

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

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**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY  
(UPS/USPS-T13-25 through 30)**

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(August 25, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Bradley (UPS/USPS-T13-25 through 30).

Respectfully submitted,

  
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Of Counsel.

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**UPS/USPS-T13-25.** In reference to your response to FGFS/USPS-T13-25, please provide the HCRID number for each contract in your sample of highway contracts that does not specify round-trip transportation, where "round-trip" denotes a route that begins and ends at the same location. If this information is not available, please provide your best estimate of the proportion of contracts in each category (Box Route, Intra-City, etc.) that are not round-trip contracts.

**UPS/USPS-T13-26.** In reference to your response to UPS/USPS-T13-10, please indicate what statistical test or tests are appropriate to apply in distinguishing the variabilities of different pools of contracts.

- (a) Did you apply any of these tests in connection with your adjustments for within account heterogeneity, as described at pages 35 to 41 of your direct testimony? Please provide a complete description of all such tests, and your conclusions concerning the most appropriate segregation of contracts for each pool of contracts.

**UPS/USPS-T13-27.** Referring to pages 33 and 34 of your testimony, please provide responses to the following:

- (a) Identify the HCRID number for each of the 77 annual contracts (as distinguished from the 611 per-trip contracts);
- (b) Provide a complete summary of the terms and conditions under which the Postal Service contracts for plant-load transportation, including any differences in per-trip vs. annual contract specifications;
- (c) Explain why per-trip plant-load contracts are not inherently 100% volume variable;

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- (d) Provide the results of any statistical tests you have run to determine the relative variability of per-trip vs. annual plant load contracts, including a description of all such tests, test results, and your conclusions.

**UPS/USPS-T13-29.** Referring to Exhibit USPS-13B of your testimony, please explain whether it is more or less appropriate to use annual cubic foot miles instead of HCSS accrued costs in weighting the subaccount split variabilities.

**UPS/USPS-T13-30.** Referring to pages 5 and 6 of your testimony, and Exhibit USPS-13B, please explain why it would not be preferable to evaluate overall Inter-SCF variability at the overall, mean values of the data for both vans and trailers together instead of using separate mean values for evaluating variability for each of the two regression equations.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
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Albert P. Parker, II

Dated: August 25, 1997  
Philadelphia, PA