

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MICHAEL W. MILLER TO INTERROGATORY OF  
UNITED PARCEL SERVICE (UPS/USPS-T21-19(a))  
(August 1, 2006)

The United States Postal Service hereby provides the response of Postal Service witness Miller (USPS-T-21) to interrogatory UPS/USPS-T21-19(a), filed on July 26, 2006. Parts (b) through (d) have been redirected to witness Kiefer (USPS-T-37).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**UPS/USPS-T21-19.** Refer to your response to UPS/USPS-T21-9(d).

(a) Confirm that the parcel characteristics (“the weight exceeds 35 pounds, the length exceeds 34 inches, or the sum of the length and girth exceeds 84 inches”) used to classify non-machinable parcels in USPS-LR-L-47 correspond with the parcel characteristics used to assess mailers a non-machinable rate surcharge for Parcel Post listed in Domestic Mail Manual, § 101.7.2. If not confirmed, explain in detail.

(b) Confirm that the parcel characteristic (“nonrectangular”) used to classify non-machinable parcels in Section H of USPS-LR-L-77 (Billing Determinants, Fiscal Year 2005), which is used as the basis for the billing determinants listed in USPS-LR-L-82, WP-PP-4 and WP-PP-5, does not accurately correspond with the parcel characteristics used to assess mailers a non-machinable rate surcharge for Parcel Post listed in Domestic Mail Manual, § 101.7.2. If not confirmed, explain in detail.

(c) Confirm that an incorrect estimate of the share of non-machinable parcels can impact the RPW Revenue Adjustment Factors for Parcel Post listed in Section H-1, page 10 of 10, USPS-LR-L-77, and derived from the Calculated Revenues listed in Section H-1, pages 7-9 of 10, USPS-LR-L-77. If not confirmed, explain in detail.

(d) Confirm that the non-machinable shares that are calculated in USPS-LR-L-47 should be used in place of the non-machinable shares in the billing determinants in Section H-1, USPS-LR-L-77. If not confirmed, explain in detail.

**RESPONSE:**

(a) Please see my revised response to UPS/USPS-T21-9(d), which indicates that USPS-LR-L-47 does not use “the sum of the length and girth exceeds 84 inches” as a criterion for classifying nonmachinable parcels. The criteria that USPS-LR-L-47 uses to classify nonmachinable parcels (“the weight exceeds 35 pounds” or “the length exceeds 34 inches”) are contained in Domestic Mail Manual, § 101.7.2. It should be noted that the analysis contained in USPS-LR-L-47 does not consider all the nonmachinable parcel criteria included in Domestic Mail Manual, § 101.7.2.

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(b) Redirected to witness Kiefer (USPS-T-37).

(c) Redirected to witness Kiefer (USPS-T-37).

(d) Redirected to witness Kiefer (USPS-T-37).