

**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 THRESS  
(UPS/USPS-T7-1 through 4)  
(July 12, 2006)**

---

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

Thress: UPS/USPS-T7-1 through 4.

Respectfully submitted,

---

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

INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS THRESS

UPS/USPS-T7-1. (a) Provide for BY 2005 (i) the volume of Priority Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(b) Provide for BY 2005 (i) the volume of Priority Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide for Priority Mail the volume that was sent by businesses to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide for Priority Mail the volume that was sent by businesses to residences in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide for Priority Mail the volume that was sent by residential customers to residences in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide for Priority Mail the volume that was sent by residential customers to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T7-2. (a) Provide for BY 2005 (i) the volume of Express Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by

INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS THRESS

businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

(b) Provide for BY 2005 (i) the volume of Express Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide the volume of Express Mail that was sent by businesses to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide the volume of Express Mail that was sent by businesses to residential customers in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide the volume of Express Mail that was sent by residential customers to residences in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide the volume of Express Mail that was sent by residential customers to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T7-3. (a) Provide for BY 2005 (i) the volume of Bound Printed Matter that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS THRESS

(b) Provide for BY 2005 (i) the volume of Bound Printed Matter that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide the volume of Bound Printed Matter that was sent by businesses to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide the volume of Bound Printed Matter that was sent by businesses to residential customers in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide the volume of Bound Printed Matter that was sent by residential customers to residences in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide the volume of Bound Printed Matter that was sent by residential customers to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T7-4. (a) Provide for BY 2005 (i) the volume of Media Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

(b) Provide for BY 2005 (i) the volume of Media Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If

INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS THRESS

this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide the volume of Media Mail that was sent by businesses to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide the volume of Media Mail that was sent by businesses to residential customers in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide the volume of Media Mail that was sent by residential customers to residences in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide the volume of Media Mail that was sent by residential customers to businesses in BY 2005. If this information is not available, provide the Postal Service's best estimates of such volumes.

#3771186