

**BEFORE THE  
POSTAL RATE COMMISSION**

---

**POSTAL RATE AND FEE CHANGES, 2006**

---

**DOCKET NO. R2006-1**

---

**FOLLOW-UP INTERROGATORIES FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS PAGE  
(UPS/USPS-T23-5 and 6)  
(July 27, 2006)**

---

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files the following follow-up interrogatories directed to United States Postal Service witness Page: USPS-T-23-5 and 6.

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

FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS PAGE

UPS/USPS-T23-5. Refer to your response to UPS/USPS-T23-3.

(a) Confirm that per DMM § 507.11.1.4 RDU Parcel Return Service pieces can be deposited: a) at any post office, station or branch; b) in any collection box (except an Express Mail box); c) with any letter carrier; d) as part of a collection run for other mail; or e) at any place designated by the postmaster for the receipt of mail. If not fully confirmed, explain in detail.

(b) Confirm that RDU Parcel Return Service pieces will incur carrier costs if deposited in a collection box or with a letter carrier. If not fully confirmed, explain in detail.

(c) Refer to Docket No. MC2006-1 USPS-T-2, page 2 and Appendix B, page 3.

- i. Confirm that PRS pieces were estimated to incur acceptance costs of \$0.237 per piece in TY06 in Docket No. MC2006-1. If not fully confirmed, explain in detail.
- ii. Confirm that your final adjustment for the additional RDU pieces provided in UPS/USPS-T23-2(f) did not include any acceptance costs. If not fully confirmed, explain in detail.
- iii. Provide a version of Attachment B, page 3 updated to the Test Year in this docket, including updating the wage rate, variability and piggyback factor.

FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS PAGE

- iv. Provide an updated calculation of the PRS Final Adjustment Inputs presented in UPS/USPS-T23-2(f) that includes the PRS acceptance cost in part iii, above.

UPS/USPS-T23-6. Refer to the responses to UPS/USPS-T32-4 (redirected to Berkeley), PSA/USPS-T37-7(d) (redirected from Kiefer), and UPS/USPS-T37-11. Provide your recommended Parcel Post Delivery Confirmation Adjustment for the TYBR and TYAR.