

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**INTERROGATORY OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MILLER
(UPS/USPS-T21-14)
(July 10, 2006)**

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

UPS/USPS-T21-14.

Respectfully submitted,

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UPS/USPS-T21-14. Refer to USPS-LR-L-46, pages 7 and 34.

(a) Confirm that the Parcel Select BY2005 volume of 276,623,565 in Row 9 on page 34 includes 6,692,322 PRS parcels from page 7. If not confirmed, explain in detail.

(b) Confirm that mailers enter the PRS parcels at any post office, station, branch, or collection box, with any letter carrier, as part of a collection run for other mail, or at any place designated by the postmaster for the receipt of mail (see DMM 507.11.1.4). If not confirmed, explain in detail.

(c) Refer to USPS-LR-L-86, workbook file LR86PPWIN.xls, worksheet "Data." Would PRS parcels be treated as dropship or non-dropship in the IOCS activity codes? Explain your answer in detail.