

**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 KIEFER
(UPS/USPS-T37-9 through 10)
(July 7, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness Kiefer: UPS/USPS-T37-9 through 10.

Respectfully submitted,

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UPS/USPS-T37-9. Refer to library reference USPS-LR-L-82, WP-PP-1 and WP-PP-19.

(a) Confirm that Alaska Bypass mail volume in the TYBR is 1,671,068 pieces. If not confirmed, explain in detail. Also, provide the RPW data used to calculate this figure per note "6e".

(b) Confirm that Alaska Bypass revenue is assumed to be 12.081% of Non-Alaska Intra-BMC revenue. If not confirmed, explain in detail. Also, provide the RPW data used to calculate this figure per note "5a-b".

(c) Confirm that Alaska Bypass revenue in the TYBR is calculated to be \$19,048,805. If not confirmed, explain in detail.

(d) Confirm that the TYBR cost for Alaska non-preferential air is \$1,063,000 (per library reference USPS-LR-L-89, Attachment B, page 8, row 3). If not confirmed, explain in detail.

(e) Explain in detail the reasons for the significant differential between the Alaska Bypass revenue that you estimate and the cost for Alaska non-preferential air.

UPS/USPS-T37-10. Refer to your response to PSA/USPS-T37-1 and PSA/USPS-T37-3. Provide the TYAR average cost per piece and TYAR average revenue per piece, and your underlying calculations, for:

- (a) Inter-BMC parcels;
- (b) DBMC parcels;
- (c) DSCF parcels; and

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- (d) Intra-BMC Alaska Bypass parcels.