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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER TO INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T5-71(a), 72(a), 81, 83)

The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of United Parcel Service: UPS/USPS-T5-71(a), 72(a), 81, 83, filed on March 23, 2000. While the interrogatories were filed under seal, the responses need not be.

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

Kenneth N. Hollies

UPS/USPS-T5-71. Refer to files BRPW1-13.TXT (known as a group as the CBCIS files).

(a) Describe the process for creating these files (e.g., where did the data come from and describe the methodology for creating them); and

RESPONSE.

a. The BRPW input data are obtained from a special CBCIS-RPW extract process run by the San Mateo MSSC. The CBCIS-RPW extract provides the raw, unadjusted PERMIT System data in useable summary level form as required for input to the BRPW. This is accomplished through a two step process, wherein each of the over 2,000 PERMIT System offices is first polled by its respective district VAX based computer (of which there are 85), and these district sites are then in turn polled by a mainframe computer at the San Mateo MSSC to obtain the necessary VIP Code summary level information required for input to the BRPW. The CBCIS-RPW extract process serves as the intermediary between the PERMIT System and the BRPW. As such, it provides the communications link between the numerous local VAX based PERMIT Systems and the IBM mainframe operating system under which the BRPW is run at the San Mateo MSSC. By managing and summarizing the voluminous daily transactions recorded in the PERMIT System, the CBCIS-RPW extract process provides the summary level data required for input to the BRPW.

UPS/USPS-T5-72. Refer to files BRPW14-26.TXT (known as a group as the CBCISFRM files).

(a) Describe the process for creating these files[.]

RESPONSE.

a. The CBCISFRM file provides an updated listing of PERMIT System offices each AP. It is used in the BRPW to identify a finance number by office name. All PERMIT System sites (identified by finance numbers) with net revenue processed the prior accounting period are listed on the frame file. The file is created every accounting period at the San Mateo MSSC as one of the two PERMIT System interface files input to the BRPW.

UPS/USPS-T5-81. Refer to your response to UPS/USPS-T5-19(a-b), where you state that the "data entry operator" is subject to "on-the-job-evaluations" and "regular Employee Skills Assessments."

- (a) For PERMIT system data entry operators, explain in detail the nature, extent, and frequency of the on-the-job-evaluations.
- (b) For PERMIT system data entry operators, explain in detail the nature, extent, and frequency of the preparation of Employee Skills Assessments.

RESPONSE. This response is based on my understanding of discussions with other postal officials.

a-b. Beginning data entry operators (BMEU clerks) must qualify for their position by successfully completing three components of the Employee Skills Assessment involving: (1) a self-study prerequisite course that includes a math skills and mail classification test, (2) classroom training administered at the Center for Employee Development, and (3) an on-the-job evaluation administered at the local Business Mail Entry unit by a certified OJT instructor. For existing employees, a yearly 24-hour skills enhancement program called BMEU Proficiency is required. This program is designed to enhance their knowledge of Mail Classification.

UPS/USPS-T5-83. Confirm that raw Parcel Post records downloaded from the Permit System and used in the BRPW System are not changed in any way besides changes caused by the programming code in Jobs 1, 2, or 3.

- (a) If you cannot confirm, explain in detail why you cannot confirm and provide a detailed list of all changes that are made to each record.
- (b) If you cannot confirm, explain why each change is necessary.
- (c) If you cannot confirm, provide the following in electronic format:
 - (i) A list of all records that were changed with the value(s) of each variable for each record in their unchanged states.
 - (ii) A list of all records that were changed with the value(s) of each variable for each record in their changed states.
 - (iii) A description next to each record identifying what change was made and why it was necessary to make it.

RESPONSE. It is my understanding that the PERMIT System Parcel Post revenue, piece and weight data are provided unchanged in summary form for input to the BRPW.

DECLARATION

I, Herbert B. Hunter III, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Herbert B. Hunter III

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.

Kenneth N. Hollies

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