

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORY OF THE UNITED STATES POSTAL SERVICE
TO UNITED PARCEL SERVICE WITNESS LUCIANI (USPS/UPS-T2-13)
(October 4, 2006)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatory to United Parcel Service witness Luciani: USPS/UPS-T2-13.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/UPS-T2-13 On lines 5 to 15 of page 8 of your testimony you criticize certain cost model inputs based on the age of the data. For each of those inputs, please (a) identify any changes in parcel processing operations at the BMCs that you believe would have had an impact on the input, and (b) identify how those identified changes should have impacted the input.