

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MICHAEL W. MILLER TO INTERROGATORY OF
UNITED PARCEL SERVICE (UPS/USPS-T21-9) [ERRATUM]
(August 1, 2006)

The United States Postal Service hereby provides the revised response of Postal Service witness Miller (USPS-T-21) to interrogatory UPS/USPS-T21-9. Witness Miller's original response to part (d) of that interrogatory incorrectly indicated that Library Reference USPS-LR-L-47 uses "the sum of the length and girth exceeds 84 inches" as a criterion for classifying a parcel as nonmachinable. Witness Miller's response to part (d) is therefore being revised to indicate only those criteria that are actually used by USPS-LR-L-47 to classify a parcel as nonmachinable.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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UPS/USPS-T21-9. Refer to the Attachment to the response to UPS/USPS-T21-4 listing RPW volume data for inter-BMC and intra-BMC parcels in FY2005.

- (a) Confirm that the number of non-machinable intra-BMC pieces in Y2005 was 6,146,976 (mail categories 4190, 510BEBAAAM, and 10BFBAAM), representing 18% of the intra-BMC volume in FY2005 of 34,107,784. If not confirmed, explain in detail.
- (b) Confirm that the number of non-machinable inter-BMC pieces in FY2005 was 10,175,287 (mail categories 4135, 4150, 4180, 510FEBAAM, 510FFBAAM, 510HEBAAM, 510HFBAAM, 510DEBAAM, and 510DFBAAM), representing 13% of the inter-BMC volume in FY2005 of 77,073,589. If not confirmed, explain in detail.
- (c) Refer to library reference UPS-LR-L-82, WP-PP-4 and WP-PP-5, listing the FY2005 billing determinants for intra-BMC and inter-BMC Parcel Post. Confirm that 18.9% of intra-BMC pieces and 13.2% of inter-BMC pieces are listed as nonmachinable. If not confirmed, explain in detail.
- (d) Refer to library reference USPS-LR-L-46, page 7. Confirm that 94.7% of intra-BMC pieces and 94.7% of inter-BMC parcels are listed as machinable in FY2005 and the source is USPS-LR-L-47.
 - i. If confirmed, explain the reason for the mismatch between the intra-BMC and inter-BMC machinable/non-machinable shares from the billing determinants and calculated from the RPW data discussed in parts (a)-(c) of this interrogatory above, in comparison to the estimates contained on page 7 of USPS-LR-L-46.
 - ii. If not confirmed, explain in detail.

RESPONSE:

(a) Confirmed.

(b) Confirmed.

(c) Confirmed.

(d) Confirmed. It is my understanding that in the RPW system any nonrectangular parcel is classified as nonmachinable. In USPS-LR-L-47, parcels are classified as machinable unless one of the following attributes is present: the

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weight exceeds 35 pounds or the length exceeds 34 inches (please note that the narrative in USPS-LR-L-47 indicating that a “length + girth > 84 inches” criterion is also used is incorrect). Given that these attributes more accurately reflect those of nonmachinable parcels, the machinable and nonmachinable Parcel Post volume estimates contained in USPS-LR-L-47 are regarded to be more compatible with the use in the cost models than those contained in RPW.