

**BEFORE THE  
POSTAL RATE COMMISSION**

---

**POSTAL RATE AND FEE CHANGES, 2006**

---

**DOCKET NO. R2006-1**

---

**FOLLOW-UP INTERROGATORY FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS MILLER  
(UPS/USPS-T21-20)  
(July 26, 2006)**

---

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

Miller: USPS-T-21-20.

Respectfully submitted,

---

John E. McKeever  
Phillip E. Wilson, Jr.  
Laura A. Biancke  
Attorneys for United Parcel Service

DLA Piper Rudnick Gray Cary US LLP  
One Liberty Place  
1650 Market Street. Suite 4900  
Philadelphia, PA 19103-7300  
(215) 656-3310  
(215) 656-3301 (FAX)  
and  
1200 Nineteenth Street, NW, 7th Floor  
Washington, DC 20036-2412  
(202) 861-3900

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS MILLER

UPS/USPS-T21-20. Refer to your response to UPS/USPS-T21-10, the section listed “DBMC Volume Percent Estimates (USPS-LR-L-46, page 7),” and Tables 7 and 8 in attachment f.pdf in USPS-LR-L-47. If any part below is not fully confirmed, explain in detail.

(a) Confirm that the FY2005 DBMC volumes listed (265,797,297 machinable pieces, 4,080,185 non-machinable pieces, and 51,785 oversize pieces) are the total for Parcel Select (DDU parcels, DSCF parcels and DBMC parcels).

(b) Confirm that there is not a non-machinable rate surcharge for DDU parcels.

(c) Confirm that the total of 4,080,185 non-machinable Parcel Select parcels includes only 439 non-machinable (non-oversize) DU parcels in the calculation.

(d) Confirm that in Tables 7 and 8:

- i. There are only 439 non-machinable (non-oversize) DDU parcels listed out of a total volume of DDU parcels of 202,924,596 million, or a non-machinable share of 0.000216%; and
- ii. There are no DDU parcel volumes listed for weight increments above 35 pounds.
- iii. If confirmed in whole or in part, provide (1) a corrected version of Tables 7 and 8 with corrected DDU volumes; (2) a calculation of the FY 2005 share of machinable, non-machinable and oversize DDU parcels and Parcel Select parcels; and (3) a corrected version of

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS MILLER

Tables 20 through 24 showing the cubic feet data for non-machinable  
DDU parcels.

- (e) Confirm that using the volumes listed in Tables 7 and 8:
- i. The machinable share of DSCF parcels is 96.10%  
(1,934,807/2,013,251);
  - ii. The non-machinable (non-oversize) share of DSCF parcels is 3.87%  
(77,984/2,013,251);
  - iii. The oversize share of DSCF parcels is 0.023% (460/2,013,251);
  - iv. The machinable share of DBMC parcels is 93.77%  
(60,942,727/64,991,420);
  - v. The non-machinable (non-oversize) share of DBMC parcels is 6.16%  
(4,001,762/64,991,420);
  - vi. The oversize share of DBMC parcels is 0.072% (46,931/64,991,420);
  - vii. The combined machinable share of DBMC and DSCF parcels is  
93.84% (62,877,534/67,004,671);
  - viii. The combined non-machinable (non-oversize) share of DBMC and  
DSCF parcels is 6.09% (4,079,746/67,004,671); and
  - ix. The combined oversize share of DBMC and DSCF parcels is 0.071%  
(47,391/67,004,671).
- (f) Confirm that the individual DBMC and DSCF machinable, non-machinable  
and oversize shares listed in part (e) above should be used on page 7 of USPS-LR-L-46  
for DBMC and DSCF parcels.

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS MILLER

(g) Confirm that for machinable, non-machinable and oversize shares DDU parcels on page 7 of USPS-LR-L-47 it would be best to use the combined DBMC and DSCF shares in the absence of further information regarding DDU parcels.