

**BEFORE THE  
POSTAL RATE COMMISSION**

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**POSTAL RATE AND FEE CHANGES, 2006**

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**DOCKET NO. R2006-1**

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**INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS PAGE  
(UPS/USPS-T23-2)  
(June 19, 2006)**

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatory directed to United States Postal Service witness Page: UPS/USPS-T23-2.

Respectfully submitted,

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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

INTERROGATORY OF UNITED PARCEL SERVICE TO  
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UPS/USPS-T23-2. Refer to library reference USPS-LR-L-59, Attachment 14A, page 18 of 19, entitled "Other Adjustments," and USPS-T-23, page 23, lines 11-12.

(a) Confirm that an adjustment to the projected cost for Parcel Post is needed because the Parcel Return Service (PRS) volume projected by witness Kiefer (USPS-T-37) is greater than witness Thress's (USPS-T-7) projection. If not confirmed, explain in detail.

(b) Confirm that witness Kiefer projects 7,678,927 more RDU pieces in the Test Year Before Rates than the volume projected by witness Thress. If not confirmed, explain in detail.

(c) Confirm that you multiply these 7,678,927 RDU pieces by \$0.4759 per piece to obtain the additional Parcel Post cost in the Test Year Before Rates related to PRS of \$3,654,567. If not confirmed, explain in detail.

(d) Confirm that this \$0.4759 per piece is obtained from library reference USPS-LR-L-46, page 1, and reflects the mail processing unit cost for RDU parcels. If not confirmed, explain in detail.

(e) Confirm that the proposed rate for RDU parcels is \$2.32 per piece as shown in library reference USPS-LR-82, WP-PP-32.

(f) Per pages 2 and 35-40 of library reference USPS-LR-L-46, confirm that RDU parcels incur storage, scanning, transportation, postage due, and carrier costs, in addition to the mail processing costs of \$0.4759 per piece. If confirmed, explain why these additional costs were not included in your Parcel Post final adjustment for PRS. If not confirmed, explain in detail.