

**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 BOZZO
(UPS/USPS-T12-48 and 49)
(August 7, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness

Bozzo: UPS/USPS-T12-48 and 49.

Respectfully submitted,

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UPS/USPS-T12-48. For each of the following functions, provide the total labor hours from the MODS database for every quarter from FY1999 Q1 through FY2005 Q4 and for each IDNUM listed in vv9905.xls of Section1/data of USPS-LR-L-56:

- (a) 0, Operations Support;
- (b) 1, Mail Processing;
- (c) 2, Delivery Services;
- (d) 3, Maintenance;
- (e) 4, Customer Services;
- (f) 5, Finance;
- (g) 6, Human Resources;
- (h) 7, Customer Services Support;
- (i) 8, Administration;
- (j) 9, Training; and
- (k) Special Operations.

UPS/USPS-T12-49. For each of the following LDCs, provide total labor hours and total labor costs from the National Workhours Reporting System for every quarter from FY1999 Q1 through FY2005 Q4 and for each IDNUM listed in vv9905.xls of Section1/data of USPS-LR-L-56:

- (a) 0, Operations–Support;
- (b) 1, Operations–Mail Processing;

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- (c) 2, Operations–Delivery Services;
- (d) 3, Operations–Maintenance/Transportation;
- (e) 4, Operations–Customer Service;
- (f) 5, Finance;
- (g) 6, Human Resources;
- (h) 7, Customer Service and Sales;
- (i) 8, Administration (Field);
- (j) 8, Headquarters General Management (HQ and Related Units); and
- (k) 9, Training.