

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

THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY
(UPS/USPS-T14-23 through 30)

(August 29, 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-T14-23 through 30).

Respectfully submitted,



John E. McKeever
Albert P. Parker, II
Stephanie Richman
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

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UPS/USPS-T14-23. Please refer to Workpaper WP-1, and to the program SPBSP.TXT in LR-H-149. At the bottom of page 1 of SPBSP, the data set OPSTAGE is read in and a variable is set: "HRS=HSPPRIO." In Workpaper WP-1, the output (LOG file) of program SPBSP is listed on page WP1-2. However, line 66 of the LOG file references the same data step and sets: "HRS=HSPBPRIO." Thus, these two lines, one from the SAS file and one from the LOG file, are inconsistent. The SAS program contained in the library reference thus does not appear to be the program that created the LOG file in the workpaper. Please explain the discrepancy and identify which program created the results contained in Bradley T-14.

UPS/USPS-T14-24. Please confirm that the LOG files and related documents in all other workpapers are consistent with the SAS files contained in LR-H-148 and LR-H-149. If this is not the case, please provide the consistent pairs of SAS and LOG files that were used in the results contained in Bradley T-14.

UPS/USPS-T14-25. Please provide the SAS LOG for programs VMALLSC.TXT, VVMBMCSC.TXT, VVMDIRSC.TXT and VVMREGSC.TXT, and confirm the following:

- (a) VVMDIRSC.TXT is the SAS program that "scrubs" the MODS direct activities data.
- (b) Data set VVDA1.DAT is read in to VVMDIRSC.TXT.
- (c) VMALLSC.TXT is the SAS program that "scrubs" the MODS allied activities data.

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- (d) Data sets `VVDA2.DAT` and `VVDA1.DAT` are read in to `VVMALLSC.TXT`.
- (e) `VVBMCSCTXT` is the SAS program that "scrubs" the BMC allied and direct data.
- (f) Data set `BMC.DAT` is read in to `VVBMCSCTXT`.
- (g) `VVMREGSCTXT` is the SAS program that "scrubs" the registry (and remote encoding) data.
- (h) Data set `RGDATA.DAT` is read in to program `VVMREGSCTXT`.

If you cannot confirm, please provide explicit references to the SAS programs and the particular data scrubbed as well as the data sets that are read in by each of the above referenced programs.

UPS/USPS-T14-26. Please refer to page 3 of `VVMDIRSCTXT`. In the comment section, threshold levels of TPH per site are set. Please confirm that TPH thresholds vary by activity only, not by site or time period. If confirmed, please discuss:

- (a) how the particular thresholds were chosen;
- (b) any consideration given to thresholds that varied across sites (i.e., was site size considered in establishing thresholds, or was percentage of site capacity considered as a threshold measure?).

UPS/USPS-T14-27. Please refer to `VVMDIRSCTXT`, and to the data scrub process in general.

- (a) Beginning with Part III on page 4 of `VVMDIRSCTXT`, please confirm that a continuity scrub is performed first, followed by the one percent tails scrub, and then another continuity scrub.

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- (b) If confirmed, discuss to what extent the data are affected by performing the first continuity scrub prior to the one percent tail scrub (i.e., consider, for example, an "outlier" that is eliminated from the data due to the continuity scrub; the distribution of the remaining data may be affected. When the subsequent one percent scrub is performed, data points that were not outliers prior to the continuity scrub might become outliers due to the change in data distribution and could be eliminated, thereby leaving gaps in previously continuous strings of data such that a site could be completely eliminated due to the order of scrubbing.).

UPS/USPS-T14-28. Please refer to pages 3 and 7 of **VVMREGSC.TXT**.

- (a) Please confirm that the continuity scrub checks for 104 consecutive observations.
- (b) Please confirm that LR-H-148, REGVOL.DAT, the registry activity data, contains just 32 observations, and if so, confirm that all 32 observations are used in estimation of volume variability and explain the use of the SAS program **VVMREGSC.TXT**.

UPS/USPS-T14-29. Please confirm that **VMBMCSC.TXT** indicates that BMC activities are checked for continuity of 26 consecutive observations per site, and similarly for **VVMALLSC.TXT**. Please indicate the section of T-14 that discusses the choice of 26, instead of 39, consecutive data points for each of these activities. If you cannot indicate a section in your testimony, please explain the inconsistency between your testimony and back-up (SAS code).


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UPS/USPS-T14-30. Please refer to VMALLSC.TXT.

- (a) Please discuss the omission of a scrub for the one percent tails that is performed in each of the other data scrub programs.
- (b) Please indicate the section of T-14 that discusses why scrubs for outliers are not necessary or not performed for these activities. If you cannot indicate a section in your testimony, please explain the inconsistency or provide a corrected version of VMALLSC.TXT.

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.



Albert P. Parker, II

Dated: August 29, 1997
Philadelphia, PA