

**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 KIEFER
(UPS/USPS-T37-11)
(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 Kiefer:

UPS/USPS-T37-11.

Respectfully submitted,

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UPS/USPS-T37-11. Refer to your response to POIR No. 3, Question 19(b).

(a) What was the share of Non-PRS Parcel Select volume using no-fee

Delivery Confirmation in:

- i. FY2003?
- ii. FY2004?
- iii. FY2005?
- iv. FY2006 thus far?

(b) Explain why some non-PRS Parcel Select mailers do not use no-fee

Delivery Confirmation.

(c) Explain specifically what steps a non-PRS Parcel Select mailer must perform in order to use no-fee Delivery Confirmation.

(d) Refer to USPS-LR-L-77, pages H-1 and K-12.

- i. Confirm that the Parcel Select Electronic delivery confirmation transactions in FY2005 were 231,931,226. If not confirmed, explain in detail.
- ii. Confirm that Non-PRS Parcel Select volume in FY2005 was 269,931,243 (sum of 64,993,386 DBMC parcels, 2,013,256 DSCF parcels, and 202,924,601 DDU parcels). If not confirmed, explain in detail.
- iii. Confirm that Parcel Select Electronic delivery confirmation transactions in FY2005 represented 85.9% of the Parcel Select volume in FY2005.

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1. If confirmed, explain the reason for the difference between your 80% assumption and this 85.9% figure. If not confirmed, explain in detail.
2. If this 85.9% figure does not match the figure provided in response to part (a)iii above, explain in detail.