

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1:

**DESIGNATION BY UNITED PARCEL SERVICE OF
WRITTEN CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS KIEFER
(USPS-T-37)
(August 8, 2006)**

United Parcel Service hereby designates as written cross-examination of United States Postal Service witness Kiefer (USPS-T-37) the interrogatory responses of Dr. Kiefer listed on the attached sheet. Because witness Kiefer refers to an interrogatory response from Docket No. R2001-1 in his response to UPS/USPS-T37-5(b), UPS has attached the R2001-1 interrogatory response by agreement with the Postal Service.

Respectfully submitted,

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DESIGNATION BY UNITED PARCEL SERVICE
OF WRITTEN CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS KIEFER (USPS-T-37)

1. UPS/USPS-T37-1, 2, 3(a)-(c), and (e), 4, 5, 8, 9, 10, 11(a), (b), and (d), 12, 13, 14, and 15;
2. UPS/USPS-T15-1(d) and (e), redirected from witness Kelley (USPS-T-15);
3. UPS/USPS-T21-19(b) and (c), redirected from witness Miller (USPS-T-21);
4. PSA/USPS-T37-1, 3, and 7(c);
5. POIR No. 3, Questions 18(a), 19, 20, 23, and 28; and
6. POIR No. 4, Questions 18 and 22.