

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  
UNITED PARCEL SERVICE WITNESS LUCIANI  
(USPS/UPS-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 United Parcel Service witness Luciani: USPS/U PS-T2-1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**USPS/UPS-T2-1** Please refer to page 13, lines 5-8 of your testimony.

- (a) Please explain whether it is your view that the principles of efficient component pricing (ECP) should be followed in establishing prices regardless of the impact of the prices so established on the Postal Service's customers?
- (b) To your knowledge has the Commission ever recommended pricing that imposes constraints on the move toward more ECP-compatible pricing to achieve one or more non-cost pricing goals established in the Postal Reorganization Act?

**USPS/UPS-T2-2** Please refer to page 19, lines 12-4 of your testimony. Other than the fact that the Commission recommended a 90 percent passthrough in a previous case, please explain why the specific 90 percent passthrough figure is the appropriate figure to use in this case.