

**BEFORE THE  
POSTAL RATE COMMISSION**

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**POSTAL RATE AND FEE CHANGES, 2006**

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**DOCKET NO. R2006-1**

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**INTERROGATORY OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS COOMBS  
(UPS/USPS-T44-1)  
(July 12, 2006)**

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

Coombs: UPS/USPS-T44-1.

Respectfully submitted,

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John E. McKeever  
Phillip E. Wilson, Jr.  
Laura A. Biancke  
Attorneys for United Parcel Service

DLA Piper Rudnick Gray Cary US LLP  
One Liberty Place  
1650 Market Street, Suite 4900  
Philadelphia, PA 19103-7300  
(215) 656-3310  
(215) 656-3301 (FAX)  
and  
1200 Nineteenth Street, NW, 7th Floor  
Washington, DC 20036-2412  
(202) 861-3900

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UPS/USPS-T44-1. Refer to your response to UPS/USPS-T37-6 and USPS-LR-L-89, Attachment B, page 2.

(a) Identify and provide all studies or analyses that examine the differences in city carrier and rural carrier cost per piece for the delivery of Priority Mail and/or Parcel Post pieces that vary by:

- i. Weight
- ii. Density (cubic feet per piece)

(b) Do city and rural carrier costs for the delivery of Priority Mail and/or Parcel Post pieces increase as weight increases, all else equal? Explain your answer in detail.

(c) Do city and rural carrier costs for the delivery of Priority Mail and/or Parcel Post pieces increase as cubic feet per piece increases, all else equal? Explain your answer in detail.