

DOCKET SECTION

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

NOTICE OF THE UNITED STATES POSTAL SERVICE
OF FILING OF SUPPLEMENTAL RESPONSES OF
WITNESS NIETO TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T2-12-13)

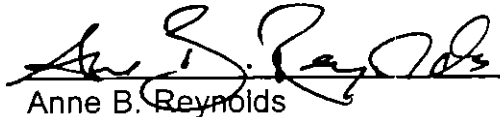
The United States Postal Service hereby provides supplementary responses of witness Nieto to the following interrogatories of United Parcel Service: UPS/USPS-T2-12(b) and 13(b), filed on September 12, 1997. These responses are intended to provide information that was unavailable to be filed on Friday, September 26, with the interrogatory responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2970; Fax -5402
September 29, 1997

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
OF UNITED PARCEL SERVICE

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.

Response to UPS/USPS-T2-12:

Please note that the following answer refers specifically to the extracts from the Highway Pay Master File and NASS which are taken on a specific day for the purposes of developing the TRACS sample frame. I have not conducted a comprehensive study of this for all highway contracts over an extended period of time.

(a) Emergency and exceptional contracts which had activity in the period prior to sample selection would not be contained in NASS since they are not scheduled movements is one example. Also, since these extract represent a snapshot of live databases, there may be information in one which has not yet been updated in the other.

(b) The table below lists those contracts which were active in the Highway Pay Master File and were not in NASS at the time of sample selection:

<u>Account</u>	<u>Q1</u>	<u>Q2</u>	<u>Q3</u>	<u>Q4</u>
Intra-SCF	4341	4230	3997	3796
Inter-SCF	112	115	91	95
Intra-BMC	3	4	5	8
Inter-BMC	0	0	0	1

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
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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.

Response to UPS/USPS-T2-13:

Please note that the following answer refers specifically to the extracts from the Highway Pay Master File and NASS which are taken on a specific day for the purposes of developing the TRACS sample frame. I have not conducted a comprehensive study of this for all highway contracts over an extended period of time.

(a) There are several reasons in which this might occur. A new contract may not yet have had any payments against it and thus would not show activity in the Highway Pay Master File. A terminated contract may reflect that in the Highway Pay Master File and not yet have been deleted from NASS. Again, since these extract represent a snapshot of live databases, there may be information in one which has not yet been updated in the other.

(b) The table below lists the number of contract route-trips by postal quarter. This information is not available at the contract level or by account type:

	<u>Q1</u>	<u>Q2</u>	<u>Q3</u>	<u>Q4</u>
Route-Trips	48,071	49,749	52,701	53,950

DECLARATION


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

Norma B. Nieto

Dated: 9-29-97

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.



Anne B. Reynolds

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