

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

POSTAL RATE AND FEES CHANGES, 2006

Docket No. R2006-1

**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO
UNITED STATES POSTAL SERVICE
WITNESS JOHN P. KELLEY (PSA/USPS-T30-1)**

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 23, 2006

PSA/USPS-T30-1. Please refer to Table 1 on Page 4 of your testimony, which shows Test Year unit delivery costs by rate category. Please explain why the unit cost for First-Class Mail Presort parcels is higher than the unit cost for First-Class Mail single-piece parcels.