

**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 KIEFER
(UPS/USPS-T37-12 through 15)
(July 12, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness Kiefer: UPS/USPS-T37-12 through 15.

Respectfully submitted,

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UPS/USPS-T37-12. Refer to your response to UPS/USPS-T37-2.

- (a) What was the OMAS volume in FY2005?
- (b) What was the OMAS Parcel Post volume in FY2005?

UPS/USPS-T37-13. Refer to your response to UPS/USPS-T37-7(d), which references your response to UPS/USPS-T33-17 subparts (d) and (h) in Docket No. R2001-1. Your response to UPS/USPS-T33-17(d) in Docket No. R2001-1 was:

“This statement cannot be confirmed in the absolute. The Commission has accepted a range of practices for handling worksharing transportation costs, including applying a markup to separately derived transportation costs for destination-entry rate categories.”

Your response to UPS/USPS-T33-17(h) in Docket No. R2001-1 was:

“The Commission has recently shown its willingness to accept the transportation cost markup approach for independently derived destination-entry transport costs, in addition to the discount approach. My use of the transportation cost markup approach in this docket follows the procedure adopted by the Commission in its own Parcel Post workpapers in Docket No. R2000-1.”

Do you continue to be unaware of any other instances (per your response to UPS/USPS-T33-28 in Docket No. R2001-1) in which the Commission has applied the same markup to separately derived transportation costs for non-destination entry rate

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categories and destination-entry rate categories other than “the procedure adopted by the Commission in its own Parcel Post workpapers in Docket No. R2000-1”?

UPS/USPS-T37-14. Refer to USPS-LR-L-82, page WP-PP-18 and WP-PP-21. Confirm that the excess weight-related costs of balloon mail are recovered in the preliminary pound charges assigned to 1 through 70 pound pieces. If not fully confirmed, explain in detail.

UPS/USPS-T37-15. Refer to USPS-LR-L-82, WP-PP-19. Confirm that the pickup revenue in line [t] is the revenue received for the pickup by the Postal Service of intra-BMC and inter-BMC parcels. If not fully confirmed, explain in detail.

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