Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T3-2)

The United States Postal Service hereby provides the responses of witness

Harahush to the following interrogatory of the United Parcel Service: UPS/USPS-T3-2,

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

Richard T. Cooper

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Washington, D.C. 20260-1137
April 14, 2000

UPS/USPS-T3-2. Confirm that the City Carrier System ("CCS") data for City Carrier
Routes (CCR) can be used to estimate the number of parcels by class/subclass of mail.
For example, the CCS data for CCR could be used to determine the number of
Standard A parcels as opposed to Standard B parcels.

(a) If confirmed, provide a table using CCS data for CCR that shows the distribution
of parcels by class and subclass for all stop types. Provide the files and programs that
you use to perform this calculation. If the files have already been provided, cite the
specific references and files to be used.

RESPONSE:

Confirmed.

Library Reference USPS-LR-I-300, City Carrier Volumes FY 1998 contains the table

requested above. The fields in USPS-LR-I-300 can be read using Layout 010 in

Library Reference USPS-LR-I-16, City Carrier Cost System(CCCS) Statistical and

Computer Documentation (Source Code and Data on CD-ROM).

The CD-ROM of Library Reference USPS-LR-I-16 includes the Z-file for FY 1998. The

Z-file is a SAS file that includes all CCS data by stop. The fields of the Z-file are

documented in Layout 008 of USPS-LR-I-16. Using SAS programming, the Z-file can

be utilized to produce any of the estimates specified in (a) above. Modifications to

program ALDRAN.FY1998.PARMLIB(ALD695KP), which is included on the CD-ROM of

USPS-LR-I-16, can be used to create annual estimates. As the ALD695KP program

uses the City PQ Total file (layout 009 of USPS-LR-I-16) as the input files and the Z file

already has the stop type (compare layouts 008 and 009), initial code pertaining to the

formation of stop type is unnecessary when using the Z-file as an input to ALD695KP.
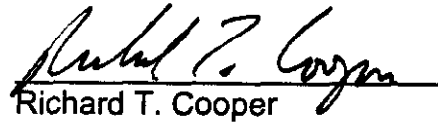
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DECLARATION

I, Thomas W. Harahush, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Thomas W. Harahush

Thomas W. Harahush

Date: 4/14/00

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.

Richard T. Cooper

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