

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

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS XIE
(UPS/USPS-T1-75)

The United States Postal Service hereby provides its revised response to the following interrogatory of United Parcel Service: UPS/USPS-T1-75, filed on April 25, 2000, and redirected from witness Xie. The original response was filed on May 5, 2000.

The only change is to subpart (a) of the response. The original response had referred to a revised response to UPS/USPS-T18-7(h). The revision refers to the response to UPS/USPS-T18-7(h) and the revised response to UPS/USPS-T18-2(j).

The 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



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May 18, 2000

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE
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 response to UPS/USPS-T18-7(h) and the revised response to UPS/USPS-T18-2(j). 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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", written over a horizontal line.

Susan M. Duchek

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