Postal Rate Commission
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BEFORE THE
POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 2006	:	**DOCKET NO. R2006-1**

FOLLOW-UP INTERROGATORY FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS MILLER (UPS/USPS-T21-19)
(July 26, 2006)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files following follow-up interrogatory directed to United States Postal Service witness Miller: USPS-T-21-19.

Respectfully submitted,

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FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO
UNITED POSTAL SERVICE WITNESS MILLER

UPS/USPS-T21-9. Refer to your response to UPS/USPS-T21-9(d).

(a) Confirm that the parcel characteristics ("the weight exceeds 35 pounds, the length exceeds 34 inches, or the sum of the length and girth exceeds 84 inches") used to classify non-machinable parcels in USPS-LR-L-47 correspond with the parcel characteristics used to assess mailers a non-machinable rate surcharge for Parcel Post listed in Domestic Mail Manual, § 101.7.2. If not confirmed, explain in detail.

(b) Confirm that the parcel characteristic ("nonrectangular") used to classify non-machinable parcels in Section H of USPS-LR-L-77 (Billing Determinants, Fiscal Year 2005), which is used as the basis for the billing determinants listed in USPS-LR-L-82, WP-PP-4 and WP-PP-5, does not accurately correspond with the parcel characteristics used to assess mailers a non-machinable rate surcharge for Parcel Post listed in Domestic Mail Manual, § 101.7.2. If not confirmed, explain in detail.

(c) Confirm that an incorrect estimate of the share of non-machinable parcels can impact the RPW Revenue Adjustment Factors for Parcel Post listed in Section H-1, page 10 of 10, USPS-LR-L-77, and derived from the Calculated Revenues listed in Section H-1, pages 7-9 of 10, USPS-LR-L-77. If not confirmed, explain in detail.

(d) Confirm that the non-machinable shares that are calculated in USPS-LR-L-47 should be used in place of the non-machinable shares in the billing determinants in Section H-1, USPS-LR-L-77. If not confirmed, explain in detail.