

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
DOCKET NO. R97-1

**FIFTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY  
(UPS/USPS-T14-35 through 40)**

(September 8, 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-T14-35 through 40).

Respectfully submitted,



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Of Counsel.

**UNITED PARCEL SERVICE FIFTH SET OF INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS BRADLEY**

**UPS/USPS-T14-35.** Please refer to LR-H-148. Explain the use of the data sets VVMPN and VVMPO, and explain how they are used in producing the results in your testimony.

**UPS/USPS-T14-36.** Please refer to LR-H-149, BCS.TXT, page 2. Please confirm that the data step approximately one third of the way down the page, "DATA OPER; SET OPER;" does not perform any operation in this program. If confirmed, please explain the inclusion of this data step and address whether this data step was used for an analysis not provided in your testimony, or if it is simply extraneous. If not confirmed, please explain what operation the data step performs.

**UPS/USPS-T14-37.** Please refer to LR-H-149, BCS.TXT, page 4. Please confirm that the fifth line from the bottom, "DATA OPER; SET OPER;" does not perform any operation in this program. If confirmed, please explain the inclusion of this data step and address whether this data step was used for an analysis not provided in your testimony, or if it is simply extraneous. If not confirmed, please explain what operation the data step performs.

**UPS/USPS-T14-38.** Please confirm that there are additional programs in LR-H-148 and LR-H-149 that include code that may be specific to mainframe processing or are left over from data analyses that were performed but not included in your testimony. If confirmed, please indicate the sections in each program in LR-H-148

and LR-H-149 that are left over from previous programming runs that were discarded, and explain why the results of these runs were not included in your testimony.

**UPS/USPS-T14-39.** Please refer to LR-H-148, VVMALLSC.TXT. Please confirm that the numbers in the right-hand column, beginning with 00006310, are extraneous and used only for mainframe runs, and that the JCL that would indicate precisely which data set is read has not been provided.

**UPS/USPS-T14-40.** Please refer to page 76 of your testimony. Please provide the SAS, LIS, and LOG files that produced the results in your testimony. Also, please provide the results and SAS, LIS, and LOG files for other MODS activities not provided in your testimony, including manual parcel sorting, manual priority mail sorting, SPBS priority mail sorting, SPBS non-priority mail sorting, cancellation and mail prep, opening-pref mail, opening bulk business mail, pouching, platform, remote encoding, registry, and all BMC activities.

### **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.

A handwritten signature in black ink that reads "Albert P. Parker, II". The signature is written in a cursive style with a horizontal line under the name.

Albert P. Parker, II

Dated: September 8, 1997  
Philadelphia, PA