

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES DBP/USPS-553-55

The United States Postal Service hereby objects to interrogatories DBP/USPS-553, 554, and 555, filed on August 16, 2006. These questions are irrelevant to the issues in this case.

DBP/USPS-553 asks:

Please refer to your response to Interrogatory DBP/USPS-264. Please advise the type of data and information that is contained in Report IS-MA-06-001 that required withholding the entire report as opposed to providing a copy with necessary redactions.

The reference report is "Security Over Sensitive Customer Data on Automated Postal Center Kiosks." The report was withheld at the request of the Office of the Inspector General. The Postal Service agrees that the sensitive nature of the subject matter makes it inappropriate for public disclosure. The Presiding Officer has denied Mr. Popkin's motion to compel a response to an interrogatory on the subject of APC security (DBP/USPS- 265) because of a lack of a showing of how the response "could influence the Commission's consideration of rate and classification proposals in this case." Presiding Officer's Ruling No. R2006-1/55, at 6 (August 24, 2006). The IG report is similarly irrelevant.

DBP/USPS-554 asks:

Please refer to your response to Interrogatory DBP/USPS-264. Please advise the nature of each of the separate parts of the Report DR-AR-05-517 that were redacted and the reason for the redaction.

The referenced report ("Balloon Rate and Parcel Surcharges") was issued by the Office of the Inspector General, which functions independently. These redactions were made by the OIG, and are the same redactions made when the report was released under FOIA. Reasons for redaction are not a material issue in this docket. Mr. Popkin was still able to pose numerous interrogatories based on the report as provided and the Postal Service is filing responses to these. The information sought by this interrogatory is irrelevant.

DBP/USPS-555 asks:

Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264. Please confirm, or explain if you are unable to confirm, that the audit team evaluated a total of 10,006 parcels at four facilities situated in two Districts. Of these 10,006 parcels, 254 of them, or 2.54% of the parcels, were determined to require a surcharge and if was further determined that only 20 of these parcels, or 7.9%, of them were properly paid at the correct postage rate.

These figures were apparently taken by Mr. Popkin from the report. The report was issued by the OIG. The report speaks for itself and there is no need for him to ask the Postal Service to confirm its contents.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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