USPS-LR-I-214. The number of inspections canceled in quarter 'q' is the difference between the number of network air tests in the sample master file 'CommAir(LR214)\BY98\AIRBYq98\Z\CODE.txt' and the number of network air tests in the test master file NetAir(LR211)\BY98\EAGBYq98\Z\AIR1.txt'. For network air tests, the first non-numerical character in the TESTID is 'F'. To determine the number of trips rescheduled, count the number of network air sample records with RESCHED='T' in the test master file. The input file layout for the TEST Header file can be found on page 21 of USPS-LR-I-51.

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

(a)   A Network Air test record(s) may be dropped from the sample during the edit process for either of the following reasons: (1) there is no matching record in the ACSS file for the test flight; or (2) there is no matching record in the ACSS file for the particular ACT Tag group recorded for the sampled item on the test flight.

(b)   I have not compiled the requested numbers. However, they can be derived using files contained in USPS-LR-I-51, USPS-LR-I-208 and USPS-LR-I-211. To determine the number of trips affected, compare the original Network Air sample records and the final records in the Z-File, by running the edit programs in USPS-LR-I-51 and USPS-LR-I-208, following the order described in the Network Air Edit Flowchart found on page 26 of USPS-LR-I-51. The input files can be found in USPS-LR-I-211.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

There are two additional variables in this file that I subsequently used to

provide auxiliary information in the data editing process, beyond those listed in

Appendix of USPS-LR-I-52. The first one is a route indicator located at position

78. A value 'E' indicates an operating route (effective route) and a 'D' indicates a

discontinued route. The second variable is a 10 digit date variable, from position

80 to 89. It provides the date when the route became effective or discontinued.

I have not looked into other variables, beyond the two described above and

those listed in Appendix of USPS-LR-I-52. These are the only variables used in

1998. The variables listed in Appendix of USPS-LR-I-52 are the exactly same

ones we provided in the last rate case (R97-1).

R2000-1

UPS/USPS-T1-26. 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.ST008TII. 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.

RESPONSE.

I have not looked into other variables contained in this file, beyond those listed in Appendix of USPS-LR-I-52. These are the only variables used in 1998 and previous years. They are exactly the same ones we provided in the last rate case (R97-1).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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 tiles 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.

RESPONSE.

I have not looked into other variables contained in this file, beyond those

listed in Appendix of USPS-LR-I-52. These are the only variables used in 1998

and previous years. They are exactly the same ones we provided in the last rate

case (R97-1).

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

The gross weight of the sampled pallet is not used in the expansion process. Therefore, it was not retained in the Z-File. Recording the pallet weight is optional for the data collector, and is collected solely for data validation. To include this variable in the Z-File, one can re-run the data editing programs, following the order described in the Data Editing Flowchart on page 34 of USPS-LR-I-52. The variable names are 'P1WEIGHT' and 'P2WEIGHT' for the first and the second pallet, respectively. The source code is provided in USPS-LR-I-52 for quarter 4 and in USPS-LR-I-208 for quarters 1, 2, and 3. The input files are contained in USPS-LR-I-212.

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.

RESPONSE.

(a)   There are two reasons a trip inspection might not take place. A trip inspection might be canceled if the test facility is closed. On rare occasions, field staff are unable to perform the trip inspection within the quarter. There are two possible scenarios under which a trip inspection might be changed to another trip. A scheduled inspection might be changed to (replaced by) another trip that has the same contract type on the same day if the scheduled trip no longer exists; or it might be rescheduled to the same trip in the following week(s) if a data collector is unable to record the appropriate data.

(b)   I have not compiled the requested numbers. However, they can be derived using files contained in USPS-LR-I-212. The number of inspections not conducted during quarter 'q' is the difference between the number of records in the sample master file 'ALB.HQ210D01.FY98.PQq' and the number of records in the test master file 'TRACSSMN.HWY1.CODES.PQq98.TEXT'. To determine the number of replacement trips sampled, count the records with REPLACE='T' in the test master file. To determine the number of rescheduled trips sampled, count the records with RESCHED='T' in the same file.

R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

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.
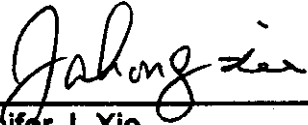
RESPONSE.

(a).   A trip, or record within a trip could be dropped for two reasons as follows:

(1) if there is no truck utilization data and no mail piece data for the entire test;

or, (2) the record contains inconsistent data.

(b)   I have not compiled the requested numbers. However, they can be

derived using the data editing program 'FORMS' provided in USPS-LR-I-208 and

USPS-LR-I-52. The input files required to execute the program are contained in

USPS-LR-I-212. Data sets 'ADDUTIL4' and 'DELETES' in 'FORMS' contain the

records deleted due to the first and second reason, respectively.

R2000-1

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.

Jahong Xie

Jennifer J. Xie

Date: ___March 13, 2000___

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.

K N Hollies

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–3083 Fax –5402
March 13, 2000