

**BEFORE THE  
POSTAL RATE COMMISSION**

---

**POSTAL RATE AND FEE CHANGES, 2006**

---

**DOCKET NO. R2006-1:**

---

**DESIGNATION BY UNITED PARCEL SERVICE OF  
WRITTEN CROSS-EXAMINATION OF THE  
UNITED STATES POSTAL SERVICE AND POSTAL SERVICE  
WITNESSES KELLEY (USPS-T-15), O'HARA (USPS-T-31),  
BOZZO (USPS-T-46), AND SPATOLA (USPS-T-49)  
(October 16, 2006)**

---

Pursuant to Presiding Officer's Ruling No. R2006-1/72 (September 28, 2006), United Parcel Service hereby designates as written cross-examination of the United States Postal Service and its witnesses the interrogatory responses listed on the attached sheet.

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

DESIGNATION BY UNITED PARCEL SERVICE  
OF WRITTEN CROSS-EXAMINATION OF  
THE UNITED STATES POSTAL SERVICE  
AND ITS WITNESSES

**WITNESS KELLEY (USPS-T-15)**

1. PRC/USPS-POIR No. 15, Question 1(e);

**WITNESS O'HARA (USPS-T-31)**

2. ABA-NAPM/USPS-T31-1 (errata);

**WITNESS BOZZO (USPS-T-46)**

3. PRC/USPS-POIR No. 9, Question 6 (revised);

**WITNESS SPATOLA (USPS-T-49)**

4. PRC/USPS-POIR No. 15, Question 1 (a)-(d), (f)-(j);

**INSTITUTIONAL**

5. UPS/USPS-4;
6. DBP/USPS-557 and 559;
7. PRC/USPS-POIR No. 11, Question 5.