

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MAYES
(UPS/USPS-T25-1 through 5)
(June 13, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness Mayes: UPS/USPS-T25-1 through 5.

Respectfully submitted,



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UPS/USPS-T25-1. Refer to library reference USPS-LR-L-89, page 9.

- (a) Confirm that Intra-BMC parcels are assumed to incur 1.95 legs of local transportation. If not confirmed, explain in detail.
- (b) Confirm that Inter-BMC parcels are assumed to incur 1.85 legs of local transportation. If not confirmed, explain in detail.
- (c) Confirm that "local transportation" represents transportation from the origin AO to the origin SCF and from the destination SCF to the destination DU. If not confirmed, explain in detail.

UPS/USPS-T25-2. Provide and describe in detail any studies regarding the volume of Inter-BMC and Intra-BMC parcels that are entered at the origin SCF.

UPS/USPS-T25-3. Refer to library reference USPS-LR-L-46, page 7.

- (a) Confirm that 5.3% of Inter-BMC parcels and 3.8% of intra-BMC parcels are "retail". If not confirmed, explain in detail.
- (b) Define what is meant by "retail" in this context.

UPS/USPS-T25-4. Refer to library reference USPS-LR-L-88, Appendix A, Table 1. Confirm that for Standard Mail, 15.15% of the volume (measured by weight) is entered at the origin SCF, 4.0% at the origin BMC, and 0.26% at the origin AO. If not confirmed, explain in detail.

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UPS/USPS-T-25-5. Explain in detail why it would not be more appropriate to assume that only 5.3% of Inter-BMC parcels and 3.8% of Intra-BMC parcels incur a local leg of transportation from the origin AO to the origin SCF.