

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 7/26/2006 6:27 am  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

DAVID B. POPKIN SUPPLEMENTAL MOTION TO COMPEL RESPONSE TO  
INTERROGATORY DBP/USPS-151

I wish to file supplemental information to the filing that was made on July 25, 2006 in my motion entitled DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-151 AND 157

July 26, 2006

Respectfully submitted,

R20061MTC10A151157SUP

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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On July 3, 2006, I submitted Interrogatories DBP/USPS-151 and 157. On July 13, 2006, the Postal Service filed an objection to these interrogatories.

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The interrogatory reads as follows:

DBP/USPS-151 [a] Please provide me a listing of the percentage of the retail service windows that are open on Saturday countrywide as well as a separate listing broken out by District.

[b] Please provide me a listing of the percentage of the post office box lobbies that are open on Saturday countrywide as well as a separate listing broken out by District.

[c] Please provide the criteria that are considered for the establishment of Saturday post office lobby hours at a particular facility.

[d] Please provide the criteria that are considered for the establishment of Saturday retail window service hours at a particular facility.

The Postal Service partially objected to subparts a and b on the grounds of relevance and burden. I wish to make an additional statement with respect to the claimed burden of several days of continuous work to provide the requested data.

I have been advised by Mr. Douglas F. Carlson that in response to a Freedom of Information Act request that he made to the Postal Service he received an electronic file po-close.xls which appears to provide data for 40828 individual ZIP Codes under the categories "Orig ZIP/Mon-Fri/Sat/Sun/Hol and showing times or a "0" in the various data fields. This file was provided in a letter dated July 18, 2006, from Jennifer B. Heppenstall, Manager, Integrated Network Development. This letter indicates, "po-close.xls which applies to PO-to-PO service and PO-to-addressee where the addressee receives delivery via a PO Box."

This file appears to provide data on Saturday window hours, although, based on my knowledge of local offices in my area, appears to be somewhat outdated. If an up-to-date file exists showing the closing time for Saturday window service or a "0" if there is no window service, it should be possible for the Postal Service to respond to subpart a of my interrogatory with a greatly limited burden.

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For the reasons stated in this pleading and in the original pleading, I move to compel response to the referenced interrogatory since it is reasonably calculated to lead to the discovery of admissible evidence.

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#### 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.

David B. Popkin      July 26, 2006

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