

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111**

POSTAL RATE AND FEES CHANGES, 2006

Docket No. R2006-1

**FOURTH INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO
UNITED STATES POSTAL SERVICE
WITNESS JAMES M. KIEFER (PSA/USPS-T36-8)**

The Parcel Shippers Association (PSA) REQUESTS United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

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Dated: July 14, 2006

PSA/USPS- T36-8. Please refer to your response to PSA/USPS- T37 -2 where you confirmed that "the Savings Passthrough shown in this workpaper is calculated by dividing the total revenue difference between PRS parcels and those parcels if mailed as intra-BMC parcels by the corresponding total cost difference. If not confirmed, please explain fully." Do you believe that dividing the total revenue difference between Standard Mail Regular parcels and Standard Mail Regular flats by the corresponding total cost difference is a reasonable way to calculate the effective passthrough of the Standard Mail Regular flat-parcel cost difference? Please explain your response fully.