

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INSTITUTIONAL INTERROGATORY FROM DAVID POPKIN
DBP/USPS-519
(August 28, 2006)

The United States Postal Service hereby provides its response to the following institutional interrogatory from David Popkin: DBP/USPS-519, filed on August 14, 2006.

The interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-519. Please refer to your response to Interrogatory DBP/USPS-409. The response to Interrogatory DBP/USPS-48 subpart b filed on July 20, 2006, stated that there were no corrections necessary to the EXFC mailpiece chart. Comparison with the chart filed with the response to Interrogatory DBP/USPS-409 showed a number of apparent updates from the original chart particularly in the dimensions of the mailpieces and elimination of the Code G mailpiece.

- [a] Please advise whether the Chart filed on July 20, 2006 in response to Interrogatory DBP/USPS-48 or the Chart filed on August 7, 2006 in response to Interrogatory DBP/USPS-409 contains the correct information.
- [b] Please advise why the July 20, 2006, response stated "None were necessary" when apparently a number of corrections or updates were necessary.

RESPONSE:

a-b. Both contain correct information. Contrast the first line of the response to DBP/USPS-409 with the explicit time frame in DBP/USPS-48.