

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 BOZZO TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T15-18-20)

The United States Postal Service hereby provides the responses of witness Bozzo to the following interrogatories of United Parcel Service: UPS/USPS-T15-18-20, filed on March 17, 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.
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March 31, 2000

**Response of United States Postal Service Witness Bozzo
to Interrogatories of United Parcel Service**

UPS/USPS-T15-18. In the estimation dataset contained in library reference USPS-LR-I-107, the following sites have no piece handlings in any of the MODS operations at the start of the 24 periods sampled, but come in with positive piece handlings elsewhere in the sample:

Sites 27, 39, 48, 128, 160, 168, 177, 188, 189, 192, 196, 266, 267.

For each of these sites, explain whether (a) this is a new site which came into existence during the time period sampled, (b) this site did not report data into the MODS system, or (c) there is some other explanation for the zero piece handlings across all MODS groups at the start of the sample. If your answer is (c), provide the explanation or explanations.

UPS/USPS-T15-18 Response.

The requested explanations are provided in the table below. It is my understanding that additions of facilities to MODS are most commonly related to expansions of the facilities to include automated sorting equipment.

Site ID	Reason
27	New facility
39	Existing facility added to MODS
48	Existing facility added to MODS
128	New facility
160	Existing facility added to MODS
168	Existing facility added to MODS
177	Existing facility added to MODS
188	Existing facility added to MODS
189	Existing facility added to MODS
192	New facility
196	New facility
266	New facility
267	Existing facility added to MODS

**Response of United States Postal Service Witness Bozzo
to Interrogatories of United Parcel Service**

UPS/USPS-T15-19. In the estimation dataset contained in library reference USPS-LR-I-107, the following sites have no piece handlings in any of the MODS operations at the end of the 24 periods sampled:

Sites 44, 177, 320.

For each of these sites, explain whether (a) this site closed down its operations, (b) this site did not report data into the MODS system, or (c) there is some other explanation for the zero piece handlings across all MODS groups at the end of the sample. If your answer is (c), provide the explanation or explanations.

UPS/USPS-T15-19 Response.

The requested explanations are provided in the table below.

Site ID	Reason
44	Site no longer reports MODS (downsized from plant to delivery distribution center)
177	Site no longer reports MODS (mail processing volumes were moved to another facility beginning Q498; now an Associate Office)
320	Site's data not uploaded to Corporate Data Base in Q498

Response of United States Postal Service Witness Bozzo
to Interrogatories of United Parcel Service

UPS/USPS-T15-20. In the estimation dataset contained in library reference USPS-LR-I-107, the following sites have intermittent periods of zero piece handlings across all MODS groups during the sample:

Sites 196, 231, 316.

For each of these sites, explain whether (a) this site temporarily closed down its operations, (b) this site did not report data into the MODS system, or (c) there is some other explanation for the intermittent zero piece handlings across all MODS groups. If your answer is (c), provide the explanation or explanations.

UPS/USPS-T15-20 Response.

I am not certain how you intend to define the term "intermittent." Sites 231 and 316 report data for all periods except for a single interval in which they do not report data, as listed below. As indicated in the response to UPS/USPS-T15-18, site 196 is a new site that came into existence during the period covered by my data set; it appears to regularly report MODS data for all operations except manual parcels from Q4 '94 to Q4 '98.

Site ID	Reason
196	See above
231	Removed from list of MODS sites in FY94 due to lack of plant designation. Added back in FY95 due to amount of mail processing and automation equipment.
316	Site's data not uploaded to Corporate Data Base in Q198

DECLARATION

I, A. Thomas Bozzo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A. Thomas Bozzo

Dated: 3/31/00

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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