

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**INTERROGATORY OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS PAGE
(UPS/USPS-T23-1)
(June 15, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatory directed to United States Postal Service witness Page: UPS/USPS-T23-1.

Respectfully submitted,

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UPS/USPS-T23-1. Refer to library reference USPS-LR-L-59, Attachment 14A, page 14 of 19, entitled "Inputs from Other Cost Models."

(a) Confirm that the figures on this page are "Test Year Unit Costs from Cost Models." If not confirmed, explain in detail.

(b) Identify and provide the specific source for the City Carrier costs for the individual Parcel Post rate categories (Inter-BMC, Intra-BMC, DBMC, DSCF and DDU).

(c) Identify and provide the specific source for the Rural Carrier costs for the individual Parcel Post rate categories (Inter-BMC, Intra-BMC, DBMC, DSCF and DDU).