

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 COOMBS
TO INTERROGATORY OF UPS (UPS/USPS-T44-1)
(July 26, 2006)

The United States Postal Service hereby provides the response of witness
Coombs to the following interrogatory of UPS, filed on July 12, 2006: UPS/USPS-T44-

1.

Each 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

Eric P. Koetting

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July 26, 2006

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UPS/USPS-T44-1.

Refer to your response to UPS/USPS-T37-6 and USPS-LRL-89, Attachment B, page 2.

- (a) Identify and provide all studies or analyses that examine the differences in city carrier and rural carrier cost per piece for the delivery of Priority Mail and/or Parcel Post pieces that vary by:
 - i. Weight
 - ii. Density
- (b) Do city and rural carrier costs for the delivery of Priority and/or Parcel Post pieces increase as weight increases, all else equal? Explain your answer in detail.
- (c) Do city and rural carrier costs for the delivery of Priority Mail and/or Parcel Post pieces increase as cubic feet per piece increases, all else equal? Explain your answer in detail.

RESPONSE:

- a. It is my understanding that no studies or analyses have been conducted that examine the effect of weight or density on city delivery costs or rural costs for Priority Mail or Parcel Post.
- b. I don't address costs in my testimony, but if you are asking me if Priority or Parcel Post pieces that weigh more tend to be handled differently operationally, then I would answer yes. For example, Priority Mail and Parcel Post pieces that weigh more than two pounds, and/or cannot fit into a carrier's satchel or cart, are handled on a separate trip. But whether such differences are generally due to weight, or other factors, such as size or shape, which may be related to weight, I have had no occasion to study, and I have no opinion.

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- c. I don't address costs in my testimony, but if you are asking me if Priority or Parcel Post pieces that larger are handled differently operationally, then I would answer yes. For example, Priority Mail and Parcel Post pieces that weigh more than two pounds, and/or cannot fit into a carrier's satchel or cart are handled on a separate trip which increases costs. But whether such differences are generally due to size, or other factors, such as weight or shape or density, which may be related to size, I have had no occasion to study, and I have no opinion.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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