POSTAL RATE AND FEE CHANGES, 2000 :   DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS HUNTER
(UPS/USPS-T5-35 through 44)
(March 22, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby

serves the following interrogatories and requests for production of documents directed

to United States Postal Service witness Hunter: UPS/USPS-T5-35 through 44.

Respectfully submitted,

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INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS HUNTER

UPS/USPS-T5-35. Confirm that each record in the BRPW system data base you used represents all shipments for a given rate category for an entire AP at the same office. If you do not confirm, define what a record represents.

UPS/USPS-T5-36. For a plant-verified Parcel Post dropshipment, is the information captured in the BRPW system that which appears on PS Form 8125, or that which appears on the postage statement (PS Form 3605)?

UPS/USPS-T5-37. Refer to USPS-LR-I-230, page 1, which states, "For the FY 1998 period, a sixth panel comprised of automated offices, adjusted for residual non-automated office activity, is used for the permit imprint Parcel Post mail category."

(a) Why was a sixth panel used for the permit imprint Parcel Post mail category in FY1998?

(b) Was a sixth panel for the permit imprint Parcel Post mail category used in FY1999? Explain why, or why not.

(c) Define and describe the "residual non-automated office activity" which is referred to there.

UPS/USPS-T5-38. Do you intend to sponsor as part of your testimony library references USPS-LR-I-25, 26, 28, 30, 229, 230, and 44-48?

UPS/USPS-T5-39. Refer to the entries for Parcel Post in Tables 1 and 2 of the Attachment to UPS/USPS-T5-2 Response. Why are there no entries under the "Lower 95% Confidence Limit" and the "Upper 95% Confidence Limit" columns?

UPS/USPS-T5-40. Refer to your response to UPS/USPS-T5-7(a).

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INTERROGATORIES OF UNITED PARCEL SERVICE
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(a)   Why was there "no non-automated office sample" for permit imprint Parcel

Post?

(b)   Was there a non-automated office sample for Parcel Post other than

permit imprint Parcel Post? If so, provide the results of that sample.

(c)   Provide the "recently conducted survey of post offices" to which you refer.

UPS/USPS-T5-41. Refer to your answer to UPS/USPS-T5-8 and to PS Form

3605-R as in use in FY1998 (see Library Reference USPS-LR-I-26, Appendix A).

(a)   Confirm that PS Form 3605 as used in FY1998 did not request the mailer

to enter weight information by zone in Section B (Parcel Post) and in Section C

(Destination BMC).

(b)   Did the Postal Service obtain weight by zone in FY1998 some other way

in the case of a Parcel Post shipment reported on PS Form 3605, whether for DBMC

Parcel Post, inter-BMC Parcel Post, or intra-BMC Parcel Post? If so, indicate how that

information was obtained. If not, why not?

(c)   How is the "weight per piece" ratio referred to in your answer to

UPS/USPS-T5-8(b) obtained?

(d)   How are "the expected zone based rates" referred to in your answer

determined?

UPS/USPS-T5-42. Refer to your answer to UPS/USPS-T5-19(a)-(b), which

states that "All revenue, volume and weight fields are checked against the appropriate

minimum and maximum values."

(a)   Provide the "minimum and maximum values" to which you refer for every parameter that is checked for "appropriate minimum and maximum values" in the case of Parcel Post.

(b)   How were each of these "appropriate minimum and maximum values" determined for Parcel Post?

UPS/USPS-T5-43. Refer to your answer to UPS/USPS-T5-21, where you state that ". . . data validation studies are periodically undertaken to verify alignment of the data fields and source documents." Provide copies of all such studies that were undertaken during or with respect to FY1998.

UPS/USPS-T5-44. Confirm that each record in the BRPW system data base you used represents an individual shipment made by one mailer at one post office on one day. If you do not confirm, explain why.

UPS/USPS-T5-45. Is there some way of identifying whether a raw record was verified for accuracy against the postage statements pertaining to that record other than the verification checks that are performed in Jobs 1-3?

(a)   If so, explain in detail which variable(s) are used to identify such a record and identify the values that the record would have if it was verified.

(b)   If not, explain in detail why not.

UPS/USPS-T5-46. The output for Parcel Post showed 17 observations that had negative values for P and RP.

(a)   Explain why these records have negative values.

(b)   Are these the only Parcel Post records that have negative values?

(c)   If not, identify other Parcel Post records that have negative values and state why they were not included in Job 3 output.

UPS/USPS-T5-47. Confirm whether only eflagged observations are removed from the final estimates of R, P, and W. This question pertains to how the raw data entered in Job 1 is pared down in Jobs 1, 2, and 3 to provide final estimates of R, P, and W as final outputs of Job 3. If you do not confirm, explain in detail why you do not confirm and provide a complete list of other ways in which observations are removed from the final estimate.

UPS/USPS-T5-48. What are the F1 and F2 variables used for?

(a)   Provide definitions for each variable and provide a list of all possible values these variables could have for Parcel Post records.

(b)   If each variable could have more than one value, provide an explanation for why the value would change.

UPS/USPS-T5-49. Define the following variable labels and provide a list of all possible values these variables could have for Parcel Post records. If each variable could have more than one value, provide a detailed explanation for why the value would change.

(a)   Class

(b)   SYS

(c)   APK

(d)   Rdatek

(e)   Eflagk

(f)   Discount

(g)   AR

(h)   PQ

(i)   FY

(j)   Rdate

(k)   FINNO

(l)   VIP

(m)   VIP1

(n)   VIP2

(o)   VIP3

(p)   RPWCode

(q)   RP

(r)   RW

(s)   P

(t)   C

(u)   W

(v)   NRESP

(w)   Migrate

(x)   Eflag

(y)   Stratum

(z)   Blowup

(aa)   AIC

(bb)   Pdisc

UPS/USPS-T5-50. What happens to the non-numeric VIP records in Jobs 1-3?

(a)   Explain in detail what these records represent and how they are different from the non-numeric records.

(b)   Are they eliminated from the final estimates of R, P, and W? If not, explain in detail. If so, explain in detail why they are eliminated.

(c)   Are any Parcel Post records assigned non-numeric VIPs?

(d)   If so, are they included in the final estimates of R, P, and W? Explain why, or why not.

UPS/USPS-T5-51. Page 19 of Job 2 refers to single and multiple VIPs.

(a)   Explain in detail what this section of the code is used for in the program, and explain how Parcel Post observations are affected by it.

(b)   Explain why a record would have multiple VIP codes.

(c)   Can any Parcel Post records have Multiple VIPs? If so, do any have multiple VIPs?

(d)   When a record has multiple VIPs, which VIP is ultimately used to assign a record to the correct class? Explain in detail the logic for choosing one over the other.

UPS/USPS-T5-52. Page 27 of Job 2 refers to collecting 0 volume VIPs.

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(a)   Explain in detail what this section of the code is used for in the program, and explain how Parcel Post observations are affected by it.

(b)   Why would a record have zero volume?

(c)   What is the source of a zero volume VIP record?

(d)   Can any of the Parcel Post records be designated as zero volume VIPs? If so, are any so designated?

(e)   Are zero volume VIP records eliminated from the final estimate of R, P, and W output from Job 3?

(f)   Are zero volume VIP records part of the raw record inputs into Job 1, or is the volume zeroed out somewhere in Jobs 1-3? Explain in detail.

(g)   If these records are zeroed out in Jobs 1, 2, or 3, explain in detail why they are zeroed out.

(h)   If Parcel Post records are zeroed out in Jobs 1, 2, or 3, explain why these records are zeroed out.

(i)   If Parcel Post records are zeroed out in Jobs, 1, 2, or 3, and they are done so for different reasons than in the case of other mail classes, explain in detail why they are zeroed out for Parcel Post for reasons different than in the case of other mail classes.

UPS/USPS-T5-53. Page 5 of Job 3 has a statement that says the following: "Remove following after old rates obsolete." Explain this statement in detail.

(a)   What is this code used for in Job 3?

(b)   Why is it used?

(c)   How are Parcel Post records affected by this section of the code? Explain in detail.

UPS/USPS-T5-54. For Parcel Post records, if there is an empty or unexpected R, P, W, RPP, or RLB for a given observation, are the values imputed, or are the records eliminated from the final estimates? If neither, explain.

(a)   Confirm that imputation is only done in the code itself (i.e., none of the raw records input into Jobs 1, 2, or 3 are imputed before entering any job).

(b)   If you cannot confirm, indicate which Parcel Post records are imputed outside of the program (i.e., changes made to the raw record value(s), and then input into Jobs 1, 2, or 3 as opposed to having the code change the record).

(c)   Provide a complete list of all reasons why a record value would be imputed as opposed to removed from the final Job 3 output estimates.

(d)   How does this list differ between Parcel Post on the one hand and all other mail classes on the other hand?

UPS/USPS-T5-55. Confirm that Eflag=2100 is used in the BRPW system to identify unexpected R, P, or W values in each record. If you cannot confirm, explain in detail why you cannot confirm.

(a)   Define what "unexpected" means in the context that it is used in Jobs 1, 2, and 3.

(b)   Provide all documents and analyses used to develop the criteria for Eflag=2100 used in Jobs 1, 2, or 3.

(c)   Does Eflag=2100 process Parcel Post records any differently than any other mail class? If so, explain in detail.

UPS/USPS-T5-56. If a record does not meet the tolerance level for revenue per piece or weight per piece, is it removed from the final estimate? If not, explain all possible changes that are made to the record, so that it passes the tolerance level eflag test.

(a)   Provide copies of all analyses and supporting documentation used in developing these tolerance levels in hard copy and electronic format with original formulas intact.

(b)   Explain how the tolerance levels were derived.

(c)   What happens to Parcel Post records that are eflagged for tolerance violations?

(d)   Are they part of the population of final R, P, and W estimates output in Job 3? If not, explain in detail why not. If some records are and others are not, explain in detail how the two types are handled in the BRPW process.

(e)   If some records are and others are not, explain in detail what criteria is used for keeping one in the BRPW system versus not keeping another.

(f)   If some sort of formal, documented analysis is performed on each record to determine whether it stays in the process or not, provide copies of all such analyses,

along with supporting documentation for how each analysis was developed, in hard copy and in electronic format with original formulas intact.

(g)   If no formal, documented analysis is performed on each record, explain why it is not performed.

(h)   If subjective judgement is used instead of some formal, documented analysis, explain why a subjective method was chosen over a formal method.

(i)   If subjective judgement is used, explain in detail how this process works to arrive at a decision for what tolerance level to use.
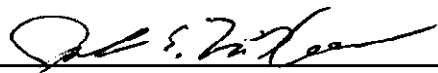
UPS/USPS-T5-57. Can you confirm that all records labeled with SYS=PI-SB and Class=SB are strictly Parcel Post records? If not, explain why you cannot confirm and explain in detail what other variables are required to determine Parcel Post records.

(a)   Do these transactions only represent transactions provided with PS Form 3605? If not, what other PS Forms are represented by these records, and how can records be identified as having come from sources other than PS Form 3605?

(b)   Priority Mail is also reported on 3605. How does the program keep Priority Mail separated from Parcel Post? If some variable other than VIP is used, provide a list of which ones and explain in detail what values are associated with each variable to identify each Parcel Post record.

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.

John E. McKeever
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Dated: March 22, 2000
Philadelphia, Pa.

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