

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAGE
TO INTERROGATORY OF UNITED PARCEL SERVICE,
REDIRECTED FROM WITNESS KIEFER (USPS-T-37)
(UPS/USPS-T37-3(D))
(June 27, 2006)

The United States Postal Service hereby provides the response of witness Page (USPS-T-23) to the above listed interrogatory of United Parcel Service, filed on June 13, 2006, and redirected from witness Kiefer (USPS-T-37).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187

INTERROGATORY OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS PAGE,
REDIRECTED FROM WITNESS KIEFER

UPS-T37-3(d). Refer to library reference USPS-LR-L-59, Attachment 4D and Attachment 14A, page 3.

- i. Confirm that the cost of no-additional-fee electronic Delivery Confirmation for Package Services applied in the final adjustments process is \$0.1467 per piece per Attachment 4D, "Volume Variable Costs Summary – Delivery Confirmation TY 2008(BR)." If not confirmed, explain in detail.
- ii. Confirm that in the final adjustment process in Attachment 14A, "Shift Other Special Services Cost to Respective Subclass," this cost of \$0.1467 per piece is applied to 100% of the Parcel Select volume. If not confirmed, explain in detail.

RESPONSE:

i. Confirmed.

ii. Confirmed.