

**BEFORE THE  
POSTAL RATE COMMISSION**

---

**POSTAL RATE AND FEE CHANGES, 2006**

---

**DOCKET NO. R2006-1**

---

**INTERROGATORY FROM UNITED PARCEL SERVICE TO  
THE UNITED STATES POSTAL SERVICE  
(UPS/USPS-4)  
(August 18, 2006)**

---

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

Respectfully submitted,

---

John E. McKeever  
Phillip E. Wilson, Jr.  
Laura A. Biancke  
Attorneys for United Parcel Service

DLA Piper Rudnick Gray Cary US LLP  
One Liberty Place  
1650 Market Street, Suite 4900  
Philadelphia, PA 19103-7300  
(215) 656-3310  
(215) 656-3301 (FAX)  
and  
1200 Nineteenth Street, NW, 7th Floor  
Washington, DC 20036-2412  
(202) 861-3900

INTERROGATORY OF UNITED PARCEL SERVICE TO  
THE UNITED STATES POSTAL SERVICE

UPS/USPS-4. Refer to your response to UPS/USPS-T15-2, redirected from witness Kelley. In that response, the Postal Service provided a table containing estimates of the pieces, pounds, and cubic feet of mail, by mail class, transported under the FedEx contract during FY 2005.

(a) Do the estimates in that response include both the Night-turn mode and the Day-turn mode, or only the Day-turn mode?

(b) If the estimates include both the Night-turn and the Day-turn, please provide estimates of the pieces, pounds, and cubic feet of mail, by mail class, transported on the Day-turn mode, and separate estimates of the pieces, pounds, and cubic feet of mail, by mail class, transported on the Night-turn mode.

(c) Provide the same data as is requested in paragraph (b), above, separately for FY 2002, FY 2003, and FY 2004.