

**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 PIFER
(UPS/USPS-T18-1)
(July 11, 2006)**

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

UPS/USPS-T18-1.

Respectfully submitted,

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UPS/USPS-T18-1. Refer to USPS -LR-L-72, file "IC3-2.xls," BY 2005 Incremental Cost, C/S 3.2 Window Service, which uses output from USPS-LR-L-5, file "CS03.xls," Base Year 2005 – USPS Version, C/S 3 – Clerks & Mailhandlers-CAGs A-J.

(a) Provide the actual sources for each of the following instances in which values found in "IC3-2.xls" do not match or cannot be found among the contents of "CS03.xls:"

- i. The values for the "Acceptance Total" cost pool, which cannot be found in "CS03.xls." For example, in "IC3-2.xls," "Inputs" worksheet, the value for First-Class Mail "Single Piece Letters" in the "Acceptance Total" column, line 2, is \$149,198 (\$000), whereas in "CS03.xls," the "Outputs to Incremental Cost Model" worksheet contains no column labeled "Acceptance Total."
- ii. The "Non-Acceptance VVC" cost pool in "IC3-2.xls," "Inputs" worksheet, where the value for Priority Mail in the "Non-Acceptance VVC" column, line 7, is \$19,073 (\$000), but the value identified in "CS03.xls," "Outputs to Incremental Cost Model" worksheet, column 8, line 7, is \$19,106 (\$000).
- iii. The "Non-Acceptance VVC" cost pool in "IC3-2.xls," "Inputs" worksheet, where the data source is given as "WS 3.2.1 C14," but the data source identified in "CS03.xls," "Outputs to Incremental Cost Model" worksheet, column 8, line 7, is "WS 3.2.1 C12."

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(b) Confirm that values in "IC3-2.xls" which are documented as coming from "CS03.xls" (1) are not all found in "CS03.xls;" (2) do not all match the values contained in "CS03.xls;" and (3) sometimes cite different data sources.

(c) If any part of (b) is confirmed, provide the actual sources for the values contained "IC3-2.xls."

(d) If any part of (b) is confirmed, explain in detail the reasons for the discrepancies between the contents of "IC3-2.xls" and the contents of "CS03.xls."

(e) If you do not fully confirm (b), explain in detail.

(f) If values found in "IC3-2.xls" are drawn from a version of "CS03.xls" that differs from the one contained in USPS-LR-L-5, provide a copy of the correct version of "CS03.xls."