

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0111**

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**POSTAL RATE AND FEES CHANGES, 2006**

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**Docket No. R2006-1**

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO  
UNITED STATES POSTAL SERVICE  
WITNESS JAMES M. KIEFER (PSA/USPS-T36-6)**

The Parcel Shippers Association (PSA) requests United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

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Dated: June 8, 2006

**PSA/USPS-T36-6.** Please refer to USPS-T-36, WP-STDREG-1 and USPS-T-13, Attachment 14.

- (a) Please confirm that your Standard Regular rate design spreadsheet assumes that 100% of Standard Regular parcels will be barcoded in TYAR. If not confirmed, please provide the correct figure and all of your underlying calculations.
- (b) In FY 2005, what percentage of Standard Regular parcels were barcoded?
- (c) Please provide your best estimate of the TYAR cost savings that will result from the increase in the proportion of Standard Regular parcels that will be barcoded and provide your underlying calculations.
- (d) Please confirm that the cost savings specified in subpart (c) of this interrogatory have not been incorporated into the Standard Regular parcel unit mail processing cost estimates in Attachment 14 to USPS-T-13. If not confirmed, please explain fully.
- (e) Assume that, in TYAR, the proportion of Standard Regular parcels that are barcoded will be the same as specified in subpart (b) of this interrogatory. How much higher would your estimate of Standard Regular parcel revenue be? Please provide your underlying calculations.
- (f) Please explain the basis for your assumption that, in TYAR, all Standard Regular parcels will be barcoded.