

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 BERKELEY
TO INTERROGATORY OF UNITED PARCEL SERVICE,
REDIRECTED FROM WITNESS PAGE
(UPS/USPS-T23-4)
(July 24, 2006)

The United States Postal Service hereby provides the response of witness Berkeley (USPS-T-39) to the above-listed interrogatory of United Parcel Service, filed on July 10, 2006, and redirected from witness Page.

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BERKELEY (USPS-T-39) TO
INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T23-4)
REDIRECTED FROM WITNESS PAGE**

UPS/USPS-T23-4. Refer to your response to PSA/USPS-T37-7(d); USPS-LR-L-59, Attachment 14A, "Delivery Confirmation Worksheet," page 4 of 19; and USPS-T-7, Attachment A. Confirm that the "Grand Total" on the Delivery Confirmation Worksheet matches the Delivery Confirmation GFY volumes in USPS-LR-L-77, page K-12, for FY2005, and in USPS-T-7, Attachment A, for FY2006, FY2007, 2008 TYBR, 2007 TYAR, and 2008 TYAR.

(a) If confirmed, explain which 2008 TYAR delivery confirmation volumes in the Delivery Confirmation Worksheet would increase if Parcel Post Electronic 2008 TYAR delivery confirmation volume were to decrease to 195,291,269 per your response to PSA/USPST37-7(d).

(b) If not confirmed, explain in detail.

RESPONSE:

Confirmed that the "Grand Total" on the Delivery Confirmation worksheet in Attachment 14A of USPS-LR-L-59 matches the FY 2005 volume in USPS-LR-L-77, page K-12, and matches the FY 2006, FY 2007, FY 2007 TYAR, FY 2008 TYBR and FY 2008 TYAR volumes in USPS-T-7, Attachment A. I further confirm that the FY 2005 volume and the FY 2008 TYBR and FY 2008 TYAR volumes match those in USPS-LR-L-123, as revised July 3, 2006.

(a) The Delivery Confirmation volumes by mail class and subclass beyond FY 2005 are calculated based on the percentage compositions of the FY 2005 volumes. The FY 2008 TYAR Parcel Select Delivery Confirmation volume of

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BERKELEY (USPS-T-39) TO
INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T23-4)
REDIRECTED FROM WITNESS PAGE**

Response to UPS/USPS-T23-4 (Continued)

267,829,982 would only be lowered to 195,291,269 in the event that the total 2008 TYAR Delivery Confirmation volume decreased, thereby decreasing all mail class and subclass volumes.

(b) Not applicable.