

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 MAYES TO  
INTERROGATORY OF THE UNITED PARCEL SERVICE  
(UPS/USPS-T25-10)

The United States Postal Service hereby files the response of Witness Mayes to the above-listed interrogatory, filed on July 13, 2006.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3089; Fax -5402  
July 27, 2006

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

**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.

**Response:**

(a) Confirmed.

(b) Confirmed.

(c) The one-pound pieces had been excluded from the regression analyses developed in USPS-LR-L-90 (because  $\ln(1)=0$ ), meaning that they were outside of the sample range of estimates. In addition, because the creation of separate rates for one- and two-pound pieces is relatively recent, and the volume share of the one-pound pieces was relatively small, the fact that separate cube estimates had not been developed for the one-pound pieces was overlooked. A revised Attachment B for USPS-LR-L-89 which incorporates separate cube estimates for the one-pound pieces has been filed.

## **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.

---

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
July 27, 2006