

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-5-6)

The United States Postal Service hereby provides its institutional responses to the following interrogatories of United Parcel Service, filed on October 30, 2006:

UPS/USPS-5-6

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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UPS/USPS-5. For each of the following functions, provide the total labor hours from the MODS database for every quarter from FY1999 Q1 through FY2005 Q4 and for each IDNUM listed in vv9905.xls of Section1/data of USPS-LR-L-56:

- (a) 0, Operations Support;
- (b) 1, Mail Processing;
- (c) 2, Delivery Services;
- (d) 3, Maintenance;
- (e) 4, Customer Services;
- (f) 5, Finance;
- (g) 6, Human Resources;
- (h) 7, Customer Services Support;
- (i) 8, Administration;
- (j) 9, Training; and
- (k) Special Operations.

RESPONSE:

The requested data are provided in USPS-LR-L-190, file UPS-5-MODS.xls. For the purposes of the response, the “functions” are defined using the LDCs assigned to the three-digit MODS operation numbers. Since each valid MODS operation has an associated LDC, please note that there are no hours assigned to the “special operations” category listed in part (k). Also please note that since the sites corresponding to IDNUM values in the USPS-LR-L-56 data set are various types of mail processing facilities, the presence of labor hours for non-mail processing functions (e.g., delivery services, customer services, finance) depends on whether facilities where the other functions are present employ the same finance number(s) as the mail processing facilities.

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UPS/USPS-6. For each of the following LDCs [sic], provide total labor hours and total labor costs from the National Workhours Reporting System for every quarter from FY1999 Q1 through FY2005 Q4 and for each IDNUM listed in vv9905.xls of Section1/data of USPS-LR-L-56:

- (a) 0, Operations–Support;
- (b) 1, Operations–Mail Processing;
- (c) 2, Operations–Delivery Services;
- (d) 3, Operations–Maintenance/Transportation;
- (e) 4, Operations–Customer Service;
- (f) 5, Finance;
- (g) 6, Human Resources;
- (h) 7, Customer Service and Sales;
- (i) 8, Administration (Field);
- (j) 8, Headquarters General Management (HQ and Related Units); and
- (k) 9, Training.

RESPONSE:

The requested data are provided in USPS-LR-L-190, file UPS-6-NWRS.xls. The provided data set was produced under the assumption that the question seeks NWRS data for the listed “functions,” and not specifically for LDCs 0-9. Please note that the data frequency is based on the 52-week Postal Service fiscal calendar prior to FY 2004, and the U.S. government fiscal calendar for FY 2004 and FY 2005.

Regarding part (j), please note that the mail processing sites associated with the specified IDNUM variable do not include Postal Service headquarters, so the “function 8” labor hours and labor costs correspond to “field administration,” as in part (i) of the request. Also please note that since the sites corresponding to IDNUM values in the USPS-LR-L-56 data set are various types of mail processing facilities, the presence of labor hours and associated costs for non-mail processing functions (e.g., delivery services, customer services, finance)

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depends on whether facilities where the other functions are present employ the same finance number(s) as the mail processing facilities.