

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-670-671, 675)
(October 11, 2006)

The United States Postal Service hereby objects to the above-listed interrogatories of David Popkin. DBP/USPS-670-671 were filed on September 26, 2006, and DBP/USPS-675 was filed on September 27, 2006.

DBP/USPS-670 Please refer to your response to Interrogatory DBP/USPS-267. OIG Report Number IS-AR-06-005 indicated that the \$1 telephone and Internet Change of Address filing fee was suspended.

[a] When was the effective date of the waiver?

[b] Is the waiver still in effect?

[c] If not, when did it terminate?

[d] If so, what are the plans, if any, for terminating it?

[e] Please advise any specific geographical locations that are/were eligible for the waiver of the \$1 fee. Please specify whether the geographic restriction applies to either

or both of the old or new address.

DBP/USPS-671 Please refer to your response to Interrogatory DBP/USPS-267. OIG Report Number IS-AR-06-005 indicated that the \$1 telephone and Internet Change of Address filing fee was suspended and compensating controls were implemented to help reduce fraud.

[a] Please provide full details of these compensating controls.

[b] Please advise the cost of implementing these controls.

[c] Please advise the success of these controls in preventing fraud.

[d] Please advise why these compensating controls can not be implemented on a permanent basis to avoid the need for the \$1 verification fee.

DBP/USPS-675 Please refer to your response to Interrogatory DBP/USPS-141 subpart b as revised on September 21, 2006.

[a] Please provide a complete listing of all of the information that is provided to the credit card company. Please do not use an etc. in your response.

[b] Please discuss the method by which the data entered or provided by the purchaser is transferred to the credit card processing company, i.e. by a computer transfer, by voice, etc.

The Postal Service objects to these interrogatories because they seek operational information at a level of detail that is irrelevant and immaterial to the issues in this proceeding. DBP/USPS-670 and 671 refer to an OIG Report entitled "National Change of Address – Emergency Preparedness." The report focuses on the Postal Service's response to Hurricane Katrina, related to the implementation of emergency Change of Address procedures. As the report itself states, Hurricane Katrina was an emergency, and the Postal Service took emergency measures to deal with this extraordinary event. Although the details of these emergency, extraordinary, procedures may be of interest to Mr. Popkin, they have no bearing on the rate and classification proposals in this case. Likewise, the information sought by DBP/USPS-675 would add no information to the record that would be relevant to rates and classifications proposed in this case.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Sheela A. Portonovo

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3012, FAX -6187