

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

FOLLOW-UP INTERROGATORY OF THE UNITED STATES POSTAL SERVICE
TO UNITED PARCEL SERVICE WITNESS R. RICHARD GEDDES
(USPS/UPS-T3-7) (October 25, 2006)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatory to United Parcel Service witness R. Richard Geddes (UPS-T-3):

USPS/UPS-T3-7

If witness Geddes is unable to answer a question, or subpart of a question, the Postal Service requests that the interrogatory be redirected to another witness or to United Parcel Service as an institution.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/UPS-T3-7. Please refer to your response to USPS/UPS-T3-4(d), filed on October 18, 2006. The instructions to the interrogatory included the following:

If witness Geddes is unable to answer a question, or subpart of a question, the Postal Service requests that the interrogatory be redirected to another witness or to United Parcel Service as an institution.

USPS/UPS-T3-4(d) read:

d. While Priority Mail volume was declining by 30.5 percent, by how much did UPS volume in the total (ground and air, combined) 2- and 3-day package and document delivery market change from 2000 to 2004? Please provide your response both in absolute and percentage terms.

Your response to this interrogatory read:

d. I have not been asked to examine UPS's volume data, and therefore I do not have it.

Please, in accordance with the instructions, redirect this interrogatory to another witness, or to United Parcel Service as an institution, for a response to the question posed in USPS/UPS-T3-4(d).

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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October 25, 2006