

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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
UNITED PARCEL SERVICE WITNESS NEELS
(USPS/UPS-T1-45-47)

Pursuant to rules 25 through 27 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to United Parcel Service witness Neels:

USPS/UPS-T1-45-47.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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June 21, 2000

USPS/UPS-T1-45. Please refer to your response to USPS/UPS-T1-9(c).

a. In your response, you state, "The other logical place where the commingled data could have appeared - namely, the SPBS TPH/F data series – held positive values. I assumed that this represented the commingled manual parcel and SPBS data, and that still seems to be the most likely situation."

You further state, "I cannot exclude the possibility that the numbers shown as SPBS TPH/F for periods 294 through 295 in site #6 actually represent something completely different..."

- i. Can you "exclude the possibility" that "the numbers shown as SPBS TPH/F" for site #6 represent the machine counts of pieces handled on the SPBS equipment at that site? If so, on what basis?
- ii. If the "numbers shown as SPBS TPH/F" for site #6 represent the machine counts of pieces handled on the SPBS equipment at that site, would that situation be consistent with MODS TPH and TPF recording procedures for mechanized and automated sorting operations, as you understand them? If not, please explain your understanding of MODS TPH and TPF recording procedures for mechanized and automated sorting operations.
- iii. If the "numbers shown as SPBS TPH/F" for site #6 represent the machine counts of pieces handled on the SPBS equipment at that site, would the SPBS TPH/F data for that site be erroneous? Please explain any affirmative answer.

- iv. Can you “exclude the possibility” that, in the periods where zero manual parcel TPH were recorded at site #6, the site simply did not report manual parcel piece handlings anywhere? If so, on what basis?
- b. In your response, you state, “if all parcels were processed together in the SPBS operation, as the TPH data suggests, they would all by definition be SPBS parcels, and it would not make sense to talk of ‘commingling’ manual parcels and SPBS parcels in SPBS operations.” Does this statement imply that you believe that Dr. Bozzo “talk[ed] of ‘commingling’ manual parcels and SPBS parcels in SPBS operations”? If so, please reconcile your belief with Dr. Bozzo’s response to UPS counsel at Tr. 15/6431, lines 2-5, in which he states that the site, “had handled manual and SPBS parcels together up to a point *prior to separating them according to the mail processing technology that was used to sort them*” [emphasis added]. If not, what is the meaning of this statement?

USPS/UPS-T1-46. Please refer to your response to USPS/UPS-T1-10(b). You indicate that the results reported in the Table Prepared in Response to USPS/UPS-T1-10(b) “suggest that the MODS data series for SPBS and Manual Parcels exhibit gross data errors that exceed acceptable levels, as defined by Dr. Bozzo himself in USPS-T-1 5.”

- a. Please confirm that the error rate per your calculations reported in the Table Prepared in Response to USPS/UPS-T1-10(b) for SPBS is 8.45 percent. If you do not confirm, please explain.

- b. Please confirm that the error rate per Dr. Bozzo's calculations reported in the Table Prepared in Response to USPS/UPS-T1-10(b) for SPBS is 1.38 percent. If you do not confirm, please explain.
- c. Please confirm that the error rates for SPBS both in parts (a) and (b) are within the range of error rates for "routine data," as the term is used in USPS-T-15 at page 106, line 4. If you do not confirm, please explain.
- d. Please confirm that, in the statement from your response to USPS/UPS-T1-10(b) quoted above, you meant to refer to the manual Priority Mail series, not SPBS. If you do not confirm, please explain.

USPS/UPS-T1-47. Please refer to your response to USPS/UPS-T1-11(b), the data you provided in UPS-LR-3, and the file volume.xls, provided in your workpapers, UPS-Neels-WP-1.

- a. Please confirm that the volume.xls file contains data for FY1979 and FY1980. If you do not confirm, please explain fully.
- b. Please confirm that you excluded the FY1979 and FY1980 data in the volume.xls file from the aggregate time series analysis you present in UPS-T-1. If you do not confirm, please explain fully.
- c. With respect to your response to USPS/UPS-T1-11(b), did you exclude the FY1979 and FY1980 data on *a priori* grounds, on the basis of some preliminary analysis you performed, or for some other reason(s)?

- d. If your response to part (b) indicates that you excluded the FY1979 and FY1980 data on *a priori* grounds, please state fully the *a priori* grounds that led you to exclude the FY1979 and FY1980 data.
- e. If your response to part (b) indicates that you excluded the FY1979 and FY1980 data on the basis of some preliminary analysis you performed, please describe fully and provide the analysis, and indicate in detail how the results of the analysis led you to exclude the FY1979 and FY1980 data.
- f. If your response to part (b) indicates that you excluded the FY1979 and FY1980 data for some other reason(s), please state fully all reason(s).

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", is written over a solid horizontal line.

Susan M. Duchek

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