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 PAFFORD TO DATA REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

The United States Postal Service hereby provides the responses of witness

Pafford to the data requests of United Parcel Service during cross-examination on April
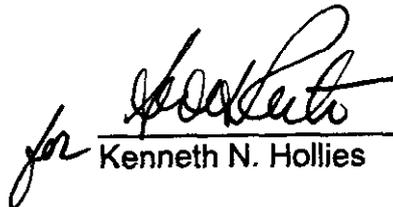
11, 2000.

Each question 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

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–3083 Fax –5402
April 18, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Hearing Question 1, Tr. 2/735, lines 13-19. "I would like to know the number of
Parcel Post pieces that were sampled and that were used to arrive at the estimate of
Parcel Post revenue pieces and weight in what I will call the original CRA that was
presented before the Postal Service revised its Parcel Post revenue pieces and weight
estimates based on the use of the bulk RPW system."

RESPONSE:

The DRPW System indicates that there were 243,437 Standard Mail (B) Parcel Post

pieces of mail entered by the DRPW data collectors during FY 1998.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Hearing Question 2, Tr. 2/743, lines 6-8. "Are there any, is there any permit imprint
Parcel Post data in the Domestic RPW data file in Library Reference I-30?"

RESPONSE:

Yes, as input data, but not in the summary output data sets that supply the final GFY

1998 RPW Adjustment System estimates of revenue, pieces and weight. Specifically,

SAS program H22493.RPW.FY98.CNTL(DRPW) deletes DRPW data not applicable for

RPW Adjustment System roll-up based on two data flags contained in the RPW

Adjustment System rate category directory

(H22493.RPW.FY98.CATEGORY.EOY.DIR): 1) "B" and 2) "X". If the data flag for a

mail category code is "B" or "X" then DRPW data from the input file

(HSI.HQN.PS060D03.FYyyQTn) is NOT outputted to the DRPW data file

(H22493.FYyyn.DRPW.DATA) used for RPW Adjustment System roll-up.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Hearing Question 3, Tr. 2/750, lines 22-23. "Can you tell me why this section of the
code [Appendix G, page 3] was commented out when Library Reference I-30 was
supplied?"

RESPONSE:

This section of the code was not relevant for the PQ 2 GFY 1998 Trial Balance revenue

inputs (Accounting Periods 4, 5, and 6) specified in this Library Reference.   However,

when AP14 GFY 1998 (Government Fiscal Year) data is input into the program, this

section of the code would be uncommented out, and the 'XXX' values replaced with real

numbers.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Hearing Question 4, Tr. 2/755, lines 17-21. "We would like to request all of the input
files that were run on the SAS programs, on the programs that are shown in Library
Reference I-30 as having been run in Quarter 2. We would like those input files for all
quarters for Fiscal Year 1998."

RESPONSE:

USPS-LR-I-302 provides all input data files, SAS and Lotus 1-2-3 spreadsheet

programs for PQ 0, PQ 3, and PQ 5 GFY 1998 RPW Adjustment System processing.

Note that the underlying code is the same as that first provided in USPS-LR-I-30. In

order to expedite the processing, and instead of just providing the relatively minor

additions to the commented out portions of the USPS-LR-I-30 for PQ 0 and PQ 5 code,

the Lotus 1-2-3 and SAS programs contain the full parameterized versions for each

respective time period.

Note: PQ 2 GFY 1998 BRPW inputs, which were erroneously omitted from USPS-LR-I-

249, are have been included in USPS-LR-I-302.

The following is the crosswalk of the PC file names on the CD to the input file names

shown in USPS-LR-I-30:

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Lotus 1-2-3 Spreadsheets for each time period

FACTORS0.WK3
FACTORS0.FM3

FACTORS5.WK3
FACTORS5.FM3

MAN980.WK3   S:\RVC-RPW\QTMODEL\MAN980.WK3
MAN980.FM3

MAN983.WK3   S:\RVC-RPW\QTMODEL\MAN983.WK3
MAN983.FM3

MAN985.WK3   S:\RVC-RPW\QTMODEL\MAN985.WK3
MAN985.FM3

OMAS980.WK3   S:\RVC-RPW\QTMODEL\OMAS980.WK3
OMAS980.FM3

OMAS983.WK3   S:\RVC-RPW\QTMODEL\OMAS983.WK3
OMAS983.FM3

OMAS985.WK3   S:\RVC-RPW\QTMODEL\OMAS985.WK3
OMAS985.FM3

Quarter 0 FY 1998 SAS Programs

PUCODE1.TXT   H22493.RPW.FY98(UCODE23)
PDRPW1.TXT   H22493.RPW.FY98(DRPW)
PBRPW0.TXT   H22493.RPW.FY98(BRPW)
PIRPW0.TXT   H22493.RPW.FY98(IRPW)
PTRBAL1.TXT   H22493.RPW.FY98(TRBAL)
PPROG0.TXT   H22493.RPW.FY98(PROGRAM)

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Quarter 3 FY 1998 SAS Programs

PUCODE3.TXT	H22493.RPW.FY98(UCODE23)
PDRPW3.TXT	H22493.RPW.FY98(DRPW)
PBRPW3.TXT	H22493.RPW.FY98(BRPW)
PIRPW3.TXT	H22493.RPW.FY98(IRPW)
PTRBAL3.TXT	H22493.RPW.FY98(TRBAL)
PPROG3.TXT	H22493.RPW.FY98(PROGRAM)

Quarter 5 FY 1998 SAS Programs

PUCODE4.TXT	H22493.RPW.FY98(UCODE23)
PDRPW4.TXT	H22493.RPW.FY98(DRPW)
PBRPW5.TXT	H22493.RPW.FY98(BRPW)
PIRPW5.TXT	H22493.RPW.FY98(IRPW)
PTRBAL14.TXT	H22493.RPW.FY98(TRBAL)
PPROG5.TXT	H22493.RPW.FY98(PROGRAM)

Quarter 0 FY 1998 Data Files

D2SUM1.TXT	HSISMN.RPW.D2SUM.FY98QT1
UCODE1.TXT	H22493.FY981.UCODE23.DATA
PS1.TXT	HSI.HQN.PS060D03.FY98QT1
HSQRAN1.TXT	HSQRAN.BRPWD01.TRANS.FY1998Q1
CODREG1.TXT	H22493.FY981.CODREG.DATA
DRPW1.TXT	H22493.FY981.DRPW.DATA
MISC0.TXT	H22493.FY980.MISC.DATA
SIRVO1.TXT	H22493.SIRVO.RPWSUM.PQ9801.ADJII.DATA
IRPW0.TXT	H22493.FY980.IRPW.DATA
AUANYN01.BIN	1/ AUANYN.BV910T01.NATL.AP0198
AUANYN02.BIN	1/ AUANYN.BV910T01.NATL.AP0298
AUANYN03.BIN	1/ AUANYN.BV910T01.NATL.AP0398
TRIALB0.TXT	H22493.FY980.TRIALBAL.DATA
BRPW0.TXT	H22493.FY980.BRPW.DATA

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO DATA
REQUESTS OF UNITED PARCEL SERVICE DURING ORAL CROSS-EXAMINATION

Quarter 2 FY 1998 Data Files

      HSQRAN2.TXT   HSQRAN.BRPWD01.TRANS.FY1998Q2

Quarter 3 FY 1998 Data Files

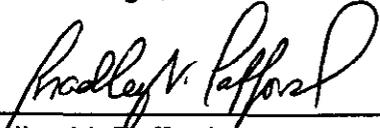|	
D2SUM3.TXT	HSISMN.RPW.D2SUM.FY98QT3
UCODE3.TXT	H22493.FY983.UCODE23.DATA
PS3.TXT	HSI.HQN.PS060D03.FY98QT3
HSQRAN3.TXT	HSQRAN.BRPWD01.TRANS.FY1998Q3
CODREG3.TXT	H22493.FY983.CODREG.DATA
DRPW3.TXT	H22493.FY983.DRPW.DATA
MISC3.TXT	H22493.FY983.MISC.DATA
SIRVO3.TXT	H22493.SIRVO.RPWSUM.PQ9803.ADJII.DATA
IRPW3.TXT	H22493.FY983.IRPW.DATA
AUANYN07.BIN	1/ AUANYN.BV910T01.NATL.AP0798
AUANYN08.BIN	1/ AUANYN.BV910T01.NATL.AP0898
AUANYN09.BIN	1/ AUANYN.BV910T01.NATL.AP0998
TRIALB3.TXT	H22493.FY983.TRIALBAL.DATA
BRPW3.TXT	H22493.FY983.BRPW.DATA

Quarter 5 FY 1998 Data Files

D2SUM4.TXT	HSISMN.RPW.D2SUM.FY98QT4
UCODE4.TXT	H22493.FY984.UCODE23.DATA
PS4.TXT	HSI.HQN.PS060D03.FY98QT4
HSQRAN4.TXT	HSQRAN.BRPWD01.TRANS.FY1998Q4
CODREG4.TXT	H22493.FY984.CODREG.DATA
DRPW4.TXT	H22493.FY984.DRPW.DATA
MISC5.TXT	H22493.FY985.MISC.DATA
SIRVO4.TXT	H22493.SIRVO.RPWSUM.PQ9804.ADJII.DATA
IRPW5.TXT	H22493.FY985.IRPW.DATA
AUANYN14.BIN	1/ AUANYN.BV910T01.NATL.AP1498
TRIALB5.TXT	H22493.FY985.TRIALBAL.DATA
BRPW5.TXT	H22493.FY985.BRPW.DATA

(a)   1/ These files contain data stored as packed decimal. Data files were

downloaded from the mainframe as binary files.

DECLARATION

I, Bradley V. Pafford, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Bradley V. Pafford

Bradley V. Pafford

Date: 4/18/00

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.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
April 18, 2000