

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

RECEIVED
APR 6 4 53 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BARON TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T12-6-11)

The United States Postal Service hereby provides the responses of witness Baron to the following interrogatories of United Parcel Service: UPS/USPS-T12-6-11, filed on March 23, 2000. Interrogatory UPS/USPS-5 was redirected to witness Harahush. A declaration will be filed later.

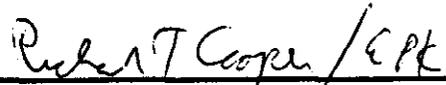
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
April 6, 2000

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

UPS/USPS-T1 2-6. 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.

RESPONSE:

This electronic copy will be included in a new library reference, USPS LR-I-290.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

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 FY 1998 City Carrier Cost system? If not, explain all differences and indicate the effect of those differences on your analysis.
- (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.

RESPONSE:

(a) A parcel was defined in the 1985 load-time study as "mail which is too large or cumbersome to case in a letter or flat case." (Docket No. R87-1, USPS LR-E-4, Load Time Variability Test, at 38).

(b) Yes.

(c) Weight, class/subclass, and other characteristics of parcels were not recorded in the 1985 load-time survey. I am unaware of any studies from FY 1983 through FY 1987 that collected data on these characteristics.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

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.ROO.CNTL;
CCS.CATFAT.FOOT.ROO.CNTL; and
CCS.CATFAT.LOOP.ROO.CNTL.**

RESPONSE:

Electronic copies of these programs will be included in USPS LR-I-290.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

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.ROO.CNTL;
CCS.CATFAT.FOOT.ROO.CNTL; and
CCS.CATFAT.LOOP.ROO.CNTL.**

(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.ROO.CNTL		CCS.CATFAT.FOOT.ROO.CNTL		CCS.CATFAT.LOOP.ROO.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.

RESPONSE:

(a) These programs were executed through the use of mainframe SAS, not PC SAS. Mainframe SAS produces one OUTLIST, which includes both the LOG and LIST files that are produced by PC SAS. The OUTLIST files for CCS.CATFAT.CURB.ROO.CNTL, CCS.CATFAT.FOOT.ROO.CNTL, and CCS.CATFAT.LOOP.ROO.CNTL are included in USPS LR-I-158.

(b) (i) Not confirmed. The OUTLIST files do not include these lines that are part of the CNTL programs. These lines contain the regression coefficients that are input into the program using the CARDS statement. Data that is input using the CARDS statement is not shown in SAS OUTLIST files.

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

(b) (ii) Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

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

RESPONSE:

This electronic copy will be included in USPS LR-I-290.

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

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.HQ059TOI .CITY.PQ4FY97.

RESPONSE:

ALDRAN.FOS.STS.SAS.DATA is a mainframe SAS data set that is composed of a subset of the data in the Engineered Standards Database. The Engineered Standards database is documented in USPS LR-I-163. An extract of the ALDRAN.HQ059TOI .CITY.PQ4FY97 file containing the specific data that were input into the estimation of street-time proportions has been included in USPS LR-I-290, which is being filed in response to this interrogatory plus interrogatories 6, 8, and 10. These extracted data are contained in the Excel workbook ESCMF.xls, which will be included in LR-I-290.

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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
April 6, 2000