

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 PAFFORD TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T4-11)

The United States Postal Service hereby provides the response of witness Pafford to the following interrogatory of United Parcel Service: UPS/USPS-T4-11, filed on March 15, 2000.

The 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

*K N Hollies*

Kenneth N. Hollies

**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

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March 29, 2000

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

**UPS/USPS-T4-11.** Refer to Library Reference USPS-LR-I-30.

- (a) Provide Appendices C, D, E, and J of USPS-LR-I-30 in electronic SPREADSHEET format, with each spreadsheet provided in its fully developed form (formulas intact).
- (b) Appendices A, B, F, G, H, and I of USPS-LR-I-30 are SAS programs that appear to have been masked with respect to certain data. Provide
  - (i) electronic copies of these programs in their fully developed form, and
  - (ii) in electronic format, all data input files for these programs so that the output results of each program can be replicated.

**RESPONSE:**

(a) Spreadsheets shown in Appendices C and D are being made available as USPS-LR-I-249, Material Provided in Response to UPS/USPS-T4-11 (Pafford). The computer algorithm shown in Appendix E is a SAS computer program, not a spreadsheet. The spreadsheet shown in Appendix J was previously provided as USPS-LR-I-227, in response to interrogatory request UPS/USPS-T4-10.

(b) The subparts are:

(i) Electronic versions of the SAS programs shown in Appendices A, B, F, G, H, have already been provided as part of USPS-LR-I-30.

(ii) Input data sets are being made available as USPS-LR-I-249, Material Provided in Response to UPS/USPS-T4-11 (Pafford). The following is the crosswalk of the PC file names in USPS-LR-I-249 to the input file names shown in USPS-LR-I-30:

<u>USPS-LR-I-249</u> <u>Filenames</u>	<u>USPS-LR-I-30 Reference</u>
D2SUM.TXT	HSISMN.RPW.D2SUM.FY98QT2
UCODE23.TXT	H22493.FY982.UCODE23.DATA
PS060D03.TXT	HSI.HQN.PS060D03.FY98QT2
CATEGORY.TXT	H22493.RPW.FY98.CATEGORY.EOY.DIR
CODREG.TXT	H22493.FY982.CODREG.DATA
DRPW.TXT	H22493.FY982.DRPW.DATA
MISC.TXT	H22493.FY982.MISC.DATA
SIRVO.TXT	H22493.SIRVO.RPWSUM.PQ9802.ADJII.DATA
IRPW.TXT	H22493.FY982.IRPW.DATA
AUANYN1.BIN 1/	AUANYN.BV910T01.NATL.AP0498
AUANYN2.BIN 1/	AUANYN.BV910T01.NATL.AP0598
AUANYN3.BIN 1/	AUANYN.BV910T01.NATL.AP0698

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

USPS-LR-I-249

Filenames

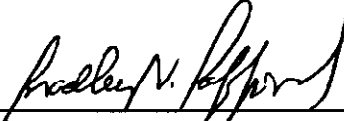
USPS-LR-I-30 Reference

TBRPT.TXT	H22493.RPW.FY98.CNTL(TBRPT)
TRIALBAL.TXT	H22493.FY982.TRIALBAL.DATA
BRPW.TXT	H22493.FY982.BRPW.DATA
SUMLABEL.TXT	H22493.RPW.FY98.CNTL(SUMLABEL)
DETAIL1.TXT	H22493.FY980.RPW.DETAIL.FY.DATA
DETAIL2.TXT	H22493.FY982.RPW.DETAIL.FY.DATA
DETAIL3.TXT	H22493.FY983.RPW.DETAIL.FY.DATA
DETAIL4.TXT	H22493.FY985.RPW.DETAIL.FY.DATA

1/ These files contain data stored as packed decimal, and therefore are created in binary format.

DECLARATION

I, Bradley V. Pafford, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Bradley V. Pafford

Date: March 29, 2000