

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 HARAHUSH TO INTERROGATORY OF  
UNITED PARCEL SERVICE REDIRECTED FROM WITNESS BARON  
(UPS/USPS-T12-5)

The United States Postal Service hereby provides the response of witness Harahush to the following interrogatories of United Parcel Service: UPS/USPS-T12-5, filed on March 23, 2000. Interrogatory UPS/USPS-5 was redirected from witness Baron.

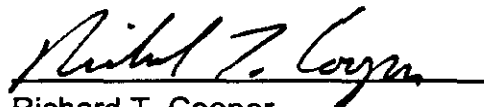
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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April 13, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO  
INTERROGATORY OF UPS REDIRECTED FROM WITNESS BARON

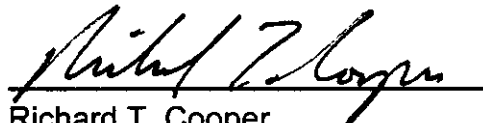
**UPS/USPS-T12-5.** Refer to page 6 of Library Reference USPS-LR-I-157, "Calculating Average Predicted Load Times and Predicted Load Times at Average Volumes."  
Provide the following input files in electronic form used in your LOAD98.CNTL program:  
ALDRAN.CITY.PQTOTAL.PQ1FY98  
ALDRAN.CITY.PQTOTAL.PQ2FY98  
ALDRAN.CITY.PQTOTAL.PQ3FY98 and  
ALDRAN.CITY.PQTOTAL.PQ4FY98.

**RESPONSE:**

The CD-ROM in Library Reference USPS-LR-I-16 includes the file  
ALDRAN.CITY.FY1998.Z.DATA – SAS extension .Z. This file is referred to as the Z-  
File. The Z-File contains data for the entire FY 98, and includes all data that is  
contained in the PQTOTAL files listed above. The variable names are identical. See  
USPS-LR-I-16, pp. 37-40, Layout 008 (Z-File) and Layout 009 (PQTOTAL files) to  
compare the file layouts. If needed, the Postal Quarter can be determined from the  
*first digit of the TESTID.*

**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

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