

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

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS JOHN KELLEY (APWU/USPS T30-1-5)
(July 14, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness John Kelley. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T30-1 What are the primary drivers of differences in unit delivery costs?

APWU/USPS-T30-2 What is the average unit delivery cost in the base year and the test year of letter mail that has been delivery point sequenced?

APWU/USPS-T30-3 What is the average unit delivery cost in the base year and in the test year of letter mail that has not been delivery point sequenced?

APWU/USPS-T30-4 What are the primary factors that determine whether a letter shape piece of mail is delivery point sequenced?

APWU/USPS-T30-5 Please confirm that all accountable or registered mail would fall in the single piece category.