

BEFORE THE
POSTAL RATE COMMISSION

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**SECOND SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO
(UPS/USPS-T2-10 through 26)**

(September 12, 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 Nieto (UPS/USPS-T2-10 through 26).

Respectfully submitted,



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Of Counsel.

**UNITED PARCEL SERVICE SECOND SET OF INTERROGATORIES
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-10. Please confirm that NASS, and thus TRACs, does not include emergency highway contracts. If confirmed, please explain how the construction of the highway sample frame accounts for these contracts for developing distribution keys. If not confirmed, please explain your answer.

UPS/USPS-T2-11. Please provide the most recent versions of all publications, handbooks, manuals, instructions and other literature for the following:

- (a) National Air and Surface System (NASS)
- (b) Rail Management Information System (RMIS)
- (c) Air Contract Support System (ACSS)
- (d) Air Contract Dispatch Computer System (ACDCS)

UPS/USPS-T2-12. Please refer to page 3 of LR-H-78.

- (a) Explain why contracts would be active in the Highway Pay Master File and not contained in NASS.
- (b) List for FY96, by postal quarter, the number of contracts and type (Intra-SCF, Inter-SCF, etc.) listed in the Highway Pay Master File and not contained in NASS.

UPS/USPS-T2-13. Please refer to page 3 of LR-H-78.

- (a) Explain why contracts would be contained in NASS but not listed as active in the Highway Pay Master File.
- (b) List for FY96, by postal quarter, the number of contracts and type (Intra-SCF, Inter-SCF, etc.) contained in NASS but not listed as active in the Highway Pay Master File.

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UPS/USPS-T2-14. Please refer to LR-H-78. Provide machine readable copies of the complete files and detailed descriptions of record layouts and definitions, for FY96, by postal quarter for the following:

- (a) National Air and Surface System (NASS)
- (b) Rail Management Information System (RMIS)
- (c) Air Contract Support System (ACSS)

UPS/USPS-T2-15. Please refer to your response to FGFS/USPS-T13-30, and your reference therein to "LR-H-82, pp. 2398, 2402, 2406, 2410," concerning TRACS utilization figures. For each OBS number (1-16), for each of the pages referenced in LR-H-82, identify which Contract Type and Destination Facility Type the OBS number pertains to in Exhibit 2 of LR-H-78.

UPS/USPS-T2-16. Please refer to LR-H-78, Exhibit 2. For each Contract Type and Destination Facility Type shown, identify the:

- (a) origin facility(ies)
- (b) destination facility(ies)
- (c) facility location where the TRACs sample is taken

UPS/USPS-T2-17. In reference to your testimony at page 2, please provide a detailed account of the information contained in the National Air and Surface System (NASS) concerning transportation routes and costs, including a definition of the

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sample frame elements (e.g., contract routes) used by TRACS, and a listing and definition of all data items associated with each such element in NASS.

UPS/USPS-T2-18. In reference to your testimony at page 3, please provide a detailed account of the information contained in the Rail Management Information System (RMIS) concerning rail movements and costs thereof, including a definition of the sample frame elements (e.g., rail movements) used by TRACS, and a listing and definition of all data items associated with each element in RMIS.

UPS/USPS-T2-19. In reference to your testimony at page 4, please provide a detailed account of the information contained in the Air Contract Support System (ACSS) and the Official Airline Guide (OAG) concerning flights, including a definition of the sample frame elements used by TRACS (e.g., flight-days), and definition of all data items associated with each such element in ACSS and OAG.

UPS/USPS-T2-20. In reference to your testimony at page 5, please provide a detailed account of the information contained in the National Air and Surface System (NASS) concerning network city-days, including a definition of the sample frame elements (e.g., city-days) used by TRACS, and a listing and definition of all data items associated with each such element in NASS.

UPS/USPS-T2-21. In reference to your testimony at page 7, please identify the data source used to select Amtrak train segment-days and costs thereof,

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including a definition of the sample frame elements (e.g., train segment-days) used by TRACS, and a listing and definition of all data items associated with such elements in this data source or available related data bases as NASS.

UPS/USPS-T2-22. In reference to your response to FGFSA/USPS-T16-13, at page 2 of 5, please describe in detail how "two dimensional floorspace percentages are converted to three dimensional cubic footages." Are the actual interior freights of each truck or van recorded for this purpose, or is a standard height applied, and if so, what standard height(s) are used for each category of truck or van?

UPS/USPS-T2-23. In reference to your testimony at page 2, please describe how highway contract costs factor into the development of total highway cubic-foot miles for the different classes and sub-classes of mail:

- (a) Are costs for sampled routes including in the expansion process, and if so, how are the costs for the specific segment and destination-day sample determined?
- (b) How and at what level of aggregation are total costs for sampled routes combined in developing proportions for the different mailcodes?

UPS/USPS-T2-24. In reference to your testimony at page 2, and LR-H-78, at pages 2 to 3, please provide a complete listing of all contract highway routes in effect for the last accounting period of FY 1996, including the following information for each route:

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- HCRID number
- Trip route specifications for each trip route, including
 - Origin and destination of each segment
 - Highway mileage of each segment
 - Minimum truck capacity in cubic feet
 - Schedule, including number of days of operation and arrival/departure times
 - Annual cost of service
- Identification of contract type (Intra-SCF, Inter-SCF, etc.)

UPS/USPS-T2-25. Please refer to LR-H-78, Exhibit 2.

- (a) Please explain the rationale for the different sampling percentages allocated to each facility type by type of highway contract.
- (b) For each mailcode and highway contract type, please provide BY96 distribution keys in total and computed separately, for "Inbound" and "Outbound" destination facility types.

UPS/USPS-T2-26. Your testimony at pages 8 and 9 refers to "Table 2," but no reference is made to "Table 1." Please explain the apparent omission of "Table 1."

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: September 12, 1997
Philadelphia, PA