

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

MAY 16 4 31 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORY REDIRECTED FROM WITNESS RAYMOND
(UPS/USPS-T13-7d)

The United States Postal Service hereby provides its response to the following interrogatory of the United Parcel Service: UPS/USPS-T13-7d, filed on February 24, 2000. Although initially redirected to witness Stevens, Interrogatory 7d has been redirected to the Postal Service from witness Raymond.

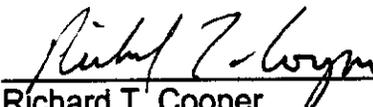
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
May 16, 2000

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO THE
INTERROGATORY OF THE UNITED PARCEL SERVICE

UPS/USPS-T13-7. There are twelve records in USPS-LR-I-163 (the Engineered Standards Database) in which the Activity is "Parcel" and the STS Type is "Driving Time."

(d) Were these data used to apportion any part of driving time to specific products or services or groups of products or services? If so, to what products or services, and how much time was so apportioned? If not, why not?

RESPONSE:

(d) None of the ES data are used to apportion driving time to specific products.

Although some of the tallies in the ES database indicate driving time that can be apportioned to specific classes, no study has been done to determine whether the ES data as currently constituted can be used to disaggregate driving time. More importantly, the ES database cannot identify all products that cause product-specific driving time. The Postal Service uses the results of studies presented in Docket No. R97-1 by witness Nelson. The Nelson studies were designed specifically to determine the part of driving time that should be charged to specific classes and to determine the distribution key, and were adopted by the Commission.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
May 16, 2000