

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-62, 65, 79-80)
(June 15, 2006)

The United States Postal Service hereby objects to interrogatories DBP/USPS-62, 65, 79-80, filed by David B. Popkin on June 5, 2006. Each interrogatory is reprinted below, and is followed by the bases for these objections:

DBP/USPS-62

Please provide a copy of the EXFC dropper instructions referred to in the last sentence of the first paragraph of Section B.2 of USPS-LR-L-134.

Instructions sought by this interrogatory were developed by a contractor and are considered proprietary by both the Postal Service and the contractor. They are marked confidential in accordance with 18 U.S.C. § 1905. The Postal Service does not release this information internally to prevent manipulation of the system. The Postal Service does not release this information externally because public disclosure would risk duplication of the contractor's process by its competitors. In addition, the instructions are relevant to any of the rate or classification issues in this docket.

DBP/USPS-65

Please provide a copy of the EXFC reporter instructions referred to in the last sentence of Section C.2 of USPS-LR-L-134.

Again, instructions sought by this interrogatory were developed by a contractor and are considered proprietary by both the Postal Service and the contractor. They are marked

confidential in accordance with 18 U.S.C. § 1905. The Postal Service does not release this information internally to prevent manipulation of the system. The Postal Service does not release this information externally because public disclosure would risk duplication of the contractor's process by its competitors. In addition, the instructions are relevant to any of the rate or classification issues in this docket.

DBP/USPS-79

This interrogatory reads as follows:

Please provide a copy of the PETE dropper instructions referred to in the last sentence of the first paragraph of Section B.2 of USPS-LR-L-134.

Once again, instructions sought by this interrogatory were developed by a contractor and are considered proprietary by both the Postal Service and the contractor. They are marked confidential in accordance with 18 U.S.C. § 1905. The Postal Service does not release this information internally to prevent manipulation of the system. The Postal Service does not release this information externally because public disclosure would risk duplication of the contractor's process by its competitors. In addition, the instructions are relevant to any of the rate or classification issues in this docket.

DBP/USPS-80

This interrogatory reads as follows:

Please provide a copy of the PETE reporter instructions referred to in the last sentence of the first paragraph of Section C.2 of USPS-LR-L-134.

Once again, instructions sought by this interrogatory were developed by a contractor and are considered proprietary by both the Postal Service and the contractor. They are marked confidential in accordance with 18 U.S.C. § 1905. The Postal Service does not release this information internally to prevent manipulation of the system. The Postal Service does not release this information externally because public disclosure would

risk duplication of the contractor's process by its competitors. In addition, the instructions are relevant to any of the rate or classification issues in this docket.

For the reasons discussed above, the Postal Service objects to interrogatories DBP/USPS-62, 65, 79-80.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Brian M. Reimer
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037; Fax -5402

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037; Fax -5402
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