

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 MICHAEL W. MILLER TO INTERROGATORY OF  
UNITED PARCEL SERVICE (UPS/USPS-T21-14)  
(July 24, 2006)

The United States Postal Service hereby provides the response of Postal Service witness Miller (USPS-T-21) to interrogatory UPS/USPS-T21-14.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORY OF UNITED PARCEL SERVICE

**UPS/USPS-T21-14.** Refer to USPS-LR-L-46, pages 7 and 34.

- (a) Confirm that the Parcel Select BY 2005 volume of 276,623,565 in Row 9 on page 34 includes 6,692,322 PRS parcels from page 7. If not confirmed, explain in detail.
- (b) Confirm that mailers enter the PRS parcels at any post office, station, branch, or collection box, with any letter carriers, as part of a collection run for other mail, or at any place designated by the postmaster for the receipt of mail (see DMM 507.11.1.4). If not confirmed, explain in detail.
- (c) Refer to USPS-LR-L-86, workbook file LR86PPWIN.xls, worksheet "Data." Would PRS parcels be treated as dropship or non-dropship in the IOCS activity codes? Explain your answer in detail.

**RESPONSE:**

(a) Confirmed.

(b) Confirmed.

(c) It is my understanding that PRS mail would likely be treated as "dropship" mail in the IOCS activity codes. It is also my understanding that it is not possible to distinguish between any PRS-related tallies and non-PRS Parcel Select tallies at this time.