

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
MICO MILANOVIC (USPS-T-9) TO INTERROGATORY OF
GROWING FAMILY, INC. (GF/USPS-T9-1)
(June 9, 2006)

The United States Postal Service hereby provides the responses of witness Mico Milanovic (USPS-T-9) to the following interrogatory of Growing Family, Inc., filed on May 26, 2006:

GF/USPS-T9-1

The 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

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RESPONSE OF USPS WITNESS MILANOVIC (USPS-T-9) TO
INTERROGATORY OF GROWING FAMILY, INC.

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.

RESPONSE:

a. Confirmed that Exhibit No. USPS-9A for FY 2005 shows volume variable costs for city carrier street activity attributed to COD (component 257) of \$913,000, and volume variable costs for rural carriers attributed to COD (component 260) of \$1,835,000.

b. It is my understanding that a breakdown of the number of COD packages and the number of COD claims into city carrier and rural carriers is not available.

However, the total number of COD packages in FY2005 was 1,495,968 pieces, as shown in LR-L-123, WP-6, sponsored by witness Berkeley (USPS-T-39). It is my understanding that the total number of COD insured claims paid in FY2005 was 16,757.

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.

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