

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE FOLLOW-UP
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
UNITED PARCEL SERVICE WITNESS NEELS: USPS/UPS-T1-35 THROUGH 39
October 6, 2006

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to the United Parcel Service witness Kevin Neels: USPS/UPS-T1-35 through 39.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 6, 2006

**UNITED STATES POSTAL SERVICE FOLLOW-UP
INTERROGATORIES TO UNITED PARCEL SERVICE WITNESS NEELS**

USPS/UPS-T1-35.

Please refer to your responses to USPS/UPS-T1-6(d)-(e).

- a. Please confirm that to correspond to Dr. Bozzo's MODS operation groups, you should have included MPBCS equipment in the the act_mods_group '0 D/BCS.' If you do not confirm, please explain.
- b. Please confirm that to correspond to Dr. Bozzo's MODS operation groups, you should have included LIPS equipment in the the act_mods_group '67 SPBS.' If you do not confirm, please explain.

USPS/UPS-T1-36.

Please refer to your responses to USPS/UPS-T1-7(d). Please assume that the FHP conversion error is symmetrically distributed and answer the hypothetical to which you did not respond in USPS/UPS-T1-7(d).

USPS/UPS-T1-37.

Please refer to your response to USPS/UPS-T1-10(e). Please also refer to your testimony at page 26, lines 12-13. Please confirm that you did not conduct any analysis of the effects of the screening levels on the sample composition. If you do not confirm, please explain your original testimony, provide a description of the analysis you performed, and provide all supporting documentation.

USPS/UPS-T1-38.

Please refer to your response to USPS/UPS-T1-11(f). Please also refer to your Docket No. R2000-1 testimony, UPS-T-1, at page 58, lines 14-16 (Docket No. R2000-1, Tr. 27/12830), where in explaining differences between the results of your analysis and the Postal Service models, you stated:

This pattern is likely explained by the elimination of gross errors in data reporting across the two parcel sorting operations.

- a. Please confirm that you did claim to have eliminated some (not all) data errors in your Docket No. R2000-1 analysis, as cited above. If you do not confirm, please explain.
- b. Please confirm that the "elimination of gross errors" you claimed to have achieved in the referenced Docket No. R2000-1 analysis was due to an aggregation of data such as in USPS/UPS-T1-11(e)—i.e., certain offsetting errors you felt were in the component data were cancelled out in the aggregate data. If you do not confirm, please explain.

USPS/UPS-T1-39.

Please refer to your response to USPS/UPS-T1-8(b) and USPS/UPS-T1-9(a), where you indicate that you carried out your screening at an “operation level” finer, at least in some cases, than the Postal Service cost pools.

- a. Did you also employ operation-level screens for the model you present in Section 6 of UPS-T-1?
- b. Where you screened at finer levels than the cost pools, did you analyze the quantitative significance of the operation-level anomalies at the cost pool level and/or at the level of aggregation you employed in your Section 6 model? If so, please describe your methods in detail. If not, why not?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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