

**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-T25-6 through 8)
(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

Mayes: UPS/USPS-T25-6 through 8.

Respectfully submitted,

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UPS/USPS-T25-6. Refer to library reference USPS-LR-L-89, Attachment B, pages 8 and 9.

(a) Confirm that Alaska non-preferential air costs in the test year are \$1,063,000. If not confirmed, explain in detail.

(b) Confirm that the Alaska non-preferential air costs are assigned to the transportation costs for intra-BMC and inter-BMC parcels, and not assigned to the transportation costs for Parcel Select parcels. If not confirmed, explain in detail.

(c) Confirm that in Docket No. R2005-1, USPS-LR-K-89, Attachment B, page 8, the Alaska non-preferential air costs in the test year were \$4,615,000. If not confirmed, explain in detail.

(d) Confirm that in Docket No. R2001-1, library reference LR-J-64, Attachment B, page 8, the Alaska non-preferential air costs in the test year were \$9,002,000. If not confirmed, explain in detail.

(e) Confirm that in Docket No. R2000-1, USPS-T-26, Attachment M, page 2, the Alaska non-preferential air costs in the test year were \$9,440,000. If not confirmed, explain in detail.

(f) Explain in detail the reasons for the material decrease in Alaska non-preferential air costs in this docket in comparison to Docket Nos. R2005-1, R2001-1 and R2000-1.

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UPS/USPS-T25-7. Refer to library reference USPS-LR-L-89, Attachment B, pages 8 and 9.

(a) Confirm that Plantload costs in the test year are \$16,000. If not confirmed, explain in detail.

(b) Confirm that the Plantload costs are assigned to the transportation costs for intra-BMC and inter-BMC parcels, and not assigned to the transportation costs for Parcel Select parcels. If not confirmed, explain in detail.

(c) Confirm that in Docket No. R2005-1, USPS-LR-K-89, Attachment B, page 8, the Plantload costs in the test year were \$11,000. If not confirmed, explain in detail.

(d) Confirm that in Docket No. R2001-1, USPS-LR-J-64, Attachment B, page 8, the Plantload costs in the test year were \$2,490,000. If not confirmed, explain in detail.

(e) Confirm that in Docket No. R2000-1, USPS-T-26, Attachment M, page 2, the Plantload costs in the test year were \$2,095,000. If not confirmed, explain in detail.

(f) Explain in detail the reasons for the material decrease in Plantload costs in this docket and Docket No. R2005-1 in comparison to Docket Nos. R2001-1 and R2000-1.

UPS/USPS-T25-8. Refer to the response to UPS/USPS-T37-2 and to library reference USPS-LR-L-89.

(a) What were the OMAS-related transportation costs for Parcel Post in FY2005?

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(b) What are the projected OMAS-related transportation costs for Parcel Post in the TYBR?

(c) Explain in detail where the OMAS-related transportation costs for Parcel Post are accounted for in USPS-LR-L-89, Attachment B.