

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
TO INTERROGATORIES OF
UNITED PARCEL SERVICE REDIRECTED FROM WITNESS XIE
(UPS/USPS-T1-72, 73(a), (c), (d) and (f), 74, and 75(a) and (c))

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T1-72, 73(a), (c), (d) and (f), 74, and 75(a) and (c), filed on April 13, 2000, and redirected from witness Xie. Objections to interrogatories UPS/USPS-T1-72, 73(b) and (e), and 75(b) were filed on April 25, 2000.

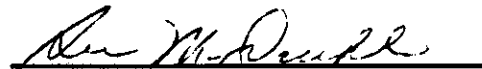
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
May 5, 2000

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE (USPS-T-1)

UPS/USPS-T1-72. 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 or mail sub-class, and/or by highway contract type (Inter-BMC, Intra-BMC, Inter-SCF, Intra-SCF).

RESPONSE

An objection was filed on April 25, 2000. Class and subclass data are not available.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE (USPS-T-1)**

UPS/USPS-T1-73. Refer to the Postal Service's response to UPS/USPS-TI-54, which includes a page of a TIMES daily log report.

a) Confirm that none of the entries on this page recorded the number of containers, pallets, or hampers or the number of Express items.

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

c) It appears that the fields listed in (a) above are not used. Why are these fields in the database if they are not in use? If these fields are occasionally used, for what purpose are they used, and how can such uses rely on partial collection of the data?

d) Confirm that none of the entries on this page recorded the percent of load preferential mail, the percent of load Priority, or the percent of load bedloaded.

e) What proportion of entries in the TIMES system record these percentages?

f) It appears that the fields listed in (d) above are not used. Why are these fields in the database if they are not in use? If these fields are occasionally used, for what purpose are they used, and how can such uses rely on partial collection of the data?

RESPONSE

a) Not confirmed. There are several records with container information greater than zero recorded.

b) An objection was filed on April 25, 2000.

c) In general, these fields are used, but they are not required. The degree to which they are used is determined at the local level. Some facilities make more extensive use of TIMES than others. Local offices use these fields for planning, anticipating workloads, and general logistics management.

d) Not confirmed. It is not possible to distinguish between those records with zero percent entered and those entries for which these data were not recorded.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE (USPS-T-1)

- e) An objection was filed on April 25, 2000.
- f) Zero values can occur in these fields for two reasons: (1) when there is zero percent Preferential, Priority or bedloaded or (2) when data have not been entered. Zero values do not necessarily mean that the fields were not used. These fields are in the database to allow local managers the flexibility to record information as they see fit.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE (USPS-T-1)**

UPS/USPS-T1-74. Refer to the Postal Service's response to UPS/USPS-T1-57. Provide detailed definitions of the following variables and concepts mentioned in your response, and respond to the associated questions.

- a) Define "percent of floor space utilized." Which field or fields in the TIMES database correspond to this concept?
- b) Define the variable "percent of load preferential mail." What sub-classes of mail are considered to be preferential?
- c) Define the variable "percent of load Priority." Is this calculated as percent of the truck capacity, percent of the mail loaded, percent of the load full, or otherwise?
- d) Define the variable "percent of load full."
- e) Define the variable "percent of load bedloaded." Does the term "bedloaded" refer to loose items?
- f) In the above variable definitions, are percentages calculated with respect to volume or to container/hamper/pallet count?
- g) In the above variable definitions, are percentages calculated with respect to the empty space prior to loading, to vehicle capacity, or to the space occupied by the entire mail volume loaded at that stop?
- h) Based on the information recorded in TIMES, how would one calculate the percentage of the truck that is empty?
- i) Does TIMES record information on all mail in the truck, or just mail that is loaded or unloaded at the facility?
- j) Are the variables for code 5500 and code 5466 assigned "yes" or "no" values? What does "not in full compliance with his contractual responsibilities" mean?
- k) Witness Bradley, in his response to UPS/USPS-T18-2 (k), indicates that information from Form 5429 is recorded in TIMES. What information, and in which listed variables, is recorded? If such information is not recorded in the variables listed, identify the variables in which it is recorded, along with any other TIMES variables not listed in your response, and provide definitions for the variables.

RESPONSE

- a. The ratio of occupied (by mail or mail transport equipment (MTE)) floor space to the total floor space of the vehicle expressed in percentage terms.

FULL, or percent of load full.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE (USPS-T-1)

- b. The ratio of floor space occupied by preferential mail (or by MTE containing preferential mail) to the total floor space of the vehicle expressed in percentage terms. Preferential mail includes First-Class Mail and Periodicals.
- c. The ratio of floor space occupied by Priority Mail (or by MTE containing Priority Mail) to the total floor space of the vehicle expressed in percentage terms.
- d. See the response to (a)
- e. The ratio of bedloaded (i.e., loose mail or items on the floor) to the total floor space of the vehicle.
- f. Neither. Percentages are calculated with respect to occupied floor space. TIMES does not collect volume information. Nonzero load data values in TIMES refers to percent of floor space actually occupied by containers/hampers/pallets. When zero values of floor space occupied appear, floor space was either unoccupied by containers/hampers/pallets or no data were recorded.
- g. The question is unclear. The percentages are of occupied floor space to total floor space when the vehicle leaves the facility.
- h. 1 – FULL. This, however, is not the same as TRACS. In TRACS empty MTE is recorded as empty space.
- i. All mail in the truck.
- j. They are assigned "Y" or "N" values. If the value is "Y", a comment is entered. Whenever a contractor is not in compliance with the terms of the

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE (USPS-T-1)

contract. This could include a wide variety of deficiencies (e.g., inadequate equipment, late arrival, a missed stop on a route, an impaired driver, the seal is broken on the truck). A 5466 refers to an irregularity caused by the Postal Service such as mail that is late arriving to the dock.

k. For the record, the response in question was provided by the Postal Service, not witness Bradley. For information on Form 5429 see the revised response to UPS/USPS-T18-7(h). Form 5429 authorizes payment for exceptional service, regardless of contract type. Form 5397 can be used as a source of data for TIMES.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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REDIRECTED FROM WITNESS XIE (USPS-T-1)**

UPS/USPS-T1-75. Refer to the Postal Service's response to UPS/USPS-T1-59.

a) Witness Bradley, in his response to UPS/USPS-T18-2(k), indicates that information from Form 5429 is entered into TIMES. Into what variables in TIMES is that information entered? Does the information entered include whether the movement was under an emergency contract or was for exceptional service?

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 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.

c) Is it possible to identify the flow of containers related to exceptional service highway movements in the TIMES database, or to match TIMES records to another database that records whether a movement is for exceptional service? If so,

i. For those records in TIMES where data has been entered for the variables Percent of Load 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 for exceptional service.

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 for exceptional service.

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RESPONSE

- a. For the record, the response in question was provided by the Postal Service, not witness Bradley. For information on Form 5429 see the revised response to UPS/USPS-T18-7(h). Form 5429 authorizes payment for exceptional service, regardless of contract type. Form 5397 can be used as a source of data for TIMES.
- b. An objection was filed on April 25, 2000.
- c. No.

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
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