

**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 MILLER
(UPS/USPS-T21-15 through 18)
(July 11, 2006)**

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

UPS/USPS-T21-15 through 18.

Respectfully submitted,

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UPS/USPS-T21-15. Refer to the response to UPS/USPS-T37-2 and the Inter-BMC mail processing models in USPS-LR-L-46, pages 9-11. Explain in detail any differences there are between the mail processing steps listed for Inter-BMC parcels in USPS-LR-L-46 and the mail processing steps that take place for OMAS volume.

UPS/USPS-T21-16. Refer to USPS-LR-L-46, pages 7 and 8. Should the Cubic Feet per Parcel Post for R2006 (BY05) for the Machinable, NMO, and 108"-130" categories listed on page 8 multiplied by the total volumes for these three categories listed on page 7 match the total Parcel Post cubic feet for BY2005 listed on USPS-T-9, Exhibit USPS-9C, Cost and Revenue Analysis, Base Year 2005, page 3? If not, explain in detail.

UPS/USPS-T21-17. Refer to USPS-LR-L-46, page 7, columns [1] through [6]. Identify and provide all analyses and the underlying source data regarding the percentage of Parcel Post volume that is machinable, non-machinable (non-oversize), and oversize specifically for:

- (a) DBMC parcels;
- (b) DSCF parcels;
- (c) DDU parcels;
- (d) RBMC parcels; and
- (e) RDU parcels.

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Include in each answer a detailed explanation of the analytic steps used to derive these figures.

UPS/USPS-T21-18. Refer to USPS-LR-L-46, pages 12-14. Explain in detail any differences there are between the mail processing steps listed for Intra-BMC parcels in USPS-LR-L-46 and the mail processing steps that take place for Alaska Bypass pieces.