

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

RECEIVED
APR 6 4 44 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
TO INTERROGATORIES OF
UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE
(UPS/USPS-T1-50(b)-(c)-60)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T1-50(b)-(c)-60, filed on March 23, 2000, and redirected from witness Xie.

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



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
April 6, 2000

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-50. The following questions deal with the movement of Priority Mail by highway transportation.

(a) In what types of containers, pallets, or loose items is Priority Mail handled when it moves by highway? Be specific as to the type of container, type of sack, etc. What is the proportion of use across the container types, and what measure is used to answer this question? (For example, "Priority mail moves in nylon sacks 25% of the time, as measured by cubic-foot miles.")

(b) How does a worker unloading a truck determine the priority for unloading?

(c) Are the items on a truck identified as to approximate mail composition?

(ii) Is time-sensitive mail identifiable as such by a worker?

(iii) Is it Postal Service policy or the typical procedure that time sensitive mail be unloaded from a truck first, to the extent possible, by the arrangement of mail within the truck? If not, what is the policy or typical procedure for unloading time sensitive mail?

(iv) Is it Postal Service policy or the typical procedure that low priority containers/pallets/ sacks are set aside so that higher priority mail may be processed first?

(v) Is it Postal Service policy or the typical procedure that high priority mail is expedited in moving from the dock to the next stage of processing? If not, what is the policy or typical procedure for moving high priority mail from the dock to the next stage of processing?

(vi) What categories of mail are considered to be high priority mail or time-sensitive mail for the purposes of loading and unloading trucks and for dock handling?

(vii) Describe any other policies or procedures that determine the sequence in which different classes or subclasses of mail or individual items or groups of items of mail are processed as they are removed from a truck, after removal, prior to loading, and during the loading process.

RESPONSE

(a) Answered by witness Xie.

(b) Generally, a worker will unload a truck from back to front.

(c)(i) Express Mail items and sometimes Priority Mail are loaded in the back of the vehicle and are readily identifiable. In the BMC network, Periodicals and other preferential mail are tailgated (loaded at the back) so that they will be unloaded first. Placards on containers and pallets give some indication of

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

content. Also, mail is loaded by office so that the mail on the front of the vehicle generally comes from the first office, then comes mail from the second office and so on.

(ii) See response to (b)(i) above.

(iii) See response to (b)(i) above.

(iv) No. Containers/pallets/sacks are moved to appropriate staging areas for the mail processing operations where the mail will be worked. Generally, space limitations within the plants, particularly near dock doors, does not permit "setting aside" containers/pallets/sacks in the manner implied by the question.

(v) Express Mail typically gets high priority attention. Otherwise mail is moved to the staging areas described in the response to (b)(iv) above.

(vi) See response to (b)(i) and (b)(vii) below.

(vii) As mail is unloaded from a truck, it is moved from the dock to its respective operation based on class, shape, presort, and/or containerization. Depending on the arrival time and the operation's critical entry time, tow operators or mail handlers will usually move the most time constrained volumes first. However, given limited dock space, the amount of time difference between the first and the last mail from a truck to arrive at its intended operation is generally not drastic. Once mail is in the operation, it is to be worked in FIFO in most instances (for example, in-home dates may be a variation to this for Standard Mail). When mail is ready to be loaded on trucks,

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

containers are sent to the dock to be loaded on the truck or staged at dock doors. When loading the truck, often Express Mail and Priority Mail are loaded on the tail to allow for expedited handling at destination. If there is a capacity issue for a particular day or run, then Standard Mail may be staged at the dock until all of the committed mail (Express, Priority, First-Class and Periodicals) is loaded. Distribution priorities for mail processing are in POM 453 and for delivery in POM 62.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-51. Confirm that the Transportation Information Management Evaluation System (TIMES) is used to track container flow through the highway system, and describe the purpose of the TIMES system.

RESPONSE

Confirmed. TIMES is an automated system that enables electronic capture of transportation data to monitor on-time performance and measure transportation utilization. TIMES can track container flows through the highway transportation system.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-52. Provide the number of facilities that are currently monitored as part of the TIMES system, by type (BMC, P&DC, SCF, etc.). Give current mail volume by type. If a mail volume measure is not available, provide an alternative measure of throughput.

RESPONSE

The total number of sites that are currently on TIMES is approximately 434. This includes Processing and Distribution Centers (P&DCs), transportation hub facilities, Mail Transportation Equipment Service Centers (MTESCs) and Airport Mail Centers (AMCs). Bulk Mail Centers (BMCs) use the Vehicle Tracking & Analysis Performance System (VTAPS) as the primary transportation system and that system interfaces with TIMES.

AMCs	58
MTESCs	2
Hubs	8
P&DCs	366

TIMES does not measure mail volume. It is not clear what is meant by "throughput" other than mail volume.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-53. Indicate whether all facilities are monitored using the TIMES system. If not, explain how the decision is made to include or exclude a facility from monitoring.

RESPONSE

No. TIMES is designed for processing facilities with significant container volumes. BMCs already use VTAPS (see response to UPS/USPS-T1-5). Other facilities such as stations and branches are too small to warrant the deployment of TIMES.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-54. Does TIMES record only information on containers, or does it also record information on pallets and loose mail? Provide the appropriate documentation to support your answer.

RESPONSE

Yes, TIMES collects some information on containers, pallets and loose mail.

This information is incomplete, however, since these fields are not required. See response to UPS/USPS-T1-57. Attached is a copy of a TIMES daily log report showing the fields that TIMES can capture. Operator names have been redacted.

TRANSPORTATION INFORMATION MANAGEMENT EVALUATION SYSTEM
DAILY LOG REPORT

FACILITY: 200 WASHINGTON DC P&DC
DIRECTION: BOTH WD
DATA ORIGIN: HISTORY

DATE: 03/15/00 - 03/15/00 TIME: 00:00 - 04:00
ROUTES: - TRIPS:

SERVICE TYPE: HCR, PVS
DROP SHIP, AMTRAK
RMIS, PIP

FROM/TO	ROUTE	TRIP	SCHED DATE/TIME	ACTUAL DATE/TIME	START		END		PERCENTS			NUMBER OF CONTAINERS (F/E)				EXP		DELAY		DRIVER	DOOR OPER	REMARKS	
					LOAD DATE/TIME	UNLOAD DATE/TIME	LOAD DATE/TIME	UNLOAD DATE/TIME	PRF	PRI	FULL	BED	GP	BMC	AMT	HAM	PAL	PIECES	5500				5466
WASHINGTON DULLES AMF	200V8	106	03/15/00 00:01	03/15/00 00:05	03/15/00 00:03	03/15/00 00:03	0	0	7	0	0/0	0/0	0/0	0/0	0	N	N	0	1800444				
WASHINGTON NATIONAL AMC	200V8	8401	03/15/00 00:01	* CANCELED *																		NO TRIP	
WASHINGTON NATIONAL AMC	200V8	A113	03/15/00 00:01	03/15/00 00:04	03/15/00 00:00	03/15/00 00:01	0	0	15	0	0/0	0/0	0/0	0/0	0	N	N	0	8733078				
PHILADELPHIA PA / AMTRAK STA	180XV	4	03/15/00 00:15	03/15/00 00:16	03/15/00 00:14	03/15/00 00:14	0	0	10	0	0/0	0/0	0/0	0/0	0	N	N		23122				
WASHINGTON NATIONAL AMC	200V8	B100C	03/15/00 00:15	* CANCELED *																		no data	
DULLES P&DC	201AT	7	03/15/00 00:15	* CANCELED *																		NO DATA	
CHARLOTTEVILLE VA P&DF	22916	2	03/15/00 00:15	03/15/00 00:15	03/15/00 00:13	03/15/00 00:14	0	0	35	0	0/0	0/0	0/0	0/0	0	N	N		7				
CAPITAL METRO HASP	207L2	0	03/15/00 00:20	03/15/00 00:18	03/15/00 00:18	03/15/00 00:18	0	0	5	0	1/0	0/0	0/0	0/0	0	N	N		304623		38		
WASHINGTON NATIONAL AMC	200V8	6403	03/15/00 00:30	* CANCELED *																		NOT SCHED	
WASHINGTON NATIONAL AMC	200V8	B100A	03/15/00 00:30	03/15/00 00:37	03/15/00 00:30	03/15/00 00:35	0	0	70	0	0/0	0/0	0/0	0/0	0	N	N	7	1800446				
WASHINGTON NATIONAL AMC	201AT	7	03/15/00 00:30	* CANCELED *																		SCHED CHG	
BALTIMORE P&DC MD	212V8	354C	03/15/00 00:30	03/15/00 00:30	03/15/00 00:31	03/15/00 00:31	0	0	10	0	0/0	0/0	2/0	0/0	0	N	N		7732086				
CAPITAL METRO HASP	207L2	10	03/15/00 00:40	03/15/00 00:40	03/15/00 00:30	03/15/00 00:38	0	0	100	0	0/0	0/0	0/0	0/0	0	N	N		304614				
SOUTHERN MARYLAND P&DC	200V8	B108	03/15/00 00:45	03/15/00 00:45	03/15/00 00:48	03/15/00 00:47	0	0	45	0	6/0	0/0	1/0	0/0	0	N	N		1800478		26		
WASHINGTON NATIONAL AMC	200V8	8407	03/15/00 01:00	03/15/00 01:00	03/15/00 00:55	03/15/00 00:58	0	0	50	0	0/0	0/0	0/0	0/0	0	N	N		1800454				
NORTHERN VIRGINIA GMF	200V8	8803	03/15/00 01:00	03/15/00 01:00	03/15/00 00:58	03/15/00 00:58	0	0	25	0	0/0	0/0	0/0	0/0	0	N	N		1800439				
SOUTHERN MARYLAND P&DC	200V8	B103	03/15/00 01:00	03/15/00 01:00	03/15/00 00:57	03/15/00 00:58	0	0	40	0	0/0	0/0	0/0	0/0	0	N	N		1800478				
DULLES P&DC	200V8	B115	03/15/00 01:00	03/15/00 01:00	03/15/00 00:55	03/15/00 00:58	0	0	80	0	0/0	0/0	0/0	0/0	0	N	N		1738011				
BALTIMORE P&DC MD	200V8	B116A	03/15/00 01:00	03/15/00 01:00	03/15/00 00:58	03/15/00 00:58	0	0	15	0	0/0	0/0	0/0	0/0	0	N	N		1800467				
SUBURBAN MD P&DC	200V8	B119	03/15/00 01:00	03/15/00 01:00	03/15/00 00:58	03/15/00 00:58	0	0	30	0	0/0	0/0	0/0	0/0	0	N	N		8733070				
WASHINGTON MTEBC	207NT	533	03/15/00 01:00	* CANCELED *																		NO DATA	
EASTON POST OFFICE MD	21811	1	03/15/00 01:00	03/15/00 00:50	03/15/00 00:51	03/15/00 00:52	0	0	80	0	0/0	0/0	0/0	0/0	0	N	N		16		37		
CUMBERLAND POST OFFICE MD	21511	1	03/15/00 01:05	03/15/00 01:10	03/15/00 01:11	03/15/00 01:12	0	0	100	0	0/0	0/0	0/0	0/0	0	N	N	9	3			40	
WASHINGTON NATIONAL AMC	200V8	A113D	03/15/00 01:10	03/15/00 01:10	03/15/00 01:10	03/15/00 01:11	0	0	10	0	0/0	0/0	0/0	0/0	0	N	N		8745219				
CAPITAL METRO HASP	207L2	11	03/15/00 01:10	03/15/00 01:05																			
BALTIMORE P&DC MD	212V8	354D	03/15/00 01:10	03/15/00 01:10	03/15/00 01:09	03/15/00 01:09	0	0	5	0	0/0	0/0	0/0	0/0	0	N	N		7732086				
CUMBERLAND POST OFFICE MD	21811	2	03/15/00 01:10	03/15/00 01:10																			
WASHINGTON MTEBC	207NT	534	03/15/00 01:15	* CANCELED *																		NO TRIP	
EASTON POST OFFICE MD	21811	2	03/15/00 01:15	03/15/00 01:15	03/15/00 01:07	03/15/00 01:09	0	0	50	0	0/0	0/0	0/0	0/0	0	N	N		16				
NORTHERN VIRGINIA GMF	200V8	8814	03/15/00 01:25	03/15/00 01:22	03/15/00 01:23	03/15/00 01:24	0	0	25	0	7/0	0/0	0/0	0/0	0	N	N		8733066		30		
WASHINGTON NATIONAL AMC	200V8	8408	03/15/00 01:30	* CANCELED *																		NO TRIP	
WASHINGTON NATIONAL AMC	200V8	A113A	03/15/00 01:30	03/15/00 01:43	03/15/00 01:40	03/15/00 01:43	0	0	45	0	0/0	0/0	0/0	0/0	0	N	N	7	8745219				
WASHINGTON NATIONAL AMC	200V8	B123A	03/15/00 01:30	* CANCELED *																		NO DATA	
CAPITAL METRO HASP	207L2	12	03/15/00 01:40	03/15/00 01:28	03/15/00 01:10	03/15/00 01:18	0	0	100	0	0/0	0/0	0/0	0/0	0	N	N		304623				
NORTHERN VIRGINIA GMF	200V8	8114	03/15/00 01:45	* CANCELED *																		NO DATA	
WASHINGTON NATIONAL AMC	200V8	8404	03/15/00 01:45	* CANCELED *																		NO DATA	
WASHINGTON NATIONAL AMC	200V8	B100D	03/15/00 01:45	03/15/00 01:40	03/15/00 01:40	03/15/00 01:41	0	0	7	0	0/0	0/0	0/0	0/0	0	N	N		1800446				
BALTIMORE P&DC MD	200V8	B107B	03/15/00 01:45	03/15/00 02:26	03/15/00 02:26	03/15/00 02:30	0	0	50	0	5/0	0/0	1/0	1/0	0	N	N		437			36	
WASHINGTON NATIONAL AMC	200V8	201AT	8	03/15/00 01:45	03/15/00 01:28	03/15/00 01:21	03/15/00 01:26	0	0	100	0	0/0	0/0	0/0	0/0	0	N	N		204580			18
WASHINGTON DC AMTRAK STATION	200V8	8002	03/15/00 01:54	03/15/00 01:46																			
SUBURBAN MD P&DC	200V8	8803	03/15/00 02:00	03/15/00 02:00	03/15/00 01:59	03/15/00 01:59	0	0	5	0	0/0	0/0	0/0	0/0	0	N	N		8733066				

ATTACHMENT
UPS/USPS-TI-5X
PAGE 1 OF 1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-55. Does TIMES record information on the contents, exact or approximate, of a container/pallet/loose item, or of a component of the contents? Provide the appropriate documentation to support your answer.

RESPONSE

The contents of containers, pallets, and loose items are not included in TIMES.

TIMES can record the percent of the load that is preferential and Priority; these are not required fields, however. It also can record the number of Express Mail pieces (which can be taken to mean loose items such as Express Mail sacks).

This is also not required. TIMES is not designed to record the volume of items (e.g., sacks, trays, loose parcels) or class and subclass volume information. For documentation, see the attachment to UPS/USPS-T1-54.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-56. Does TIMES record information on all movements, or a subset or sample of all movements? If the latter, explain the process that selects the movements for which information is recorded. Provide the appropriate documentation to support your answer.

RESPONSE

TIMES is intended to collect information on all movements in facilities where it is installed. However, data input in TIMES is performed manually. This means certain facilities may not enter TIMES data when data collectors are not present or able to enter information.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-57. Describe the information recorded in the TIMES database, including the variables and the definition of an observation.

RESPONSE

TIMES has records for each vehicle arrival or departure. The fields in TIMES are:

- origin and destination facility,
- route (highway contract route identification (HCRID) code or postal vehicle service route number),
- trip number,
- scheduled arrival date and time,*
- actual arrival date and time,
- start load/unload date and time,
- end load and unload date and time,
- percent of load preferential mail,
- percent of load Priority,
- percent of load full,
- percent of load bedloaded,
- number of GPC containers empty and full,
- number of BMC containers empty and full,
- number of Amtrak containers empty and full,
- number of hampers empty and full,
- number of pallets (and pallet boxes) empty and full,

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

Express Mail items,

5500 irregularity code (indicating the contractor was not in full compliance
with his contractual responsibilities),

5466 irregularity code indicating whether Postal Service operations has
made the vehicle late in arriving,

delay code indicating why the vehicle was late,

van number,

driver name,

door operator's name,

remarks.

Data fields in TIMES are either required or not required. The required fields include arrival or departure time, time loading or unloading started, percent of load full, and percent of floor space utilized. Non required fields include driver's name, seal number, number of containers, pallets and loose items. For a general discussion of the suitability of TIMES for use in costing see witness Bradley's testimony (USPS-T-18) at 57-59. See also the attachment to UPS/USPS-T1-54.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-58. Does the TIMES database contain any information relating to mail volume by mail class or subclass, or by some other categorization of mail? Provide the appropriate documentation to support your answer.

RESPONSE

Please see the responses to UPS/USPS-T1-55 and UPS/USPS-T1-57.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-59. Is it possible to identify emergency or exceptional contracts in the TIMES database? If possible, provide the fraction of containers, or of containers and pallets and loose items, that move by emergency contracts, and the fraction that move by exceptional contracts.

RESPONSE

There is no such thing as an exceptional contract. It is not possible to reliably obtain the fraction of containers, pallets or loose items in TIMES as these are not yet required fields. Please see the response to UPS/USPS-T1-57 and the attachment to UPS/USPS-T1-54.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM
WITNESS XIE, USPS-T-1)

UPS/USPS-T1-60. The Data Quality Study prepared by A.T. Kearney makes reference to a transportation flow model, to be developed by "Operations."

(a) Has this model been implemented? If not, give the schedule for implementation.

(b) Does or will this model make use of NASS and TIMES data?

(c) If implemented, has the Postal Service followed the Study recommendation to use the model to examine cost causality issues?

(d) If not yet implemented, does the Postal Service plan to follow the Study recommendation? If so, does the Postal Service currently anticipate completion by a certain time?

RESPONSE

(a)-(d) The transportation flow model project has been canceled because of budgetary considerations. There are no plans to resurrect the project in the foreseeable future. Given these facts, there is no way to implement the recommendation.

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
April 6, 2000