

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

**Postal Rate and Fee Changes, 2006            )    Docket No. R2006-1**

**FIRST INTERROGATORIES  
OF GROWING FAMILY, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS MILANOVIC  
GF/USPS –T9-1  
(May 26, 2006)**

Pursuant to Rules 25, 26 and 27 of the Rules of Practice, Growing Family, Inc., hereby submits interrogatories and requests for production of documents to United States Postal Service witness Milanovic. Growing Family asks that, in responding to these requests, the Postal Service follow the guidelines set forth below. If any request is deemed burdensome or seeks information that the respondent reasonably believes is confidential, please contact the undersigned counsel for Growing Family to discuss possible limitations or alternative requests.

If the witness to whom these interrogatories are directed is unable to provide a complete response, please provide a response by another witness, and if no such witness is capable of providing a complete response, please submit an “institutional” response. If an “institutional” response is provided, please provide the name or names of the persons responsible for the response.

If information requested is not available in the exact format or level of detail requested, please provide responsive material in such different format or level of detail as is available.

If a privilege or confidentiality is claimed with respect to any information that is responsive to these requests, please describe the precise nature of any privilege claimed and describe information being withheld, including sufficient detail to enable a reasonable assessment of the claim of privilege or confidentiality.

If any information that would have been provided in response to these requests has been destroyed, please describe such data or documents and explain the circumstances under which they were destroyed.

Respectfully submitted,

/s/ David R. Straus  
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**GF/USPS-T9-1.** a. Please confirm that Exhibit No. USPS-9A for FY 2005 shows volume variable city carrier costs (component 257) attributed to COD of \$913,000 and volume variable rural carrier costs (component 260) attributed to COD of \$1,835,000. If you cannot so confirm, please provide the correct dollar amounts.

b. Please provide a breakdown of the number of COD packages and the number of COD claims paid for FY 2005 into city carrier and rural carrier segments.