

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
PARCEL SHIPPERS ASSOCIATION WITNESS MCALPIN
(USPS/PSA-T2-1-2)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Parcel Shippers Association witness McAlpin: USPS/ PSA-T2-1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/PSA-T2-1 Please refer to the table on page 5 of your testimony.

- (a) Please provide all the backup calculations and assumptions behind this table, including the weights of the pieces used, their zone distributions, and which rate schedules were used to derive the prices shown in the table.
- (b) Do any of the USPS prices shown in the table contain a PRS component? If so, please explain fully.
- (c) Do the UPS prices shown in the table include any charges for pickup? If so, please provide the pickup charges separately for each rate cell in the table and any underlying assumptions.

USPS/PSA-T2-2 Please refer to the table on page 5 of your testimony and the list of various levels of UPS return service shown on pages 6 and 7. What level of UPS return service (from the list on pages 6 and 7) is represented by the UPS prices shown in the table on page 5? If the price shown in the table represents an average or composite of different service levels, please give the shares of each service level in the average or composite. If the service level varies by row in the table, please specify the service level shares for each row.