

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  
UPS/USPS-T5-58(b-c) Redirected From Witness Hunter  
And UPS/USPS-6

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service:

UPS/USPS-T5-58(b-c), filed on March 23, 2000, and UPS/USPS-6 filed on April 5, 2000.

These responses were compelled via Presiding Officer's Ruling R2000-1/72 (May 30, 2000).

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.

Chief Counsel, Ratemaking

Kenneth N. Hollies by EHS  
Kenneth N. Hollies

**COMPELLED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-6.**

- (a) Provide all programs, documents, analyses and any other information used to aggregate each postage statement transaction for each record provided as part of LR-I-194. If no such programs, documents, analyses, or other information exists, explain in detail why it does not exist. If such information existed at one time but no longer exists, explain in detail why it no longer exists and why it was destroyed, lost, or not kept.
- (b) Provide all documents, programs, analyses, and any other information used in correcting Permit System and manual data before it is aggregated and sent to Mr. Hunter. If such information existed at one time but no longer exists, explain in detail why it no longer exists and why it was destroyed, lost, or not kept.
- (c) Provide all documents, programs, analyses, and any other information used in correcting Permit System and manual data after it is aggregated and sent to Mr. Hunter but before Mr. Hunter performs the iterative "correction" process he described in the technical conference held on March 20, 2000
- (d) Provide all documents, programs, analyses, and any other information (including, if available, SAS log files of LR-I-194 SAS programs JOB1 JOB2 and JOB3) resulting from the iterative "correction" process Mr. Hunter described in the technical conference held on March 20, 2000.

**PRESIDING OFFICER'S RULING R2000-1/72** required the Postal Service to respond to this interrogatory in terms applicable to a Postal Service's capability of providing this information as available from a contractor.

**RESPONSE:**

(a-d) See Library Reference USPS-LR-I-401.

**COMPELLED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T5-58.** Refer to USPS-LR-I-194 and USPS-LR-I-25.

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(b) Provide in electronic format detailed files that make up each input record provided in LR-I-194. The level of detail that should be provided should be down to the postage statements for that record with information that is likely to identify a particular mailer masked. The format for these files should be exactly the same as the input records provided in LR-I-194, but at the postage statement level (i.e., the electronic files should contain the same inputs as records provided in LR-I-194, but not aggregated). If these files cannot be provided, explain in detail why.

(c) Provide a random sample of postage statements that come from the Permit System and that underlie the records provided in LR-I-194. The sample size should correspond to necessary statistical requirements for sampling population sizes similar to the FY 1998 Permit System postage statements.

**PRESIDING OFFICER'S RULING R2000-1/72** required the Postal Service to respond to this interrogatory in terms applicable to a Postal Service's capability of providing this information as available from a contractor.

**RESPONSE:**

(b-c) See Library Reference USPS-LR-I-401.

**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.

Kenneth N. Hollies by EJR  
Kenneth N. Hollies

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