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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000–1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PICKETT TO INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS–T19–4-13)

The United States Postal Service hereby provides the responses of witness Pickett to the following interrogatories of United Parcel Service: UPS/USPS–T19-4-13, filed on March 23, 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.
Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–2990 Fax –5402
April 12, 2000

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-4. Refer to the Postal Service's response to UPS/USPS-T1-17, redirected from witness Xie.

(a) Explain why Salt Lake City, UT, was added to the Eagle Network, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Salt Lake City to the Eagle Network.

(b) Explain why Portland, OR, was added to the Eagle Network, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Portland to the Eagle Network.

(c) Explain the reasons why Spokane, WA, was added to the Western Network on May 27, 1997, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Spokane, WA, to the Western Network at that time.

(d) Explain why Billings, MT, was added to the Western Network on May 27, 1997, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Billings, MT to the Western Network at that time.

(e) Explain the reasons why Boise, ID, was added to the Western Network on May 27, 1997, and provide copies of any studies, memoranda, or correspondence relating to the decision to add Boise, ID to the Western Network at that time.

RESPONSE

(a) The overnight Eagle network was expanded to Salt Lake City to provide improved overnight service for Express Mail customers in that area. I am not aware of any studies, memoranda, or correspondence on this decision.

(b) The overnight Eagle network was expanded to Portland to provide improved overnight service for Express Mail customers in that area. I am not aware of any studies, memoranda or correspondence on this decision.

(c)-(e) The daytime and nighttime Western network was reconfigured, and expanded to Spokane, Billings and Boise for two reasons:

(1) to maintain service for Express Mail and eliminate the need for air taxis and commercial air used to move First-Class Mail and Express Mail.

(2) to provide improved service for Priority Mail

In response to these interrogatories I was provided with the following two documents that provide some information on the decision-making process. One document (an email) is dated 11/24/95. This document contains a list of concerns leading up to the original WNET renewal meeting. (Ultimately, the contract was not renewed.) Please note that the names of the participants as well as some origin- and destination-specific volume information have been redacted. The other document is an Executive Summary of the meeting. It should be noted that both of these documents appear to relate to a meeting that took place long before the turning (i.e. daytime use) of WNET planes began.

Author: [redacted] at SEWA002L
Date: 11/24/95 9:53 AM
Priority: Urgent
TO: [redacted] at DECO001L
TO: [redacted] at BRCA001L
TO: [redacted] at ININ002L
TO: [redacted] at ININ002L
TO: [redacted] at WADC033L
TO: [redacted] at WADC033L
TO: [redacted] at DECO001L
TO: [redacted]
Subject: WNET #1
---------- Message Contents ----------

As agreed at the recent WNET meeting, below is a summary of our concerns discussed regarding the new WNET proposal along with your response regarding the requirements.

CONCERN:

1. The primary purpose of the new WNET is to improve the performance of Priority Mail Service performance. The aircraft departure times are much too early to capture any significant additional Priority Mail volume. Is there an opportunity to have later aircraft departure times?

   RESPONSE:
   Some WNET schedules were adjusted with later departure times. A major concern raised was the impact to Next Day Express Mail committed to the WNET.

   As part of the Headquarters review of the requirements, we will be looking closely at opportunities for later departure times for the aircraft. Specifically, we will look to move the Express Mail to commercial aircraft where Next Day Service can be maintained.

   CONCERN:

2. Aircrafts upgraded to 727-100s in the new WNET proposal. Current WNET aircrafts are operating at about 80% capacity minus the First-Class mail. Only Priority Mail volumes were submitted with the proposal and in all cases the aircraft and container capacities were severely underutilized for this single mail class. Need to get a handle on the total O&D volume by mail class planned for the WNET to justify upgrading the aircraft for Priority Mail.

   RESPONSE:
   [redacted] will be providing Headquarters the additional volumes by mail class the week of February 5.

   CONCERN:

3. Proposed tender and delivery times indicate that containers will be built by the contractor instead of the Postal Service. Contractors ground handling costs are

exorbitant, and generally it is cheaper and beneficial for the Postal Service to build and unload containers.

RESPONSE:
Agreed to change the proposal to reflect Postal built and unloaded containers. Will request in the contract the methodology for determining the cost of contractor built/unloaded containers.

CONCERN:

4. "Ramp transfers to and from all commercial carriers may be required at all points". This particular clause will result in additional cost to the contract and it is not our intent to expand the whole dedicated network to transfer to commercial aircraft.

RESPONSE:
The DEN/BIL, SEA/ANC and SLC air taxi service are the only points that currently exchange mail with commercial carriers. These are the only points that should be identified in the proposed commercial requirements package. We must however associate a cost with a network/commercial transfer for these points.

CONCERN:

5. Why can't we use our Postal facilities at ANC, DEN, LAX, OAK, and SEA instead of incurring this additional cost in the contract?

RESPONSE:
No facility or ramp space available at ANC, DEN and SEA.

From a headquarters perspective this particular issue needs to be more clearly defined. As a side note (was not discussed at the meeting) the additional building cost of a building and ramp space has to be considered in the economics of rolling the air taxi service into the network.

CONCERN:

6. New WNET proposal indicates the Postal Service will provide containers. Do we currently have containers for the WNET?

RESPONSE:
No; proposed the Postal Service purchase containers. Eagle Hub personnel indicated approximate cost at about $3500 each.

CONCERN:

7. The hub transfer time has 50 minutes between the last flight in (BIL/DEN 0030) and the first flight out (PHX/ABQ 0120). We need to review the arrival and departure times to/from the hub relative to container exchanges and distance from the hubs for that may provide for later leave times from origins.

RESPONSE:
[redacted] indicated that there are probably some adjustments that can be made to improve the scheduling. At this point we don't know what the significance of these changes.

We first will finalize the O&D pair volume and plane types before we look at the scheduling.

CONCERN:

8. There are a great many containers that have to be downloaded and topped off at intermediate points. There are a lot of containers with less than a third (reference matrix attached) of Priority Mail which will result in additional ground handling cost and time that could be used for later leave and arrive times. Based on the Priority Mail volume submitted, the total hub volume for ABQ/PHX [redacted], BIL/DEN [redacted], GEG/PDX = [redacted] LAS/RNO [redacted] SAN/LAX [redacted]. On the SAN/LAX aircraft, there is [redacted] containers to be offloaded at LAX which can be surfaced.

RESPONSE:

Uploading and downloading is part of the current WNET operation. The upgrade to the SAN/LAX aircraft is for mail destinating these airstops. The [redacted] LAX containers is mail currently being dispatch via surface as a result of the aircraft operating for destinating mail.

The container and volume issue will be reviewed in-depth when the additional volumes are received by mail class.

Based on the existing WNET data, there does not appear to be significant Priority Mail volume to justify upsizing the aircraft, however, all of the volume data is not in yet. Note that the revamped network is basically to support Priority Mail and to capture this additional volume, serious consideration should be given to having the planes depart much later after the clearance time of Priority Mail. Need to look at the Express on commercial aircraft as an alternative to maintain Next Day service and look to minimize the amount of First-Class mail used as filler (excluding the BIL & ANC for this network). When we receive the final O&D pair volumes we will issue our final recommendation on the proposed WNET package.

This WNET package is a top priority and we are looking to finalize the requirements and submit to Purchasing as expeditiously as possible.

EXECUTIVE SUMMARY

Purpose: The Pacific and Western Areas are requesting the expansion of the WNET network to improve priority service between major markets in the western United States. This expanded network would have the added advantage of combining the current network operation with a series of stand alone air taxis which have been instituted to supplement inadequate commercial lift. The result is an expanded network joining more cities utilizing larger aircraft at little additional cost.

Proposal: The request to expand the WNET is based on the need to integrate the existing network with three independent air taxis to maximize the service advantage, increase flexibility and to minimize cost. Further it responds to the request by Vice President, Allen Kane, to identify what resources would be needed for the Western Area to achieve a 95% intra-Area priority service score. The Western Area identified a need to increase both the size of the aircraft serving the network as well as the number of cities on the WNET as a essential element to achieve this objective.

Benefits: There are locations on the existing network that have inadequate lift with the current equipment utilized on the network. Increasing the size of the aircraft serving the network from DC-9's to 727-100's and DC-8's will furnish the capacity necessary to serve the added cities.

To maximize utilization of the network all of the planes on the current network serve multiple origins and destinations. The configuration of the existing network forces major origins like Seattle and Denver to have very early tender times. The smaller intermediate origins of Portland and Salt Lake City now have the later tender times. The result is that the tender times at these larger volume origins are too early to capture significant priority volumes. The new network combines Anchorage with Seattle, Spokane with Portland, Boise with Salt lake City, Billings with Denver, etc. so the larger volume origins will have the latest tender times as well as earlier delivery times. This means additional volume will be available for the WNET.

There are a number of origins (Boise, Spokane and Billings) not currently on the network which impact the Western Area's ability to achieve the 95% intra-area priority service goal. These origins do not have adequate commercial lift to achieve this level of service performance. The current dedicated air taxi service also provides capacity to move first class and Express mail. This capacity must be retained under expanded WNET. Although the mail mix would differ from the intent of the WNET contract, adding these stops would increase the reach of the WNET and thereby improve the opportunity to achieve the stated priority goal.

Cost: The expanded WNET will increase aircraft capacity. It will increase its reach. It will create transportation flexibility because an integrated air transportation network will replace a patchwork of independent air transportation contracts. The Postal Service can obtain these benefits for an estimated increase in cost of approximately $575,000.

Conclusion: The western part of the United States combines a unique set of circumstances, large geographic territory between major population centers, limited commercial transportation at the appropriate times and rapid growth. Unique transportation solutions are essential to achieve the desired level of service. The current WNET operation provides a partial solution to these problems but since its inception there has been a number of factors beyond the control of the Postal Service that require reexamination and modification of the WNET.

The expansion of the network, as recommended in this proposal, addresses these changed conditions in a manner that provides an integrated solution at minimal cost to the organization.

We believe the adoption and implementation of this proposal will greatly increase the Western Area's ability to achieve its service commitments both in priority as well as first class mail categories.

The estimated cost for the expanded WNET is $45,960,395 annually. This appears to be a significant increase over the annual cost of the existing network ($21,519,680) but one needs to consider the expanded WNET also includes the elimination of current dedicated point to point air taxis. These air taxis operate at a combined annual cost of $11,835,490. The commercial airline annual cost to move the planned WENT volumes would be $12,028,841. The total NET increase for the network will be $576,384 annually.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-5. How does the Postal Service measure utilization of the Eagle and Western networks? Provide the utilization of each of those networks separately for (I) FY1998, and (ii) FY1999.

RESPONSE

It is my understanding that the Postal Service currently uses its Dedicated Tracking System (DATS) in which utilization is recorded. These utilization figures can be deceptive as they do not reflect actual maximum carrying capacity on a given flight. As a result, a low utilization figure in DATS does not mean planes were not filled to capacity. See the responses to UPS/USPS-T22-6, 12 and 13.

(i) For FY 1998, utilization on the Eagle network was not recorded in DATS and is not available. For the Western network, utilization is available for the period January through September. For utilization rates, see the attached table.

(ii) For most of FY 1999. utilization on the Eagle network was not recorded on DATS. As a result, a utilization percentage is not available. For the Western network, utilization is listed in the attached table.

01/01/98-09/11/98

	INBOUND		OUTBOUND	
	JETS	PROPS	JETS	PROPS
Jan-98	78.2	N/A	87.3	N/A
Feb-98	81.4	100.0	87.7	88.8
Mar-98	80.0	100.0	88.5	97.6
Apr-98	85.7	100.0	87.1	89.1
May-98	82.5	100.0	85.1	88.7
Jun-98	80.4	99.6	89.3	89.6
Jul-98	77.8	100.0	88.1	93.9
Aug-98	78.4	100.0	87.6	96.6
Sep-98	79.2	100.0	89.7	100.0
Average	80.4	100.0	87.8	93.0

09/12/98-08/27/99

	INBOUND		OUTBOUND	
	JETS	PROPS	JETS	PROPS
Sep-98	81.6	100.0	90.1	100.0
Oct-98	83.2	100.0	90.8	94.2
Nov-98	87.5	100.0	90.3	92.0
Dec-98	82.3	100.0	90.6	98.5
Jan-99	88.3	100.0	88.7	95.1
Feb-99	85.6	100.0	88.9	94.0
Mar-99	86.9	100.0	88.4	95.2
Apr-99	83.9	100.0	85.4	92.9
May-99	84.3	100.0	84.4	92.3
Jun-99	85.6	100.0	84.3	92.5
Jul-99	80.9	100.0	80.6	90.2
Aug-99	78.3	100.0	79.2	91.8
Average	84.0	100.0	86.8	94.1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-6. Refer to the Postal Service's response to UPS/USPS-T1-17, redirected from witness Xie, regarding the Eagle and Western Networks.

(a)(i) Provide data on the maximum carrying capacity of the 727-100s used on the Eagle network. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(b)(i) Provide data on the carrying capacity of the 727-200s used on the Eagle network. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(c)(i) Provide data on the carrying capacity of the 727-200s used on the Western network. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(d)(i) Provide data on the carrying capacity of the DC-9-30s used on the Western network during the period from May 27,1997, through August 27,1999. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998 and (b) FY1999.

(e)(i) Provide data on the carrying capacity of the DC-9-15s used on the Western network during the period from May 27, 1997, through August 27, 1999. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(f)(i) Provide data on the carrying capacity of the Metro III that was used on the Western network during the period from May 27, 1997, through August 27, 1999. Provide this data both in terms of the cubic footage of cargo capacity available on these aircraft, and the maximum weight that they can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FY1998, and (b) FY1999.

(g)(i) Provide data on the carrying capacity of the Beechcraft 1900 used on the Western network during the period from May 27, 1997, through August 27, 1999. Provide this data both in terms of the cubic footage of cargo capacity available on this aircraft, and the maximum weight that it can carry.

(ii) Provide the average capacity utilization rate for this type of aircraft by accounting period for (a) FYI998 and (b) FY1999.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

RESPONSE

The following responses are based on information provided to me by postal logistics experts.

(a)(i) The carrying capacity (by weight) of a Boeing 727-100 varies from day to day and night to night and is impacted by weather, distance flown, amount of fuel carried, FAA restrictions such as air worthiness directives, and distance to alternate landing stops. All of these factors constrain to various degrees the maximum load on any given flight. The cargo area of this aircraft is composed of the main body of the aircraft which holds eight A-2 containers and the belly of the aircraft which holds non-containerized mail. Each container has a capacity of 440 cubic feet of space. The container area has 3520 cubic feet available to containers and mail. With 890 cubic feet of belly space, the total cubic capacity is 4410 cubic feet. Certain 727-100s can accommodate an additional LD-11 container with a capacity of 230 cubic feet for a total capacity of 4640 cubic feet. Certain 727-100s can accommodate 9 A-2 containers for a total of capacity of 4850 cubic feet.

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

(b)(i) The maximum carrying capacity by weight of a Boeing 727-200 varies from flight to flight for the same reasons given in response to part (i)

above. Also, 727-200s come with two types of engines, referred to in the industry as light weight and heavy weight. The difference in lift capacity exceeds 10,000 pounds depending on which engine type is used. A 727-200 can carry 12 A-2 containers (5280 cubic feet) and has additional belly space (1525 cubic feet) for a total of 6805 cubic feet. Other 727-200s have space for 11 A2 containers (4840 cubic feet) and one A1 container (370 cubic feet) plus 1525 cubic feet in the belly for a total of 6735 cubic feet.

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

(c)(i) The configuration and capacity of these aircraft is the same as those discussed in part (b).

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

(d)(i) As with the aircraft discussed in parts (a)-(c) the carrying capacity of DC-9-15s varies from flight to flight. DC-9-15s have 2208 cubic feet of capacity in the container area and an additional 600 cubic feet of belly space for a total of 2808 cubic feet.

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

(e)(i) As with the aircraft discussed in parts (a)-(d) the carrying capacity of DC-9-30s varies from flight to flight. DC-9-30s have 3148 cubic feet of capacity in

the container area and an additional 898 cubic feet of belly space, for a total of 4046 cubic feet.

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

(f)(i) As with the aircraft discussed in parts (a)-(e) the carrying capacity of Metro III aircraft varies from flight to flight. Metros IIIs have 625 cubic feet of capacity.

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

(g)(i) As with the aircraft discussed in parts (a)-(e) the carrying capacity Beechcraft 1900 aircraft varies from flight to flight. Beechcraft 1900 has 819 cubic feet of capacity.

(ii) Because of the variances in the maximum carrying capacity, these data are not available.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-7. Refer to the Postal Service's response to UPS/USPS-T1-17, redirected from witness Xie, regarding the Eagle and Western networks.

(a) Explain why the Postal Service changed equipment for the Western Network to 727-200s.

(b) Confirm that the change on August 29, 1999, from the use of DC-9s on the Western Network to 727-200s provided a substantial increase in carrying capacity for that network. If confirmed, explain the reason for this expansion of capacity; if not confirmed, explain,

(c) Provide copies of any studies, memoranda, or correspondence relating to the decision to change equipment from DC-9s to 727-200s for the Western Network at this time.

RESPONSE

Postal logistics experts involved in the management of air network operations have provided me with the following information.

(a) The Postal Service did not change the equipment to 727-200s; the winning contractor did. The Postal Service specified the type of equipment needed to meet the network requirements such as the type and number (8) of containers that was to be moved on the network. The aircraft used was the contractor's choice to meet the requirements of the Postal Service's solicitation.

(b) Confirmed. The increase in capacity allowed for greater efficiencies. The old WNET primarily used the A-6 air container, which is usable only on DC9s. Continuing to use A-6's would have constrained the choice of aircraft for the new WNET. A-2 containers, used on the Eagle network, are compatible with most other jet cargo aircraft used in the industry; thus, increasing the supply of aircraft for

bidders to choose from. The switch to the A-2 container allowed for ease of transfer of containers between aircraft, a standardization of container inventory and spare parts, a standardization with daytime network operations, and a wider selection of aircraft with a potential for lower aircraft cost.

A-2 containers are compatible with 727-100s, which are larger but competitively priced with DC9s. In fact, the Postal Service has received offers to provide cargo service with 727s that were cheaper than DC9s. This reflects the fact that the cargo industry favors 727s over DC9s.

The use of 727-200s was the result of the fact that this was the aircraft that the offerors had available. In the end, the Postal Service upgraded its WNET operation without incurring an increase in costs due to aircraft considerations.

The cost and capacity aircraft issue is not all that unusual. Witness Young testified to a similar relationship with regard to purchasing highway cubic capacity in Docket No. R97-1 (Docket No. R97-1, Vol. 35 at 18887).

(c) The Postal Service did not decide to change to a 727-200. See response to parts (a) and (b) above. No such documents are available.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-8. Provide the number of pieces, the number of pounds, the number of pound-miles, and the number of cubic foot-miles for BY1998 by accounting period for the total volume of mail carried on the Eagle Network.

RESPONSE

Piece counts and cubic feet are not available. The requested pound and pound-mile data are attached. Pound-miles reflect actual miles flown by the Eagle and WNET aircraft.

Attachment to Response to UPS/USPS-T19-8

EAGLE/WNET Pounds and Pound-miles by AP for BY1998

	AP	Pounds	Route Pound-Miles
EAGLE	1	15,797,572	23,012,051,510
	2	16,290,610	24,395,792,093
	3	15,478,704	23,421,606,551
	4	13,067,489	20,047,239,062
	5	14,309,664	21,588,127,729
	6	15,942,890	23,884,000,851
	7	16,218,165	24,671,382,234
	8	16,641,692	25,369,381,677
	9	16,411,378	24,916,085,387
	10	15,664,349	23,563,842,671
	11	15,376,470	23,049,154,383
	12	15,815,112	23,707,518,547
	13	15,750,903	23,769,936,609
WNET	1	2,891,579	2,428,605,310
	2	3,001,774	2,470,215,425
	3	2,744,092	2,236,749,916
	4	2,792,738	2,389,360,188
	5	3,254,910	2,640,478,809
	6	3,266,932	2,730,292,295
	7	3,226,342	2,637,696,208
	8	3,274,509	2,722,276,953
	9	3,143,092	2,551,944,855
	10	3,230,843	2,715,228,108
	11	3,873,383	3,493,591,565
	12	3,937,851	3,564,988,498
	13	3,107,044	2,533,110,426

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-9. Provide the number of pieces, number of pounds, number of pound-miles, and number of cubic foot-miles for BY1998 by accounting period for the total volume of Express Mail carried on the Eagle Network.

RESPONSE

The requested data are not available.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-10. Provide the number of pieces, number of pounds, number of pound-miles, and number of cubic foot-miles for BY1998 by accounting period for the total volume of mail carried on the Western Network.

RESPONSE

Piece counts and cubic feet are not available. For pounds and pound miles,

please see the attachment to the response to UPS/USPS-T19-8.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-11. Provide the number of pieces, number of pounds, number of pound-miles, and number of cubic foot-miles for BY1998 by accounting period for the total volume of Express Mail carried on the Western Network.

RESPONSE

The requested data are not available.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T19-12. Describe any circumstances in which a 727-100 or a 727-200 would reach maximum capacity in terms of weight before reaching maximum capacity in terms of volumetrics (cubic feet or other similar measure).

RESPONSE

I am informed that either plane could reach maximum weight under a variety of circumstances. On any particular flight the mail carried could be of sufficient density to cause the plane to meet its maximum weight capacity. Also, under certain climatic conditions, the effective lift capacity of a plane is reduced. This may occur because of a combination of topography and airport altitude such as at Denver. The need to carry additional fuel caused by uncontrollable events such as inclement weather, or expected delays in transit, or diversion to alternate landing sites reduces the lift capacity available for mail. FAA air worthiness directives reduce the potential lift capacity of certain aircraft, because of structural concerns regarding conversion of these aircraft from passenger use to cargo use. Also, the 727-200s with light-weight engines have considerably less lift capacity than those with heavy-weight engines.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS PICKETT
(USPS-T-19) TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-TI9-13. Describe any circumstances in which a 727-100 or a 727-200 would reach maximum capacity in terms of volumetrics (cubic feet or other similar measure) before reaching maximum capacity in terms of weight.

RESPONSE

I am informed that one reason for flights to "cube out" is that the overall load on a particular flight is less dense than normal. This can occur with particular mailings that have low weight per cubic foot or are oddly shaped. Most of the mail on the Eagle and Western networks is containerized. This facilitates the handling of the containers at the outstation airports and the hubs. If unexpected fluctuations occur in the volume of mail to or from certain cities, the containers may not be filled to capacity. This may occur when mail is delayed arriving at a originating facility. Eagle flights originating on the West Coast leave earlier than other flights, creating tighter dispatch deadlines. Also, FAA air worthiness directives can cause some positions on some cargo aircraft to be underutilized or unutilized.

DECLARATION

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

John T. Pickett

Date: 4-12-00

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.

Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–2990 Fax –5402
April 12, 2000