DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97–1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NIETO TO INTERROGATORIES OF
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
AND MOTION FOR THEIR LATE ACCEPTANCE
(FGFSA/USPS–T2—48–55)
(October 1, 1997)

The United States Postal Service hereby provides responses of witness Nieto to the following interrogatories of the Florida Gift Fruit Shippers Association: FGFSA/ USPS–T2—48–55, filed on September 16, 1997. Each interrogatory is stated verbatim and is followed by the response.

The Postal Service additionally moves that this set of responses be accepted one day late. One of the discovery requests in this set required the witness to perform an unanticipated and significant amount of background analysis; this, coupled with her need to respond to a substantial number of discovery requests filed on September 16 and 17, caused the delay. The undersigned counsel has informed counsel for

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION

FGFSA/USPS-T2-48

Assume that there are two identical parcel post parcels (each parcel being 1 ft x 2 ft x 1 ft) , and each parcel having a weight of 20 lbs.. Two of these parcels are placed in each of two trailers (40 ft. x 8 ft. x 7 ft.), for Intra-BMC transportation, and that both parcels are sampled at the place of unloading in the TRACS program. In trailer No. 1, the two parcels are placed on the floor of the trailer, side by side. In trailer No. 2, the two parcels are placed on the floor of the trailer, one on top of the other. No other mail is placed on top of the parcels in either trailer.

a) Explain the computation to record the actual cubic feet of each parcel.

b) Explain how the cubic feet of each parcel is expanded under the TRACS programs.

c) How is the fact that the two parcels are stacked one on top of the other, recorded in the TRACS sample data?

d) If the one trailer is 10% empty at the time of the TRACS sample, how does this affect the expanded cubic feet?

e) If the one trailer is 50% empty at the time of the TRACS sample, how does this affect the expanded cubic feet?

f) Will the cubic feet of the two parcels be the same under each a) and b) above? If not, explain why there is a difference.

Response to FGFSA/USPS-T2-48:

In order to provide an adequate response, we have made several simplifying assumptions:

-- All mail was loaded onto the truck at the stop preceding the test;

-- All mail was unloaded from the truck at the time of testing; and,

-- The two loose parcels comprise all mail in the item group "Other" (the other groups are "Wheeled", "Pallets", "Sacks" and "Express")

a) The formula for calculating cubic feet based on recorded sample weights can be found in HWY 1, PQ196, on line 73 (and in similar locations for other quarters):

(1) CUFT = WT * DENSITY, where DENSITY is a cubic feet-per-lb. factor for each rate category.

In the case of a 20 lb. parcel, we have:

CUFT = 20 lbs. * 0.14253 (density factor for mailcode P) = 2.8506.

b) Please note that the order of the calculations shown below is not exactly the same as found in the TRACS programs; we have presented them this way for purposes of simplicity.

The first step in expansion is to calculate cubic feet from sampled weights, as shown above. Since we are dealing with loose parcels, there is no need for any expansion up to the sampled item level (as there would be for mail found in box-type containers or sacks).

Next, the cubic feet of the parcels is expanded to match the utilization proportions of the particular group in the truck which corresponds to the sampled parcels. Loose parcels would be included in the group OTHER. This equation can be found in HWY 6, PQ196, line 50:

(2) CUFT = (CUFT/GRPCUFT) * OTHER,

where CUFT has been calculated above in (1),

GRPCUFT is the cubic foot sum for each item group on each truck, and OTHER is the cubic feet calculated by expanding the percentages of floor space occupied by each item group of mail up to the truck's capacity.

To calculate the value of OTHER (Note: this is a combination of more than one equation from TRACS programs):

(3) OTHER = (CAPACITY * (% of floor space occupied by loose items) / TOTAL) * UNLOADED,

where CAPACITY is the total cubic-foot capacity of the truck (40 * 8 * 7 = 2240 cu. ft.), the percentages of floor space are recorded by TRACS data collectors,

TOTAL is the sum of the cubic feet unloaded for each of the 5 item groups, and

UNLOADED is the total cubic feet unloaded from the truck. (Note: Since we are assuming that all mail is unloaded at the time of the test, TOTAL and UNLOADED take on the same value.)

Assuming that if the two parcels are stacked, the floor space occupied is 1% (see response below to part c.). Then, OTHER = 2240 * 0.01 = 22.4 cu. ft.
Thus, since GRPCUFT = 2.8506 + 2.8506 = 5.7012, the cubic foot sum of the two parcels, then for each parcel, CUFT = (2.8506/5.7012) * 22.4 = 11.2 cu. ft.

c) The difference would be found in the way that the TRACS data collector records the percentage of floor space taken up by each item group. If the parcels were stacked, a data collector would likely record that they take up 1% of the floor space. For comparison purposes, we will assume that the parcels side by side would be recorded as having taken up 2% of the floor space.

d) If a truck has empty space on it, then TRACS does one last expansion to the cubic feet to allocate the empty space across all the mail found on the truck. In this example, we use the percentage given in the question. The equations for allocating the empty space can be found in HWY10, PQ196, lines 36-41, which will result in the final, expanded cubic feet data:

(4) EMPTY = CAPACITY * Percentage of truck that is empty

Here, EMPTY = 2240 * 0.10 = 224 cu. ft. of empty space

(5) CUFT = CUFT + (CUFT/(CAPACITY - EMPTY)) * EMPTY

Thus, CUFT = 11.2 + (11.2/(2240-224)) * 224 = 12.4 cu. ft.

e) The process and equations used to expand TRACS data and allocate empty space are identical to those described above, with the exception of a different amount of empty space calculated in (5):

(4) EMPTY = 2240 * 0.50 = 1120 cu. ft. of empty space

(5) CUFT = 11.2 + (11.2/(2240-1120)) * 1120 = 22.4 cu. ft.

f) No. As described above in part d., TRACS data collectors would record different percentages of floor space occupied by the parcels in the two scenarios, which would necessarily vary the output of (4), and thus the result of the subsequent equations as well.

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FGFSA/USPS-T2-49

Please confirm that the amounts shown for PERCONT in the percentage of the container filled with items of the same item type. If you do not confirm, please provide the correct terminology.

a) Is the item type the same as mailcode? If not, please explain.
b) Confirm that the cubic feet occupied by the sampled mail is expanded to the container level in EXPAND(HWY1) If not, where does this expansion occur?
c) In the expansion to the container level, how is the amount shown as PERCONT taken into account?
d) If the PERCONT is shown to be 55, will only 55% of the standard cubic feet of the container be taken into account? If not, please explain.

Response to FGFSA/USPS-T2-49:

Confirmed with clarification. PERCONT is percentage of the container filled with items of the same item type, in whole numbers rather than decimal percentages. PERCONT may be recorded either relatively (i.e., sum of PERCONT within an item always adds up to 100%), or absolutely (i.e., sum of PERCONT within an item can falls short of 100% by the percentage of the item that was empty). Due to subsequent normalization of cubic footages in the expansion to container size, this distinction is irrelevant since all relative proportions are preserved. PERCONT will be missing if the DCT recorded the distribution of item types within the container by quantities rather than percentages.

a) Not confirmed. TRACS distinguishes numerous item types including envelope trays, half size envelope trays, flat trays, small parcel trays, CON-CONs, sacks, and loose mail pieces. When an item (such as an envelope tray) is selected for sampling, the Data Collection Technician (DCT) takes all mail from within that item and groups it by TRACS mailcode category (usually related to rate category for a class or subclass of mail) for weighing and piece counting.

b) Confirmed.

c) In cases where the DCT recorded the distribution of items found within a container in terms of percentages (rather than quantities of each itemtype), the variable

PERCONT is used in distributing the cubic feet of the container to the mailcodes found within the sampled item of each item type found in the container.

Note that it does not matter whether the data collector records PERCONT as the *percentage of the container* filled by each itemtype (in which case PERCONT will not add up to 100 if the container is not full), or as the percentage of the full portion of the container for each itemtype (in which case PERCONT will add up to 100 regardless of empty space) because it is only the relative proportions that matter, as everything is normalized to add up to the size of the container in line 295. This is also why it is irrelevant that PERCONT is a whole number rather than a decimal percentage. While all cubic footages are overstated by a factor of 100 after the calculation in line 278, the relative proportions are maintained and the cubic footages are normalized to add up to the size of the container in line 295.

d) No. Please refer to my response above in FGFSA/USPS-T2-49 (c).

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FGFSA/USPS-T2-50

Please refer to the qtr 1 records for TESTID 09306AG. Please confirm:

a) This sampling occurred at a BMC on an inbound movement.

b) The sample from container no. 1 shows:

i. The PERCONT was 55

ii. 1 piece of mailcode P, having a weight of 7.1875 pounds

iii. The calculated cubic feet of the sample is 1.02444 cu. Ft.

iv. The expanded cubic feet, in EXPAND(HWY1), is 110.610.

c) The sample from container no 2 shows:

i. the PERCONT was 75.

ii. 1 piece of mailcode P, having a weight of 1.3125 pounds

iii. The calculated cubic feet of the sample is 0.18707 cu. Ft.

iv. The expanded cubic feet, in EXPAND(HWY1) is 110.610

d) The sample from container no. 5 shows:

i. The PERCONT was 60.

ii. A piece of mailcode P, having a weight of 5.6875 pounds.

iii. The calculated cubic feet of the sample is 0.81065 cu. Ft..

iv. The expanded cubic feet, in EXPAND(HWY1) IS 110.610.

e) The combined expanded cubic feet for the three containers (1, 2 &5) is 331.220 cu.ft.

f) The combined cubic feet was further expanded, in EXPAND(HWY6), to a total of 1,620 cu. Ft.

i. explain why the 331.20 cu. Ft. was expanded to 1,620 cu. Ft, which is an expansion factor of 4.891.

g) 1,620 cu. Ft. is the amount taken into account for these samples, after converting the cu. Ft. into cubic foot miles, in the determination of the distribution key.

h) The sample from container no. 3 shows:

i. The PERCONT was 70.

ii. 1 piece of mailcode M, having a weight of 0.25 pounds.

iii. The calculated cubic feet of the sample is 0.01415 cu. Ft.

iv. The expanded cubic feet, in EXPAND(HWY1), IS 110.61.

I) The sample from container no. 4 shows:

i. The PERCONT was 80.

ii. 1 piece of mailcode M, having a weight of 0.75 pounds.

iii. The calculated cubic feet of the sample is 0.04244 cu. Ft.

iv. The expanded cubic feet, in EXPAND(HWY1) is 110.61.

j) The combined expanded cubic feet for the two containers (3 & 4) is 221.220.

k) The combined cubic feet was further expanded, in EXPAND(HWY6) to a total of 1,080 cu. Ft.
i. Explain why the 221.220 cu. Ft. was expanded to !,080 cu. Ft., which is an expansion factor of 4.882.
l) 1,080 cu. Ft. is the amount taken into account for these sample, after converting the cu. Ft. into cubic foot miles, in the determination of the distribution key.

m) Explain why the expansion factor used for mailcode P in different from the expansion factor used for mailcode M.

Response to FGFSA/USPS-T2-50:

a) Confirmed.

b) i) Confirmed.

ii) Confirmed.

iii) Confirmed.

iv) Confirmed.

c) i) Confirmed.

ii) Confirmed.

iii) Confirmed.

iv) Confirmed.

d) i) Confirmed.

ii) Confirmed.

iii) Confirmed.

iv) Confirmed.

e) Not confirmed. The combined cubic feet of 3 containers each 110.61 cubic feet is 331.83 cubic feet, not 331.22 cubic feet.

f) Confirmed.

i) It was recorded that the entire 2,700 cubic foot truck was full of wheeled containers, which were all unloaded. Five containers were selected for sampling. For each container sampled, a data collection technician selected one item of each item type for sampling. All five containers contained only loose items, so one loose item was sampled from each container. The loose items sampled from containers 1, 2, and 5 were all mailcode 'P'; thus the combined 331.83 ft^3 (110.61 ft^3 times 3 containers) of these three containers was assigned to mailcode 'P'. The loose items sampled from containers 3 and 4 were both mailcode 'M'; thus the combined 221.22 ft^3 of these two containers was assigned to mailcode 'P'. The total cubic footage of all five sampled containers is 553.05. Since only wheeled containers were found on the truck, the mail found on the sampled containers is expanded to the entire 2,700 cubic feet of the truck. This is done in line 44-53, which, for wheeled containers, sets CUFT = (CUFT/GRPCUFT) * WHEELED. Inserting the appropriate numbers gives: CUFT = (331.83 / 553.05) * 2700. (WHEELED is equal to 2,700 because 100% of the truck was occupied by wheeled containers.

g) Confirmed with clarification. 1,620 expanded cubic feet for mailcode 'P', multiplied by the miles traveled by these wheeled containers, multiplied by the cost per cubic foot mile of the contract, is what is used in determining the distribution key.

h) i) Confirmed.

ii) Confirmed.

iii) Confirmed.

iv) Confirmed.

i) i) Confirmed.

ii) Confirmed.

iii) Confirmed.

iv) Confirmed.

j) Confirmed.

k) Confirmed. For an explanation please refer to my above response to FGFSA/USPS-T2-50 (f) (i).

l) Confirmed with clarification. 1,080 expanded cubic feet for mailcode 'M', multiplied by the miles traveled by these wheeled containers, multiplied by the cost per cubic foot mile of the contract, is what is used in determining the distribution key.

m) The "expansion factor" for mailcode 'P' is not different from the expansion for mailcode 'M'. Your calculation of the cubic feet of the three containers assigned to mailcode 'P', which you state to be 331.22 in question (e), and 331.20 in question (f), is slightly inaccurate. Using the correct cubic feet of 331.83 yields the same "expansion factor" for both mailcodes.

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FGFSA/USPS-T2-51
Please refer to the qtr 1 records for TESTID 09336BE. Please confirm:

a) This sampling occurred at a BMC on an inbound movement. And the vehicle was 70% empty.
b) Three containers were sampled, each having a piece of mailcode P.
c) The combined weights of the 3 sampled pieces was 16.6875 pounds.
d) The combined calculated cubic feet of the sampled pieces was 0.99772 cu. Ft.
e) The cubic feet for the samples was expanded, in EXPAND(HWY1), to 48.640 cu. Ft. for each sample, and, in EXPAND(HWY4) combined in the total of 145.920 cu. Ft.
f) The combined cubic feet was further expanded, in EXPAND(HWY10) to a total of 1,885 cu. Ft.
g) The total of 1,885, after being converted to cubic foot miles, is the amount taken into account in the determination of the distribution key.

Response to FGFSA/USPS-T2-51:

a) Confirmed.

b) Confirmed with clarification: One loose item was sampled from each of the three containers, and no other types of items (such as sacks or trays) were in the container. In each case the loose item selected for sampling was a piece of mailcode P.

c) Confirmed.

d) Not confirmed. The combined calculated cubic feet of the first two parcels is 0.99772. The total calculated cubic feet for the three sampled parcels is 2.37849.

e) Confirmed.

f) Not confirmed. In program EXPAND(HWY6), the cubic feet of the items and mailcodes in the group is expanded to represent the cubic feet occupied by the same group of items in the truck. For this test, wheeled containers represented all of the unloaded mail, or 30% of the floor space. The 30% is converted into cubic feet of capacity (2400*.30), or 810 cubic feet. The 145.92 cubic feet is expanded to represent all items in wheeled containers, or up to 810 cubic feet at this point. In

EXPAND(HWY9), the data set containing the cubic feet information is assigned to either USPS.LASTLEG or to both USPS.CUBELEG and USPS.LASTLEG. USPS.CUBELEG contains groups of items which were loaded onto the vehicle prior to one stop before the test destination. In this test, these wheeled containers were loaded onto the truck two facilities prior to the destination. There is one record in the USPS.CUBELEG database representing the segment of the origin to the stop prior to the destination, and one record in USPS.LASTLEG representing the segment from the last stop to the final destination where the containers where unloaded. In EXPAND(HWY10), empty space is assigned separately to these databases. For the USPS.CUBELEG segment, a proportion of the average empty space (EMPTYAVG) for all trips corresponding to the ACCOUNT-FACCAT group is assigned, as follows:

CUFT=CUFT+(CUFT/(CAPACITY-EMPTY))*EMPTY
CUFT=810 + (810/(2700-1489.90))*1489.90 = 1807.29

where EMPTY is calculated as EMPTY=(CAPACITY*EMPTYAVG)/100.

For the USPS.LASTLEG, the equation is the same as above, except EMPTYAVG is replaced by EMPTY, the actual empty space observed by the data collector. The CUFT for USPS.LASTLEG is then:

CUFT=810 + (810/(2700-1890))*1890 = 2700.00

Please note that these total CUFT are not combined. Miles are first assigned to the segments separately, and then the CFMs are combined.

g) Not confirmed. As discussed in part f., the CFMs as arrived at are the amount which cost per cubic foot mile is applied to in order to calculate the distribution key.

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FGFSA/USPS-T2-52

Please refer to the qtr I records for TESTID 09336JM. Please confirm:

a) This sampling occurred at a BMC on an inbound movement.
b) The sampling included a piece if mailcode U having a weight of 0.5 pounds.
c) The sample mailcode U had a calculated cubic feet of 0.04870.
d) When expanded in EXPAND(HWY1) this sample is shown to have cubic feet of 0.006.
   i. explain why the calculated cubic feet is greater than the expanded cubic feet.
e) When further expanded in EXPAND(HWY6) this sample is shown to have cubic feet of 0.06.
f) The expansion of cubic feet from 0.006 to 0.06 reflects an expansion factor of 10.
g) The sampling included 183 pieces of mailcode M having a weight of 8.125 pounds.
h) The sampled mailcode M had a calculated cubic feet of 0.45974.
i) When expanded in EXPAND(HWY1) this sample is shown to have cubic feet of 49.340.
j) When further expanded in EXPAND(HWY6) this sample is shown to have cubic feet of 541.54.
k) The expansion from 49.340 to 541.54 reflects an expansion factor of 10.97

Response to FGFSA/USPS-T2-52:

a) Confirmed.

b) Confirmed. 'U' was one of three mailcodes found in the flat tray sampled from the fourth container.

c) Confirmed.

d) Confirmed.

i) It appears that the data collector recorded 2 flat trays and 85% loose parcels, which is an unanticipated combination of a number of items and a percentage. This resulted in the cubic feet of flat trays being interpreted as taking up only 2% of the container. Normalization to the cubic feet of the container

resulted in the reduction of the cubic feet of these flat trays to 2% of the cubic feet of the container. Properly accounting for instances when data collectors recorded such unanticipated combinations has a small impact on the distribution keys. Re-running PQ 1, FY 1996 with this corrected resulted in no changes to the distribution keys more significant than the third decimal place. Library Reference H-288, filed on October 1, 1997, shows the results of that analysis.

e) Confirmed.

f) Confirmed.

g) Confirmed. Container #2 (An ERMC, dimensions 49" x 29" x 70") was 20% full and contained nothing but sacks. The sampled sack contained 183 pieces of mailcode 'M', which in sum weighed 8.125 lbs.

h) Confirmed.

i) Confirmed, assuming "this sample is shown to have a cubic feet of 49.340" refers to the sample of mailcode 'M' from container #2. As 'M' was the only mailcode found in the sack sampled from container #2, and container #2 contained only sacks, mailcode 'M' is assigned the entire 49.340 ft^3 of the container.

j) Confirmed.

k) Confirmed that 541.54 / 49.34 equals approximately 10.97. It is only appropriate to call this an "expansion factor" if it is understood that this "expansion factor" is based on numerous elements including the size of the truck, the portion of the truck containing wheeled containers, and the mix of wheeled containers unloaded from the truck.

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FGFSA/USPS-T2-53
Please refer to the qtr 1 records for TESTID 70786RJ;

a) The number 9 is recorded as SETASIDE. Explain what this refers to.
b) The sample data is recorded and expanded as follows:

Mailcode	Freq	Calc cu.ft.	Expanded cu.ft.	
S	1	0.056	480.	EXPAND(HWY1) AND (HWY6)
S	3	3.353	1,112.80	(HWY6)
Q	2	0.239	79.83	(HWY6)
P	1	1.470	487.83	(HWY6)
J	2	2.512	240.	(HWY6)

c) Explain why the expansion factor for each mailcode is different.

Response to FGFSA/USPS-T2-53:

a) "SETASIDE" refers to various containerized and non containerized item types that are "set aside" for sampling as a truck is unloaded, and does not represent a quantity or any other value used in mathematical calculations. The primary "SETASIDE" codes are shown below:

1 BMC-OTR
2 ERMC
3 GPC/GPMC
4 HAMPER
5 WIRETAINER
6, 10 POSTAL PAK
7 OTHER CONTAINER
8-9 NON-CONTAINERIZED

The significance of the number '9' is that the item in question was non-containerized, i.e. a loose bedloaded item.

b) FGFSA has not posed a question with this subpart.

c) The "expansion factor" from calculated cubic feet to cubic feet expanded to the truck level will vary between floorspace utilization categories (WHEELED, SACKS, PALLETS, EXPRESS, OTHER), but not within those categories. For example, in the

table in part b) of this question, we have mailcode 'S' appearing twice. The first time it is sampled from a wheeled container, and the second time it is sampled as a loose item. Because the cubic feet of mailcodes are expanded up to their container level, and the container type is not always the same, there may be a difference in the expansion factor for mailcodes in different container types. These containers are then expanded to the cubic feet of their floorspace utilization categories (WHEELED, SACKS, PALLETS, EXPRESS, OTHER), and there will be different expansion factors for each of these categories. Any slight difference observed within the same category can be attributed to rounding error.

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FGFSA/USPS-T2-54
Please provide, for each quarter in FY 1996, the TRACS data for account 53127, bound 1, account 53127, bound 2, and account 53131 showing for each mailcode the total number of pieces sampled, the weight of those pieces and the calculated cubic feet of those pieces.

Response to FGFSA/USPS-T2-54:

Please refer to LR-H-288, filed October 1, 1997 for this information.

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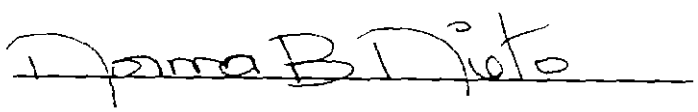
FGFSA/USPS-T2-55
Please refer to Library Reference H-84. On CD 4 for PQ1 there can be accessed the file named: TRACSSMN.Z.HIGHWAY.PG*96.SURVEY.TEXT which is on the CD as \RATECLAS\TRACS\HIGHWAY\SURVEY\PQ*96___SU.DAT. However for PQs 2, 3 & 4, 1996, these files exist in the HIGHWAY directory, but not in the SURVEY directory, at least not in the format expected by the SAS programs. Please provide format directions to access these files for the three postal quarter, or provide whatever instructions or information necessary to do so.

Response to FGFSA/USPS-T2-55:

The three files referenced above were inadvertently left in their native mainframe EBCDIC format as opposed to PC ASCII format. The SAS modules SAS/ACCESS and SAS/CONNECT would be required to read these files on a PC. Please see the attached floppy disk, LR-H-288, for the compressed "ZIP" file SURVEY96.ZIP, which, once "unzipped", will produce these three files in ASCII format.

DECLARATION

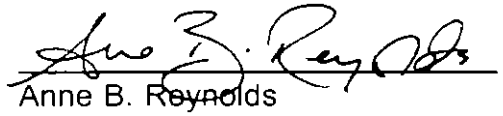
I, Norma B. Nieto, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 10-1-97

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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October 1, 1997

FGFSA of the holdup in filing these responses, and the Postal Service regrets any prejudice that it may cause.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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