

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS PAGE
(UPS/USPS-T23-3 through 4)
(July 10, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness Page: UPS/USPS-T23-3 through 4.

Respectfully submitted,

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INTERROGATORIES OF UNITED PARCEL SERVICE TO
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UPS/USPS-T23-3. Refer to your response to UPS/USPS-T23-2(f).

Confirm that each of the following costs should also be included in the Parcel

Post final adjustment for the additional RDU pieces:

- (a) city carriers;
- (b) rural carriers; and
- (c) vehicle service drivers.
- (d) If part (a), (b), or (c) above is confirmed, provide an estimate of the costs per piece, including piggyback, which should be included.
- (e) If you cannot fully confirm part (a), (b), or (c) above, explain in detail.

UPS/USPS-T23-4. Refer to your response to PSA/USPS-T37-7(d);

USPS-LR-L-59, Attachment 14A, "Delivery Confirmation Worksheet," page 4 of 19; and USPS-T-7, Attachment A. Confirm that the "Grand Total" on the Delivery Confirmation Worksheet matches the Delivery Confirmation GFY volumes in USPS-LR-L-77, page K-12, for FY2005, and in USPS-T-7, Attachment A, for FY2006, FY2007, 2008 TYBR, 2007 TYAR, and 2008 TYAR.

- (a) If confirmed, explain which 2008 TYAR delivery confirmation volumes in the Delivery Confirmation Worksheet would increase if Parcel Post Electronic 2008 TYAR delivery confirmation volume were to decrease to 195,291,269 per your response to PSA/USPS-T37-7(d).
- (b) If not confirmed, explain in detail.