

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

Docket No. R2000-1

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

The United States Postal Service hereby provides the revised response of witness Harahush to the following interrogatory of the United Parcel Service: UPS/USPS-T3-2, filed on February 10, 2000. In preparation for his appearance on the stand today, witness Harahush detected an error in his prior response, in which he misidentified a program needed to produce certain city carrier data sought in the interrogatory. The information being provided today will better enable UPS to obtain the requested data. An electronic version of this answer was sent via email to UPS counsel yesterday evening.

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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May 2, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO
INTERROGATORY OF UPS

Revised May 1, 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(ALD695K1), which is included in USPS-LR-I-322, can be used to create annual estimates. As the ALD695K1 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

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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 ALD695K1

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: May 1, 2000

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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