

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO UNITED PARCEL  
SERVICE INTERROGATORIES  
(UPS/USPS-T1-72, 73(b) and (e), and 75(b)(i) and (ii))  
(April 25, 2000)

The United States Postal Service hereby objects to United Parcel Service interrogatories UPS/USPS-T1-72, 73(b) and (e), and 75(b)(i) and (ii), directed to witness Xie on April 13, 2000. The interrogatories request information that is variously irrelevant and commercially sensitive, and would be unduly burdensome to produce.

UPS/USPS-T1-72 states:

Refer to the Postal Service's response to UPS/USPS-T1-52. Provide summary data on the movement of containers monitored by the TIMES system. Provide the frequency distributions on the variables in the dataset for PY1998, or alternatively for the currently available period. If possible, also provide information separately by mail class, and/or by highway contract type (Inter-BMC, Intra-BMC, Inter-SCF, Intra-SCF).

UPS/USPS-T1-73 states in pertinent part:

Refer to the Postal Service's response to UPS/USPS-T1-54, which includes a page of a TIMES daily log report.

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- (b) What proportion of entries in the TIMES system record container, pallet, hamper and Express item counts?

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- (e) What proportion of entries in the TIMES system record these percentages [percent of load of preferential mail, the percent of load Priority, or the percent of load bedloaded]?

UPS/USPS-T1-75 states in pertinent part:

- (b) Is it possible to identify the flow of containers related to highway movements on emergency contracts in the TIMES database, or to match TIMES records to another database that records whether a movement is on an emergency contract? If so,
  - (i) For those records in TIMES where data has been entered for the variables Percent of Load of Preferential Mail, Percent of Load Priority, Percent of Load Full, or Percent of Load Bedloaded, provide the frequency distribution and average value of these variables for all records, and for records representing movements made on an emergency contract.
  - (ii) For those records in TIMES where data has been entered for the variables Number of GPC Containers Empty and Full, Number of BMC Containers Empty and Full, Number of Amtrak Containers Empty and Full, Number of Hampers Empty and Full, Number of Pallets (and Pallet Boxes) Empty and Full, and Express Mail Items, provide the frequency distribution and average value of these variables for all records, and for records representing movements made on an emergency contract.

Detailed information on the TIMES system is irrelevant.<sup>1</sup> Postal Service witnesses have not used or relied upon any data from the TIMES system in their analyses. As clearly indicated by Dr. Bradley, he investigated the use of TIMES for a purchased transportation analysis and found that the load information variable in TIMES measured "neither piece volume nor cubic feet of mail" and further was not even a required field. USPS-T-18, at 58. The fact that certain fields in TIMES are not required only emphasizes the irrelevance of the information. For example, an entry of a zero in a field can mean either one of two things, with no way to distinguish between

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<sup>1/</sup> Even though the entirety of UPS interrogatories UPS/USPS-T1-72 through 75 are irrelevant, the Postal Service nonetheless will provide answers in those instances where it is relatively straightforward to do so, and where sensitive information will not be revealed.

them. Either there truly were no containers on that particular truck or the data collector hit "enter" (the equivalent of no entry because the field is not a required one). Thus, whatever data might be gleaned from TIMES sheds no light on the issues in this proceeding.

Moreover to the extent that the above interrogatories request information on container movements, they are objectionable. Information on container flows between specific facilities and OD pairs would allow both competitors and potential transportation contractors to have access to commercially sensitive information which could be used to the detriment of the Postal Service.

Finally, responding to the above interrogatories would be unduly burdensome. Specific queries of the TIMES data system would have to be written and run. The programmers who would be required to perform this work have estimated that it would take two full personweeks (80 hours) to do such, at a cost of \$57.22 per hour, for a total of \$4,577.60. Additional queries would have to be written and run on HCSS in order to respond to UPS/USPS-T1-75(b). Assuming that this effort might take an additional 26 hours at \$57.22 per hour, the grand total of required time to respond would be 106 hours at a total cost of \$6,065.32. This is far too much time and too much money to be spending to investigate a database which does not underlie a single proposal in the case.

For all of the foregoing reasons, the Postal Service objects to answering UPS' questions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Susan M. Duchek

**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.

  
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Susan M. Duchek

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