

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**INTERROGATORY OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS KIEFER
(UPS/USPS-T36-1)
(June 14, 2006)**

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

UPS/USPS-T36-1.

Respectfully submitted,

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UPS/USPS-T36-1. (a) Please confirm that, under the rates you have proposed, a Standard Mail Regular nonmachinable parcel that has been presorted to 3-digit ZIP Codes will receive a lower rate than a comparable machinable parcel sorted to BMCs.

(b) If the rate relationship described in subpart (a) is confirmed, please indicate whether the Postal Service intends to adopt rules to prevent machinable parcels from being made nonmachinable in order to benefit from the lower rates.