

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

May 18 4 16 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BARON
(UPS/USPS-T12-12 through 17)
(May 18, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby
serves these follow-up interrogatories and requests for production of documents to
United States Postal Service witness Baron: UPS/USPS-T12-12 through 17.

Respectfully submitted,

Phillip E. Wilson, Jr.

John E. McKeever

William J. Pinamont

Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BARON

UPS/USPS-T12-12. Refer to Library Reference USPS-LR-I-310, filed on May 12, 2000, in response to interrogatory ADVO/USPS-T12-11. Provide the data and programs that were used to perform the analyses discussed in that library reference in electronic form, along with the log and output files for all of the programs.

UPS/USPS-T12-13. In your response to ADVO/USPS-T12-11, you indicate that "a draft of a report on this analysis will be completed in approximately two weeks and will be provided as Library Reference USPS-LR-I-310." Is Library Reference USPS-LR-I-310 a draft report? If so, what remains to be completed before the report is no longer considered a draft? When is the final version of the analysis expected to be completed?

UPS/USPS-T12-14. Refer to witness Raymond's response to interrogatory UPS/USPS-T13-10, in which he defines a parcel as "a package that weighs two pounds or more, and/or is larger than a shoe box."

(a) Confirm that the definition of "parcel" in the new regression data set based on the Engineered Standards data (described in Library Reference USPS-LR-I-310, at 6-7) is identical to that provided by witness Raymond. If not confirmed, provide the exact definition of "parcel" in the new regression data.

(b) Is the definition of "parcel" used in the new regression data different from that used in the City Carrier Cost System data used in the previous load time variability analysis?

FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BARON

(c) Is the number of parcels as defined by the City Carrier Cost System substantially less than the number of parcels as defined in the new regression data? If so, provide an explanation as to why the numbers differ. Provide FY1998 parcel volume using both the City Carrier Cost System and the new regression data.

(d) Confirm that the City Carrier Cost system data include parcel volume for Standard (A) mail.

(i) Do the new regression data include parcel volume for pieces less than 2 pounds?

(ii) Does the "parcel" variable in the new regression analysis exclude Standard (A) mail?

(iii) If your answer to (ii) above is anything other than an unqualified "yes," explain why.

UPS/USPS-T12-15. Does the new regression data set include volumes by class/subclass of mail within shape?

UPS/USPS-T12-16. Refer to Library Reference USPS-LR-I-310, Tables 2 and 4.

(a) Provide an explanation as to why marginal load time with respect to parcels is less in Table 2 than in Table 4.

(b) Provide an explanation as to why the elasticity of load time with respect to parcels is greater in Table 2 than in Table 4.

(c) Provide an explanation as to why the elasticity of load time with

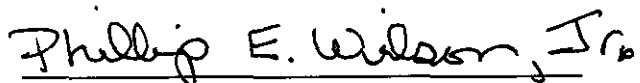
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BARON

respect to parcels decreased from Table 2 to Table 4 at the same time that the marginal load time with respect to parcels increased. Include in your explanation the role that any different definition of parcels between the analysis in Table 2 and that in Table 4 may contribute to this difference.

UPS/USPS-T12-17. Define the term "marginal load time" as used in Tables 2 and 4 on pages 5 and 11 of Library Reference USPS-LR-I-310. Is the term "load time" defined the same in Library Reference USPS-LR-I-130 as in witness Raymond's testimony, USPS-T-13 at 35?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.


Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: May 18, 2000
Philadelphia, Pa.

62763