

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL
SERVICE TO UNITED STATES POSTAL
SERVICE WITNESS BARON
(UPS/USPS-T12-5 through 11)
(March 23, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Baron: UPS/USPS-T12-5 through 11.

Respectfully submitted,

John E. McKeever

John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

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UPS/USPS-T12-5. Refer to page 6 of Library Reference USPS-LR-I-157, "Calculating Average Predicted Load Times and Predicted Load Times at Average Volumes." Provide the following input files in electronic form used in your LOAD98.CNTL program:

ALDRAN.CITY.PQTOTAL.PQ1FY98;
ALDRAN.CITY.PQTOTAL.PQ2FY98;
ALDRAN.CITY.PQTOTAL.PQ3FY98; and
ALDRAN.CITY.PQTOTAL.PQ4FY98.

UPS/USPS-T12-6. Refer to Library Reference USPS-LR-I-157, "Calculating Average Predicted Load Times and Predicted Load Times at Average Volumes." Provide an electronic copy of the SAS code for LOAD98.CNTL.

UPS/USPS-T12-7. Refer to page 3 of Library Reference USPS-LR-I-157, "Calculating Average Predicted Load Times and Predicted Load Times at Average Volumes," where you state that the first data set used in your analysis is based on the 1985 load-time field survey.

(a) Provide the definition of "parcels" used in the 1985 load-time study, including a page and line number if you include a reference in your answer.

(b) Does the definition of parcels used in the 1985 load-time study match exactly the definition of parcels used in the FY1998 City Carrier Cost System? If not, explain all differences and indicate the effect of those differences on your analysis.

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(c) In the 1985 load-time survey, were the characteristics of parcels, such as weight and class/subclass of mail, recorded? If so, provide (i) a table that shows the distribution of parcels by weight, class and subclass, and (ii) the files and programs that were used to perform this calculation. If not, (i) identify any studies that were performed between FY1983 and FY1987 that collected the characteristics of parcels, such as weight and class/subclass of mail, (ii) provide a table that shows the distribution in each study of parcels by class and subclass, and (iii) provide the files and programs that were used to perform this calculation for each study.

UPS/USPS-T12-8. Refer to USPS-LR-I-158, "The Calculation of Elasticities of Running Time with Respect to Actual Stops." Provide an electronic copy of the SAS code for the following programs:

CCS.CATFAT.CURB.R00.CNTL;
CCS.CATFAT.FOOT.R00.CNTL; and
CCS.CATFAT.LOOP.R00.CNTL.

UPS/USPS-T12-9. Refer to USPS-LR-I-158, "The Calculation of Elasticities of Running Time with Respect to Actual Stops."

(a) Provide full copies of the LOG files for the following programs:

CCS.CATFAT.CURB.R00.CNTL;
CCS.CATFAT.FOOT.R00.CNTL; and
CCS.CATFAT.LOOP.R00.CNTL.

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(b) It appears from the gaps in the line counts that some of the program lines are missing. These gaps are indicated in the table below:

CCS.CATFAT.CURB.R0 0.CNTL		CCS.CATFAT.FOOT.R0 0.CNTL		CCS.CATFAT.LOOP.R0 0.CNTL	
Line Before Gap	Line After Gap	Line Before Gap	Line After Gap	Line Before Gap	Line After Gap
13	175	13	91	13	213
176	338	92	170	214	414
339	502	171	250	415	615
Last line: 604		Last line: 354		Last line: 719	

(i) Confirm that these are gaps, explain why there are gaps in these log files, and provide copies of the log files without any gaps.

(ii) Confirm that the last line in each program file is that which is listed in the table above. If not confirmed, provide copies of the log files without missing lines.

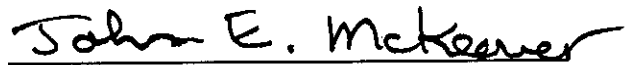
UPS/USPS-T12-10. Refer to USPS-LR-I-159, "Calculation of Street Time Proportions." Provide an electronic copy of the SAS code for EN.CNTL.

UPS/USPS-T12-11. Refer to USPS-LR-I-159, "Calculation of Street Time Proportions." Provide an electronic version of the following input files:

ALDRAN.FOS.STS.SAS.DATA and ALDRAN.HQ059T01.CITY.PQ4FY97.

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

Attorney for United Parcel Service

Dated: March 23, 2000
Philadelphia, Pa.

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