

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSES OF POSTAL SERVICE WITNESS KIEFER
TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS KELLEY
(UPS/USPS-T15-1(d) & (e))**

The United States Postal Service hereby provides the responses of witness Kiefer to the following interrogatories of United Parcel Service, filed on July 7, 2006, and redirected from witness Kelley: UPS/USPS-T15-1(d) & (e).

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 20, 2006

RESPONSE OF POSTAL SERVICE WITNESS KIEFER (USPS-T-37)
TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS KELLEY

UPS/USPS-T15-1. Refer to USPS-T-15, page 8; USPS-T-9, page C-16; and USPS-LR-L-77, page H-1.

- (d) Confirm that Alaska Bypass revenue for Parcel Post was \$17,085,340 in BY2005. If not confirmed, explain in detail.
- (e) Explain in detail why \$17,085,340 of BY2005 Alaska Bypass revenue was assigned to Parcel Post if only \$7,773,000 of BY2005 Alaska nonpreferential air costs were attributed to Parcel Post.

RESPONSE

- d. Confirmed.
- e. Alaska Bypass pieces pay Parcel Post Intra-BMC rates. The revenues assigned to Parcel Post reflect the postage actually paid by Alaska Bypass mail at Intra-BMC Parcel Post rates. Please see also my response to UPS/USPS-T37-9(e).