

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER  
TO INTERROGATORY OF UNITED PARCEL SERVICE  
(UPS/USPS-T36-1(a))

The United States Postal Service hereby files the response of witness Kiefer to above-listed interrogatory part, filed on July 14, 2006. Interrogatory part UPS/USPS-T36-1(b) has been redirected to the Postal Service.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Nan K. McKenzie

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July 28, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER TO  
INTERROGATORY OF UNITED PARCEL SERVICE

**UPS/USPS-T36-1.**

- (a) Please confirm that, under the rates you have proposed, a Standard Mail Regular nonmachinable parcel that has been presorted to 3-digit ZIP Codes will receive a lower rate than a comparable machinable parcel sorted to BMCs.
  - (b) If the rate relationship described in subpart (a) is confirmed, please indicate whether the Postal Service intends to adopt rules to prevent machinable parcels from being made nonmachinable in order to benefit from the lower rates.
- .

**RESPONSE:**

- a. Confirmed.
- b. Redirected to the Postal Service.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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Nan K. McKenzie

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Washington, D.C. 20260-1137  
July 28, 2006