

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSES OF POSTAL SERVICE WITNESS KIEFER
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-T37-11(a), (b) & (d))**

The United States Postal Service hereby provides the responses of witness Kiefer to the following interrogatories of United Parcel Service, filed on July 10, 2006: UPS/USPS-T37-11(a), (b) & (d). Part (c) was redirected to the Postal Service.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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UPS/USPS-T37-11. Refer to your response to POIR No. 3, Question 19(b).

- (a) What was the share of Non-PRS Parcel Select volume using no-fee Delivery Confirmation in:
- i. FY2003?
 - ii. FY2004?
 - iii. FY2005?
 - iv. FY2006 thus far?
- (b) Explain why some non-PRS Parcel Select mailers do not use no-fee Delivery Confirmation.
- (c) Explain specifically what steps a non-PRS Parcel Select mailer must perform in order to use no-fee Delivery Confirmation.
- (d) Refer to USPS-LR-L-77, pages H-1 and K-12.
- i. Confirm that the Parcel Select Electronic delivery confirmation transactions in FY2005 were 231,931,226. If not confirmed, explain in detail.
 - ii. Confirm that Non-PRS Parcel Select volume in FY2005 was 269,931,243 (sum of 64,993,386 DBMC parcels, 2,013,256 DSCF parcels, and 202,924,601 DDU parcels). If not confirmed, explain in detail.
 - iii. Confirm that Parcel Select Electronic delivery confirmation transactions in FY2005 represented 85.9% of the Parcel Select volume in FY2005.
 1. If confirmed, explain the reason for the difference between your 80% assumption and this 85.9% figure. If not confirmed, explain in detail.
 2. If this 85.9% figure does not match the figure provided in response to part (a)iii above, explain in detail.

RESPONSE:

- a. (i) 60.7 percent
(ii) 86.1 percent
(iii) 85.9 percent
(iv) I am informed that audited data to calculate this share is not available on a part-year basis.
- b. I do not know.
- c. Redirected to the Postal Service.
- d. (i) Confirmed.
(ii) Confirmed.

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(iii) Confirmed.

(1) The 80 percent figure was based on an estimate from staff in the Postal Service marketing department. Apparently, at the time, staff was unaware of the more detailed transaction data available from the Postal Service RPW system.

(2) Not applicable.