

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
TO INTERROGATORIES OF DAVID POPKIN. (DBP/USPS-253 AND 254)
(July 20, 2006)

The United States Postal Service hereby objects to the following interrogatories of David Popkin, filed on July 10, 2006: DBP/USPS-253 and 254.

DBP/USPS-253

The question reads:

Please provide your best estimate of the percentage of processing facilities that provide overnight First-Class Mail service standards to all of the SCF or 3-digit ZIP Code destinations that have a transit time of three hours or less dock-to-dock and receive 1.5% or more of the originating volume of the facility.

DBP/USPS-254

The question reads:

- [a] Please discuss why the "line" between First-Class Mail overnight and 2-day service is not complied with to the same extent as the "line" between 2-day and 3-day service standards is complied with.
- [b] Please discuss any plans to improve the level of compliance for the overnight/2-day line.

These questions do not seek information relevant to First-Class Mail costs or rates. Or even postal ratemaking in general. The questions seek comparisons of the potential degree of deviation in the application of current First-Class Mail service standard definitions among 3-digit ZIP Code pairs. If the questions in these interrogatories seem familiar, it is because they are nothing more than a transparent

attempt to abuse the discovery process in the instant rate case for the purpose of circumventing Presiding Officer's Ruling No. N2006-1/21 (July 10, 2006).

Docket No. N2006-1 interrogatories DBP/USPS-87 and 88 were not deemed suitable in that proceeding. Renumbered and re-worded, those questions now seek information that has no relevance to the issues in Docket No. R2006-1 either.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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