

**BEFORE THE  
POSTAL RATE COMMISSION**

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**POSTAL RATE AND FEE CHANGES, 2006**

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**DOCKET NO. R2006-1**

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**INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS KELLEY  
(UPS/USPS-T15-1)  
(July 10, 2006)**

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatory directed to United States Postal Service witness Kelley:

UPS/USPS-T15-1.

Respectfully submitted,

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UPS/USPS-T15-1. Refer to USPS-T-15, page 8; USPS-T-9, page C-16;  
and USPS-LR-L-77, page H-1.

(a) Confirm that the base year and test year Alaska Air adjustment factor is 0.0702. If not confirmed, explain in detail.

(b) Confirm that the BY2005 Alaska non-preferential air costs were \$114,027,000. If not confirmed, explain in detail.

(c) Confirm that the volume variable Alaska non-preferential air costs were \$8,005,000 after application of the adjustment factor, of which \$7,773,000 were attributed to Parcel Post. If not confirmed, explain in detail.

(d) Confirm that Alaska Bypass revenue for Parcel Post was \$17,085,340 in BY2005. If not confirmed, explain in detail.

(e) Explain in detail why \$17,085,340 of BY2005 Alaska Bypass revenue was assigned to Parcel Post if only \$7,773,000 of BY2005 Alaska non-preferential air costs were attributed to Parcel Post.