

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
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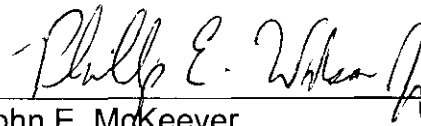
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PICKETT
(UPS/USPS-T19-4 through 13)
(March 23, 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 Pickett: UPS/USPS-T19-4 through 13.

Respectfully submitted,



John E. McKeever
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INTERROGATORIES AND REQUEST FOR PRODUCTION OF
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UPS/USPS-T19-4. Refer to the Postal Service's response to UPS/USPS-T1-17, redirected from witness Xie.

(a) Explain why Salt Lake City, UT, was added to the Eagle Network, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Salt Lake City to the Eagle Network.

(b) Explain why Portland, OR, was added to the Eagle Network, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Portland to the Eagle Network.

(c) Explain the reasons why Spokane, WA, was added to the Western Network on May 27, 1997, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Spokane, WA, to the Western Network at that time.

(d) Explain why Billings, MT, was added to the Western Network on May 27, 1997, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Billings, MT to the Western Network at that time.

(e) Explain the reasons why Boise, ID, was added to the Western Network on May 27, 1997, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Boise, ID to the Western Network at that time.

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UPS/USPS-T19-5. How does the Postal Service measure utilization of the Eagle and Western networks? Provide the utilization of each of those networks separately for (i) FY1998, and (ii) FY1999.

UPS/USPS-T19-6. Refer to the Postal Service's response to UPS/USPS-T1-17, redirected from witness Xie, regarding the Eagle and Western Networks.

(a)(i) Provide data on the maximum carrying capacity of the 727-100s used on the Eagle network. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(b)(i) Provide data on the carrying capacity of the 727-200s used on the Eagle network. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(c)(i) Provide data on the carrying capacity of the 727-200s used on the Western network. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

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(d)(i) Provide data on the carrying capacity of the DC-9-30s used on the Western network during the period from May 27, 1997, through August 27, 1999. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(e)(i) Provide data on the carrying capacity of the DC-9-15s used on the Western network during the period from May 27, 1997, through August 27, 1999. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(f)(i) Provide data on the carrying capacity of the Metro III that was used on the Western network during the period from May 27, 1997, through August 27, 1999. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(g)(i) Provide data on the carrying capacity of the Beechcraft 1900 used on the Western network during the period from May 27, 1997, through August 27, 1999.

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Provide this data both in terms of the cubic footage of cargo capacity available on this aircraft, and the maximum weight that it can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

UPS/USPS-T19-7. Refer to the Postal Service's response to UPS/USPS-T1-17, redirected from witness Xie, regarding the Eagle and Western networks.

(a) Explain why the Postal Service changed equipment for the Western Network to 727-200s.

(b) Confirm that the change on August 29, 1999, from the use of DC-9s on the Western Network to 727-200s provided a substantial increase in carrying capacity for that network. If confirmed, explain the reason for this expansion of capacity; if not confirmed, explain.

(c) Provide copies of any studies, memoranda, or correspondence relating to the decision to change equipment from DC-9s to 727-200s for the Western Network at this time.

UPS/USPS-T19-8. Provide the number of pieces, the number of pounds, the number of pound-miles, and the number of cubic foot-miles for BY1998 by accounting period for the total volume of mail carried on the Eagle Network.

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UPS/USPS-T19-9. Provide the number of pieces, number of pounds, number of pound-miles, and number of cubic foot-miles for BY1998 by accounting period for the total volume of Express Mail carried on the Eagle Network.

UPS/USPS-T19-10. Provide the number of pieces, number of pounds, number of pound-miles, and number of cubic foot-miles for BY1998 by accounting period for the total volume of mail carried on the Western Network.

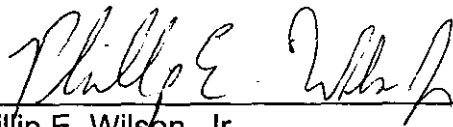
UPS/USPS-T19-11. Provide the number of pieces, number of pounds, number of pound-miles, and number of cubic foot-miles for BY1998 by accounting period for the total volume of Express Mail carried on the Western Network.

UPS/USPS-T19-12. Describe any circumstances in which a 727-100 or a 727-200 would reach maximum capacity in terms of weight before reaching maximum capacity in terms of volumetrics (cubic feet or other similar measure).

UPS/USPS-T19-13. Describe any circumstances in which a 727-100 or a 727-200 would reach maximum capacity in terms of volumetrics (cubic feet or other similar measure) before reaching maximum capacity in terms of weight.

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.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: March 23, 2000
Philadelphia, Pa.

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