

**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 BOZZO
(UPS/USPS-T46-1 and 2)
(July 11, 2006)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following interrogatories directed to United States Postal Service witness

Bozzo: UPS/USPS-T46-1 and 2.

Respectfully submitted,

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UPS/USPS-T46-1. Refer to USPS-T46, page 28, Table 4. Provide a complete description of the criteria you used in preparing this table to classify tallies as “Direct Tallies,” “Mixed Tallies,” “Mixed Container Tallies,” and “Not-Handling Tallies,” including references to specific IOCS questions.

UPS/USPS-T46-2. Refer to USPS-T46, page 29, where you state that “[t]he automatic prompting for mailpiece selection in several branches of the redesigned IOCS-CODES software appears to account for much of the direct tally increase in mail processing.” Describe completely any differences in the nature or extent of the automatic prompting referred to in this passage depending upon whether the sampled employee is working with the letter, flat or parcel/bundle mailstream.