

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 XIE TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T1-65)

The United States Postal Service hereby provides the response of witness Xie to the following interrogatory of United Parcel Service: UPS/USPS-T1-65, filed on April 11, 2000.

The 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


Kenneth N. Hollies

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

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April 25, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T1-65. Refer to your answer to MPA/USPS-T18-9, in which you provided a table which includes columns labeled Number of Stops, Stop Days, and Stops per Day.

(a) Describe the source of the data in these columns and describe how each variable is related to the others.

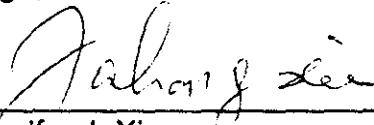
(b) Is there a way to calculate Stops per Day based on the Number of Stops and the Stop Days? If so, how?

RESPONSE.

(a) and (b) The source of the data in these columns is the BY98 highway frame. The 'Number of Routes', 'Number of Trips', and 'Number of Stops' provide the total numbers for contract routes, trips, and stops included in the BY98 highway frame, correspondingly. The 'Stop Day' is developed by taking into account the days in a year for which the trip is scheduled to run. The last column 'Stops per Day' is an average number of stops that a route is scheduled to make per day. It is calculated by dividing the 'Stop Day' by the 'Number of Routes' and by 364, the number of days in a Postal Fiscal year.

DECLARATION

I, Jennifer J. Xie, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.



Jennifer J. Xie

Date: April 25, 2000