

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF UNITED PARCEL SERVICE, REDIRECTED FROM WITNESS JOHN P. KELLEY
(USPS-T-15) (UPS/USPS-T15-2-3)
(July 25, 2006)

The United States Postal Service hereby provides its institutional responses to the following interrogatories of United Parcel Service, filed on July 11, 2006, and redirected from witness John P. Kelley (USPS-T-15):

UPS/USPS-T-15-2-3

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF UNITED PARCEL SERVICE, REDIRECTED FROM WITNESS KELLEY (USPS-T-15)

UPS/USPS-T15-2. Provide separately for each class of mail the total amount of (a) pieces, (b) pounds, and (c) cubic feet of mail carried under the FedEx contract in the Base Year (2005).

Response:

The table below provides estimates of the pieces, pounds and cubic feet of mail, by mail class, transported under the FedEx contract during FY 2005. Cubic feet are not tracked for the Night-turn mode.

(Data in Thousands)

Mail Class	Pieces	Pounds	Ft³
First-Class Mail	7,139,044	424,796	45,474
Priority Mail	347,424	836,544	161,734
Express Mail	28,705	54,530	1,033
Periodicals	34,050	15,591	1,741
Standard Mail	242,720	21,578	2,225
Package Services	5,772	9,821	1,556
USPS Mail	54,432	11,043	1,324
Free Mail	3,606	1,569	240
International	61,550	58,538	5,126
	=====	=====	=====
	7,917,304	1,434,011	220,452

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
UNITED PARCEL SERVICE, REDIRECTED FROM WITNESS KELLEY (USPS-T-15)

UPS/USPS-T15-3. Do you expect that the composition by class of mail, measured in terms of pieces, pounds, or cubic feet carried under the FedEx contract will vary significantly in the Test Year from that carried under the contract in the Base Year? If so, provide separately for each class of mail your best estimate of the total amount of (a) pieces, (b) pounds, and (c) cubic feet of mail expected to be carried under the FedEx contract in the Test Year.

RESPONSE:

The Postal Service has no reason to believe that the relative composition by class of mail, whether measured by pieces, pounds, or cubic feet, will vary significantly between the Base Year and the Test Year. The Postal Service cannot, at this time, provide an estimate of the overall volume of mail that will be carried under the FedEx in the Test Year.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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