

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

ERRATA OF UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
UNITED PARCEL SERVICE WITNESS LUCIANI  
(USPS/UPS-T5-5-9)

Interrogatories USPS/UPS-T5-5-9 filed by the Postal Service on June 9, 2000 to United Parcel Service witness Luciani were filed inadvertently and should be replaced with the following interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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June 12, 2000

USPS/UPS-T5-5. Please refer to your testimony at page 13, lines 1-6. You state that

“Ms. Meehan’s distribution of Special Purpose Route costs is based on a study performed by Postal Service Witness Nelson in Docket No. R97-1 (Tr. 21/8553). Based on the data Ms. Meehan has been able to obtain from that study, it is not possible to tell what the distribution key was for each individual type of Special Purpose Route. “

- a) Have you attempted to obtain the data from Witness Nelson’s study, provided in Docket No. R97-1, LR-H-152? If so, have you attempted to tell what the distribution key was for each individual type of Special Purpose Route? If you have made such an attempt, what was the result of this attempt?
- b) Please confirm that, using the data from Witness Nelson’s Special Purpose Route study filed in R97-1, LR-H-152, and a slight modification of the programs supplied with R97-1, LR-H-157, the distribution of Special Purpose Route survey weighted pieces delivered on Exclusive Parcel Post and other types of Special Purpose Routes is as follows:

**TABLE 1. DISTRIBUTION OF PIECES DELIVERED ON SPECIAL PURPOSE ROUTES BY ROUTE TYPE**

MAIL CLASS	EXCLUSIVE PARCEL POST	PARCEL POST COMBINATION	COLLECTION	NON-PARCEL COMBINATION	RELAY ROUTE	OTHERS	TOTAL (R97-1, USPS-T-19, WP 1.8)
FIRST-CLASS MAIL	115,749	275,119	270,915	46,388	447,714	846,886	2,002,771
PRIORITY	3,140,706	5,039,412	2,983,331	91,945	1,472,309	852,491	13,580,194
EXPRESS	85,397	753,895	1,006,060	205,508	287,461	383,231	2,721,552
MAILGRAM	-	14,592	22,324	-	-	-	36,916
PERIODICALS	282,824	755,618	432,184	6,508	20,974	115,198	1,613,306
STANDARD (A) SINGLE PIECE	70,434	438,011	152,693	-	22,997	108,547	792,682
REMAINING STANDARD (A)	254,992	1,210,665	533,052	32,541	117,710	266,168	2,415,128
STANDARD (B)							
PARCEL POST ZONE RATE	988,476	4,374,047	737,703	71,589	864,603	264,554	7,300,972
BOUND PRINTED MATTER	1,592,969	2,530,623	522,174	52,065	371,010	92,187	5,161,028
SPECIAL STANDARD	1,189,216	975,727	499,583	32,541	83,182	45,597	2,825,846
LIBRARY	231,179	529,307	212,481	19,524	107,973	56,354	1,156,818
TOTAL STANDARD (B)	4,001,840	8,409,704	1,971,941	175,719	1,426,768	458,692	16,444,664
INTERNATIONAL	182,562	385,028	36,698	164,202	517,426	26,326	1,312,240
SPECIAL DELIVERY	1,214	4,730	24,229	-	-	9,581	39,754
TOTAL	8,338,184	17,065,948	7,579,291	595,307	4,313,359	3,067,119	40,959,207

If you do not confirm, please explain fully why not, and provide corrected table entries.

- c) Please confirm that for each of the route type categories shown in the columns of Table 1, the distribution of pieces is not an appropriate distribution key for the costs in that category. If you do not confirm, please explain fully.

USPS/UPS-T5-6. Please refer to page 13 of your testimony, where you state that Exclusive Parcel Post route "costs may be treated as a Product Specific cost under the Postal Service's costing method, or as a specific fixed cost under the Commission's costing method." Assuming the information provided in Table 1 in interrogatory USPS/UPS-T5-5 accurately represents the distribution of Special Purpose Route survey weighted pieces delivered on Exclusive Parcel Post and other types of Special Purpose Routes, based on that Table:

- a) Would you conclude that the name of the route type is indicative of the type of mail delivered on the route? Please explain fully.
- b) Would you expect mail to be delivered on Collection or Relay routes? Please explain fully.
- c) Would you conclude that the mail delivered on Exclusive Parcel Post Routes is entirely Parcel Post? Please explain fully.

USPS/UPS T5-7. Please refer to page 3 of your testimony. Have you calculated the impact of the cost and revenue changes recommended for Parcel Post and Priority Mail on the other mail categories? If so, what are the cost and revenue estimates for each?

USPS/UPS T5-8. Please refer to pages 14-15 of your testimony.

- a) Does your statement at page 14, lines 9-10: "This is inconsistent and clearly wrong." refer to wrong revenue or wrong volume, or both? Please explain.
- b) Please confirm that witness Plunkett's test year Alaska volume estimate is based on the FY 1998 proportion of Intra-BMC Non-Alaska Bypass to Total Intra-BMC volumes, as shown in his Attachment D, cells E20 and G20. If you do not confirm, please detail your understanding of his calculation.
- c) Please confirm that witness Plunkett's test year estimate of OMAS volumes is based on a residual calculation, as shown in Attachment D, cells E24 and G24. If you do confirm, please detail your understanding of his calculation.

USPS/UPS T5-9. Please provide missing citations for all data, including pastings of new data, in your Workpapers.

## 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 cursive script, appearing to read "Scott L. Reiter", is written above a horizontal line.

Scott L. Reiter

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