

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111**

POSTAL RATE AND FEES CHANGES, 2006

Docket No. R2006-1

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO
UNITED STATES POSTAL SERVICE
WITNESS L. PAUL LOETSCHER (PSA/USPS-T28-2)**

The Parcel Shippers Association (PSA) REQUESTS United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

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PSA/USPS-T28-2. Please refer to the Survey Instrument provided in USPS-LRL-33 and also to USPS-LR-L-33, Table 4.

(a) Please define "Parcel" preparation as the term is used in the survey instrument.

(b) Controlled to FY 2005 RPW values, how many Standard Mail pieces were recorded as both "Parcel" preparation and as being less than 1/4" thick?