

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
ALEXANDROVICH TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T5-2)

The United States Postal Service hereby provides the response of witness Alexandrovich to the following interrogatory of United Parcel Service: UPS/USPS-T5-2, filed on August 27, 1997.

The Postal Service and UPS have been engaged in discussions concerning the provision of information requested in the interrogatory. At this time, the Postal Service and UPS have agreed upon the attached response, which is a listing of 20 different items from each of the over 100 Alaskan highway surface contracts and the Alaskan water contracts as of quarter 4 of FY 1996. There are approximately 6 additional Alaskan contracts where the requested information is still due to be furnished. That information will be furnished as soon as it is available. UPS reserves its right, upon review of the attached response, to renew the original request in the interrogatory for the hard copy contracts. The Postal Service reserves its right, upon renewal of the request for the hard copy contracts, to object.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
September 10, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
ALEXANDROVICH TO INTERROGATORY OF UNITED PARCEL SERVICE**

UPS/USPS-T5-2. Please refer to workpaper B-14, W/S 14.0.6. Provide copies of all current contracts relating to Alaskan Highway surface transportation, including but not limited to contracts with SEALAND, TOTE, LYNDEN, MONTAGUE and SKYLINE.

UPS/USPS-T5-2 Response:

Please see the Attachment to this response.

HCR ID	Renewal	Acct	Area	FY	Rte Type	Rte Part	Miles Annual	Box Cl	Annual Cost	Fuel Cost	Driver Wages	CP1 Cost	Type	Veh. grp	No. of Vehicles	Vehicle Cubes	Sum of Trip Lengths	No. of Trips	Avg. Trip Length
99502	Y	53124	12	96	A		164889	0	\$458,259	\$110,749	\$108,793	\$35,138	1	9	1	2400	1580	2	790
99511	Y	53124	12	96	A		226079	0	\$219,177	\$47,120	\$97,295	\$35,532	1	10	2	2700	1465	4	366.25
99530	Y	53121	12	96	A		128801	0	\$198,690	\$36,297	\$23,784	\$38,609	1	10	2	2700	953.4	6	158.9
99532	Y	53121	12	96	A		78132	0	\$94,123	\$31,921	\$17,898	\$20,141	1	9	3	2400	515.6	4	128.9
99533	Y	53121	12	96	A		150592	0	\$24,513	\$91,321	\$91,201	\$31,324	1	10	3	2700	309.2	8	39.87
99534	Y	53121	12	96	A		191762	0	\$246,409	\$99,364	\$65,489	\$41,113	1	10	1	2700	1265.2	4	316.37
99535	Y	53121	12	96	A		163985	0	\$243,086	\$34,830	\$129,148	\$40,049	1	10	2	2700	910.4	4	227.6
99536	Y	53121	12	96	A		40579	0	\$33,957	\$31,002	\$0	\$9,549	1	1	1	60	222.2	4	55.55
99560	Y	53121	12	96	A		42551	159	\$51,605	\$45,440	\$0	\$6,165	1	2	1	160	200.8	4	70.2
99562	Y	53121	12	96	A		3800	0	\$35,025	\$15,834	\$0	\$495	1	2	1	240	50	4	12.5
99563	Y	53121	12	96	A		12239	43	\$17,902	\$16,909	\$0	\$1,093	1	1	1	90	82	2	41
99567	Y	53121	12	96	A		30762	332	\$37,654	\$34,014	\$0	\$3,640	1	1	1	60	203	4	50.75
99571	Y	53124	12	96	A		12002	0	\$15,382	\$14,220	\$0	\$1,162	1	1	1	90	39.6	4	19.8
99572	Y	53121	12	96	A		69644	118	\$63,580	\$57,404	\$0	\$6,176	1	1	1	90	268.4	2	134.2
99574	Y	53121	12	96	A		53765	153	\$43,000	\$37,920	\$0	\$5,080	1	1	1	60	177.4	2	88.7
99578	Y	53121	12	96	A		3819	308	\$23,579	\$23,187	\$0	\$392	1	1	1	40	12.6	2	6.3
99579	Y	53121	12	96	A		8153	320	\$25,196	\$22,992	\$0	\$2,204	1	1	1	60	26.9	2	13.45
99580	Y	53121	12	96	A		4576	315	\$26,144	\$25,610	\$0	\$534	1	1	1	60	15.1	2	7.55
99583	Y	53121	12	96	A		7880	404	\$30,776	\$26,751	\$0	\$754	1	1	1	60	26	2	13
99585	Y	53121	12	96	A		10547	403	\$33,795	\$32,300	\$0	\$1,495	1	1	1	30	34.8	2	17.4
995A	Y	53121	12	96	A		27555	0	\$103,882	\$70,894	\$25,197	\$7,990	1	10	1	2700	118	12	9.76
995BA	Y	53121	12	96	A		109773	0	\$36,883	\$38,135	\$243,700	\$23,912	1	6	4	900	155.6	24	6.22
995CA	Y	53121	12	96	A		37309	0	\$38,196	\$0	\$29,422	\$3,250	1	3	1	450	47.2	4	11.8
995CD	Y	53121	12	96	A		15914	0	\$105,046	\$76,584	\$16,442	\$12,019	1	10	1	2700	153.4	14	10.88
995DA	Y	53121	12	96	A		11101	0	\$70,606	\$43,737	\$12,653	\$3,832	1	10	1	2700	48.8	10	4.78
995EA	Y	53121	12	96	A		17369	0	\$69,269	\$26,936	\$16,331	\$5,033	1	10	1	2700	75.8	10	7.48
995FA	Y	53121	12	96	A		15129	0	\$82,819	\$56,576	\$5,687	\$2,112	1	10	1	2700	65.2	12	5.36
995GA	Y	53121	12	96	A		4546	0	\$42,070	\$9,931	\$24,828	\$2,112	1	5	1	2700	15	6	2.5
995HA	Y	53121	12	96	A		21547	0	\$72,773	\$7,674	\$47,205	\$5,395	1	10	1	2700	93.8	10	9.28
99601	Y	53183	12	96	A		2755	0	\$13,475	\$11,973	\$0	\$1,502	1	1	1	40	10.4	2	5.2
99602	Y	53124	12	96	A		4634	0	\$15,936	\$13,845	\$0	\$2,091	1	1	1	40	34	2	17
99660	Y	53121	12	96	A		15063	216	\$44,742	\$42,310	\$0	\$2,432	1	1	1	50	49.7	2	24.85
99661	Y	53121	12	96	A		22670	443	\$41,936	\$39,514	\$0	\$2,322	1	1	1	90	74.8	2	37.4
99662	Y	53124	12	96	A		11199	0	\$22,137	\$20,555	\$0	\$1,581	1	2	1	120	72.8	2	36.4
99663	Y	53121	12	96	A		17523	0	\$17,443	\$15,762	\$0	\$1,681	1	2	1	160	63.2	4	15.8
99664	Y	53121	12	96	A		36338	73	\$44,125	\$40,456	\$0	\$3,669	1	1	1	60	119.9	2	59.95
99666	Y	53121	12	96	A		25458	314	\$39,527	\$30,870	\$0	\$3,350	1	1	1	120	84	2	42
99667	Y	53121	12	96	A		4849	0	\$14,075	\$13,483	\$0	\$592	1	2	1	240	16	2	8
99670	Y	53121	12	96	A		27579	13	\$26,666	\$22,394	\$0	\$4,272	1	1	1	60	91	2	45.5
99671	Y	53121	12	96	A		13517	351	\$35,000	\$33,539	\$0	\$1,461	1	1	1	40	44.6	2	22.3
99672	Y	53121	12	96	A		46855	238	\$55,857	\$5,732	\$39,271	\$3,343	1	1	1	60	154.6	2	77.3
99673	Y	53121	12	96	A		7971	325	\$19,193	\$17,725	\$0	\$873	1	1	1	30	26.3	2	13.15
99674	Y	53121	12	96	A		4364	0	\$8,996	\$8,460	\$0	\$536	1	1	1	160	28.8	4	7.2
99675	Y	53121	12	96	A		15487	248	\$25,824	\$23,390	\$0	\$1,840	1	1	1	40	51.1	2	25.55
99676	Y	53124	12	96	A		16636	0	\$33,186	\$29,832	\$0	\$3,354	1	2	1	240	60	4	15

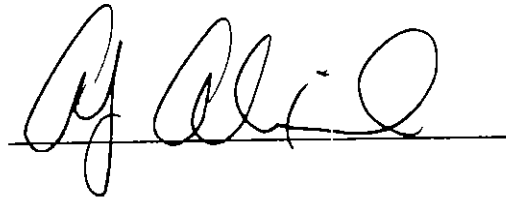
HCR ID	Renewal	Acct	Area	FY	Ris Type	Ris Part	Miles Annual	Box Ct	Annual Cost	Fuel Cost	Driver Wages	CPJ Cost	Type	Veh. Grp.	No. of Vehicles	Vehicle Cubes	Sum of Trip Lengths	No. of Trips	Avg. Trip Length
99676	Y	53124	12	96	2	B	16200	0	\$26,273	\$23,017	\$0	\$3,256	1	2	1	240	27	2	13.5
99677	Y	53121	12	96	4	A	9729	163	\$26,635	\$25,660	\$0	\$976	1	2	1	120	32.1	2	16.05
99678	Y	53121	12	96	2	A	2766	0	\$5,958	\$5,653	\$0	\$306	1	2	1	100	11	1	47.3
99679	Y	53121	12	96	4	A	28670	344	\$29,268	\$26,508	\$0	\$1,516	1	1	1	60	94.6	2	50.25
99681	Y	53121	12	96	4	A	30459	222	\$45,001	\$2,586	\$36,161	\$3,776	1	1	1	80	100.5	2	61.8
99682	Y	53121	12	96	4	A	24852	315	\$40,486	\$36,669	\$0	\$3,817	1	2	1	240	14.6	2	7.3
99683	Y	53121	12	96	4	A	13366	397	\$39,399	\$37,325	\$0	\$2,074	1	1	1	60	44.2	2	22.1
99684	Y	53121	12	96	4	A	16487	395	\$32,366	\$29,629	\$0	\$2,738	1	1	1	50	54.4	2	27.2
99685	Y	53121	12	96	2	A	9880	0	\$13,395	\$12,180	\$0	\$1,215	2	2	1	240	65.2	4	16.3
99686	Y	53121	12	96	4	A	7880	292	\$21,154	\$20,147	\$0	\$1,007	1	1	1	60	26	4	13
99687	Y	53121	12	96	4	A	5849	352	\$24,418	\$23,326	\$0	\$1,092	1	1	1	50	19.3	2	9.85
99688	Y	53121	12	96	2	A	54152	0	\$89,957	\$78,520	\$0	\$11,438	1	1	1	500	181.2	2	90.6
99689	Y	53121	12	96	4	A	42097	261	\$41,350	\$34,965	\$0	\$6,385	1	1	1	160	138.9	2	69.45
996AD	Y	53121	12	96	2	A	10457	0	\$6,895	\$5,111	\$0	\$543	1	1	1	1000	16	2	8
996AD	Y	53121	12	96	2	B	10457	0	\$48,922	\$5,309	\$32,795	\$2,899	1	1	1	1000	45.6	8	5.7
996BD	Y	53121	12	96	2	A	8244	0	\$30,422	\$27,290	\$0	\$3,132	1	2	1	90	27.2	4	6.8
996CD	Y	53121	12	96	2	A	4243	0	\$26,798	\$24,522	\$0	\$1,639	1	1	1	200	14	4	3.5
996DD	Y	53121	12	96	2	A	1818	0	\$39,361	\$36,417	\$0	\$244	1	4	1	600	6	4	1.5
99730	Y	53121	12	96	2	A	78427	0	\$122,753	\$77,218	\$17,813	\$9,459	1	5	1	800	501	1	501
99731	Y	53121	12	96	5	A	28926	0	\$55,900	\$50,484	\$0	\$5,916	1	7	1	1200	44	2	22
99732	Y	53121	12	96	5	A	69676	0	\$87,136	\$32,192	\$28,947	\$13,370	1	7	1	1200	44	2	114.95
99733	Y	53121	12	96	5	A	96536	18	\$112,803	\$52,500	\$28,531	\$21,579	1	5	1	800	318.6	2	159.3
99734	Y	53121	12	96	2	A	7274	0	\$25,943	\$9,189	\$12,369	\$815	1	3	1	450	24	2	12
99735	Y	53121	12	96	4	A	7122	480	\$25,008	\$24,391	\$0	\$617	1	1	1	25	23.5	2	11.75
99736	Y	53121	12	96	4	A	17124	352	\$32,284	\$31,039	\$0	\$1,245	1	1	1	25	56.5	2	28.25
99738	Y	53121	12	96	4	A	12941	385	\$24,000	\$22,505	\$0	\$1,495	1	1	1	30	42.7	2	21.35
99740	Y	53121	12	96	4	A	11062	407	\$27,000	\$24,885	\$0	\$1,000	1	1	1	25	36.5	2	18.25
99741	Y	53121	12	96	5	A	22670	440	\$25,455	\$23,455	\$0	\$1,777	1	2	1	100	149.6	4	37.4
99744	Y	53121	12	96	4	A	10698	444	\$30,169	\$28,034	\$0	\$1,136	1	1	1	25	35.3	2	17.65
99746	Y	53121	12	96	4	A	37338	281	\$41,200	\$38,041	\$0	\$3,159	1	1	1	30	123.2	2	61.6
99747	Y	53121	12	96	4	A	10456	344	\$28,334	\$26,745	\$0	\$1,589	1	1	1	25	34.5	2	17.25
99751	Y	53121	12	96	4	A	7365	404	\$20,632	\$19,408	\$0	\$692	1	1	1	25	24.3	2	12.15
99753	Y	53121	12	96	4	A	5940	443	\$25,777	\$23,734	\$0	\$843	1	1	1	40	19.6	2	9.8
99754	Y	53121	12	96	4	A	7759	333	\$27,079	\$26,225	\$0	\$854	1	1	1	30	25.6	2	12.8
99755	Y	53121	12	96	4	A	10547	363	\$25,027	\$24,133	\$0	\$894	1	1	1	40	34.8	2	17.4
99756	Y	53121	12	96	4	A	6849	357	\$21,800	\$20,568	\$0	\$1,232	1	1	1	40	22.6	2	11.3
99757	Y	53121	12	96	4	A	7940	350	\$23,580	\$22,403	\$0	\$1,176	1	1	1	30	26.2	2	13.1
99759	Y	53121	12	96	4	A	18396	266	\$32,722	\$29,052	\$0	\$1,740	1	1	1	30	60.7	2	30.35
99760	Y	53121	12	96	4	A	21821	175	\$25,953	\$23,100	\$0	\$2,852	1	1	1	40	72	2	36
99762	Y	53121	12	96	5	A	69161	63	\$66,082	\$57,846	\$0	\$8,235	5	5	1	700	228.2	2	114.1
99763	Y	53121	12	96	4	A	5092	446	\$23,032	\$21,449	\$0	\$602	1	1	1	25	16.8	2	94.9
99764	Y	53121	12	96	4	A	1620	0	\$5,220	\$79	\$985	\$202	1	1	1	120	32	2	16
99766	Y	53124	12	96	4	A	34580	76	\$27,500	\$25,257	\$0	\$2,243	1	1	1	30	114.1	2	57.05
99767	Y	53121	12	96	4	A	11608	1450	\$30,498	\$29,270	\$0	\$1,228	1	1	1	25	38.3	2	19.15
99830	Y	53121	12	96	2	A	54865	0	\$119,095	\$34,883	\$58,456	\$11,946	1	1	1	1000	200	24	7.98
99860	Y	53121	12	96	4	A	13791	9	\$11,970	\$10,772	\$0	\$1,198	1	1	1	25	88.1	2	44.05

HCR ID	Renewal	Acct	Area	FY	Ris Type	Ris Part	Annual Miles	Box CL	Annual Cost	Fuel Cost	Driver Wages	CPI Cost	Type	Veh Grp.	No. of Vehicles	Vehicle Cubes	Sum of Trip Lengths	No. of Trips	Avg. Trip Length
996E1		53121	12	96	A		2758	168	\$28,701	\$27,119	\$0	\$782	1	1	1	60	9.1	2	4.55
996E3		53121	12	96	A		4698	364	\$45,523	\$43,435	\$0	\$1,288	1	1	1	120	15.5	2	7.75
996AA	Y	53121	12	96	A		1940	0	\$11,240	\$10,885	\$0	\$356	1	1	1	300	6.4	4	1.6
998CD	Y	53121	12	96	A		8118	0	\$41,620	\$37,844	\$0	\$1,580	1	1	1	600	30	10	3
998ED	Y	53121	12	96	A		5677	0	\$76,560	\$35,344	\$22,670	\$1,827	1	1	1	600	19.2	12	1.6
999BD	Y	53121	12	96	A		2004	0	\$73,330	\$54,423	\$0	\$772	1	1	1	600	6	10	0.6
999BD	Y	53121	12	96	B		5323	0	\$16,844	\$16,148	\$0	\$697	1	1	3	400	19.2	4	4.8
981AB	Y	53127	12	96	A		28642	0	\$56,754	\$1,021	\$43,868	\$6,769	1	12	1	0	20.4	2	10.2

WATER CONTRACTS

DECLARATION

I, Joe Alexandrovich, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Joe Alexandrovich", is written over a horizontal line.

Dated: 9/10/97

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
September 10, 1997