

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
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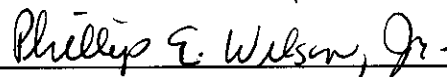
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-12 through 13)
(April 14, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves these interrogatories directed to United States Postal Service: UPS/USPS-12 through 13.

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE

UPS/USPS-12. Refer to Library Reference USPS-LR-I-279, page 9. This document implies that disaggregated PERMIT data was or is available on the Postal Service's San Mateo mainframe computer.

(a) If this inference is not correct, explain in full.

(b) Provide the PERMIT data for all Parcel Post for FY1998 which is transmitted by each district in the form of the "transaction file with VIP codes." Confirm that each record of this data is "aggregated" at the finance number, permit type and number, and VIP code level for each AP. If not confirmed, explain in full.

(c) Confirm that this "disaggregated" data is later summarized by finance number and VIP code and forms the input files used by witness Hunter in the development of the Postal Service's BRPW estimates. If not confirmed, explain in full.

UPS/USPS-13. Refer to Library Reference USPS-LR-I-279, page 19. The library reference refers to "PERMIT raw data obtained from San Mateo."

(a) Does this reference to PERMIT raw data mean that data which reflects individual postage statement information (e.g., not aggregated by facility, AP, permit type and number, etc.) exists on the San Mateo mainframe computer?

(i) If the answer is anything other than an unqualified "yes," explain in full.

(ii) If the answer is yes, provide the PERMIT raw data for all Parcel Post for FY1998.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Phillip E. Wilson, Jr.
Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: April 14, 2000
Philadelphia, Pa.