

**BEFORE THE  
POSTAL RATE COMMISSION**

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**POSTAL RATE AND FEE CHANGES, 2006**

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**DOCKET NO. R2006-1**

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**INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS MAYES  
(UPS/USPS-T25-10)  
(July 13, 2006)**

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatory directed to United States Postal Service witness Mayes:

UPS/USPS-T25-10.

Respectfully submitted,

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UPS/USPS-T25-10. Refer to USPS-LR-L-89, Attachment B, pages 1-5.

(a) Confirm that 1-pound Parcel Post pieces were treated as 2-pound pieces for purposes of calculating total cubic feet for Intra-BMC, Inter-BMC, and Parcel Select parcels. If not confirmed, explain in detail.

(b) Refer to USPS-LR-L-82, WP-PP-8 and WP-PP-10. Confirm that 1-pound Parcel Post pieces were treated as 1-pound pieces for purposes of calculating total cubic feet for Intra-BMC, Inter-BMC and Parcel Select parcels. If not confirmed, explain in detail.

(c) Explain in detail the reasons for the different approaches in estimating the cubic feet for 1-pound Parcel Post pieces in these two library references.