

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
APR 5 4 34 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

SUPPLEMENTAL RESPONSES OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE
UPS/USPS-T1-18, 22, 25-27

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service (UPS): UPS/USPS-T1-18, 22, 25-27, filed on February 28, 2000, and redirected from witness Xie.

Witness Xie provided her responses to these interrogatories on March 13, 2000. Thereafter, UPS moved to compel further responses from the witness. The Postal Service responded to that motion on March 29, 2000 by indicating that the motion to compel was being construed as follow up institutional interrogatories, and that answers would be provided.

The responses refer to a library reference, USPS-LR-I-288, which will be filed as soon as the resources to complete its preparation are available, which will be by the end of the week.

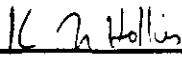
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:


Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
April 5, 2000

**SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE)**

UPS/USPS-T1-18. The TRACS Commercial Air Subsystem (USPS-LR-I-49) and the TRACS Network Air Subsystem (USPS-LR-I-51) computer programs make use of a number of computer data files from the Air Contract Support System (ACSS). In the documentation of the Subsystem, these files are named LAUSTNT.PS476TCR.FYWK98ww, where ww represents two digits that indicate the week within the year. USPS-LR-I-49 and I-51, at 15. Provide a list of all of the variables contained in the entire set of files, beyond those listed in Appendix I of USPS-LR-I-49, and a description of each, for 1998 and any other time periods currently available.

RESPONSE.

See USPS-LR-I-288 for a list of the variables and their descriptions for the file named LAUSTNT.PS476TCR.FYWK98ww.

**SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE)**

UPS/USPS-T1-22. The TRACS Network Air Subsystem (USPS-LR-I-51) computer programs make use of a computer data file from the National Air and Surface System (NASS). In the documentation of the Subsystem, this file is named LAXSTN.PS272D14(0). USPS-LR-I-51, at 14. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-51, and a description of each, for 1998 and any other time periods currently available.

RESPONSE.

See USPS-LR-I-288 for a list of the variables and their descriptions for the file named LAXSTN.PS272D14(0).

**SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE)**

UPS/USPS-T1-25. The TRACS Highway Subsystem (USPS-LR-I-52) computer programs make use of a computer data file from the National Air and Surface System (NASS). In the documentation of the Subsystem, this file is named LAXSTN.PS272D13(0). USPS-LR-I-52, at 26. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-52, and a description of each, for 1998 and any other time periods currently available.

RESPONSE.

See USPS-LR-I-288 for a list of the variables and their descriptions for the file named LAXSTN.PS272D13(0).

**SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE)**

UPS/USPS-T1-26. The TRACS Highway Subsystem (USPS-LR-I-52) computer programs make use of computer data files from the Highway Payment Master File. In the documentation of the Subsystem, this file is named ACR.ST008T11. USPS-LR-I-52, at 26. Provide a list of all of the variables contained in the entire file, beyond those listed in Appendix I of USPS-LR-I-52, and a description of each, for 1998 and any other time periods currently available.

RESPONSE.

See USPS-LR-I-288 for a list of the variables and their descriptions for the file named ACR.ST008T11.

**SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS XIE)**

UPS/USPS-T1-27. The TRACS Highway Subsystem (USPS-LR-I-52) computer programs make use of two computer data files from the Highway Contract Support System (HCSS). In the documentation of the Subsystem, these files are named `userid.ACR95.COSTCFM.FLAT.TEXT` and `userid.ACR.INTRASCF.BOXDEL.TEXT`. USPS-LR-I-52, at 27. Provide a list of all of the variables contained in the entire set of files, beyond those listed in Appendix I of USPS-LR-I-52, and a description of each, for 1998 and any other time periods currently available.

RESPONSE.

The only additional variable on those files, beyond those listed in Appendix I of USPS-LR-I-52, is the account number.