

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

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-257-258, 260, 263, and 265)
(July 21, 2006)

The United States Postal Service hereby objects to the following interrogatories of David Popkin, filed on July 21, 2006: DBP/USPS-257-258, 260, 263, and 265. The questions read:

DBP/USPS-257 Please reconcile the apparent difference between the response to Interrogatory GCA/USPS-T42-6 which states that the new postmark includes the "Time in hours, minutes (HH:MM) using military time or PM designation" and the response to Interrogatory DBP/USPS-106 subpart a which states that "The time is shown as AM or PM" and subpart b which states, in effect, that specific numerical times are not shown.

DBP/USPS-258 Please refer to the response to Interrogatory DBP/USPS-106 subparts c and d.

[a] Is the clock normally programmed to show JUL 11 2006 AM from 12:01 AM local time on July 11, 2006 to 12 Noon on July 11, 2006 and JUL 11 2006 PM from 12 Noon on July 11, 2006 to 12 Midnight on July 11, 2006.

[b] If not, please explain and discuss.

[c] Specifically, is the cutover from July 11, 2006 to July 12, 2006 designed to take place at Midnight local time or is it designed to take place after all of the July 11th mail has been processed?

[d] What arrangements are made to ensure that all mail that is accepted at the various postal facilities that are open late on Income Tax Night and accepting mail up until Midnight will have all of that mail postmarked with the proper date, normally April 15th.

[e] Are there any particular times that the maintenance personnel will override the correct date and time or is their function limited to resetting the time to the correct local time after a "problem" occurs?

DBP/USPS-260 Please refer to the response to Interrogatory DBP/USPS-109. Please discuss and provide a comparison between the legibility and readability of the inkjet cancellation vs. the old style circular cancellation.

DBP/USPS-263 Please discuss the effectiveness of the Change of Address

program when the Postal Service is faced with major requirements for forwarding mail as was caused by Hurricanes Katrina and Rita. Please discuss the efforts that were made to return to normal postal operation and an estimation of when that will be achieved.

DBP/USPS-265 The following interrogatory is designed to evaluate the likelihood or potential that a customer who is utilizing an Automated Postal Center [APC] will leave the APC during a transaction while their credit or debit card is still activated and thereby allow a second customer to pick up the activity and obtain value from the APC which will be charged to the first customer.

[a] Please provide a copy of the screens that will appear after a customer has completed an APC transaction and until the APC will show the standard welcoming screen. Completed an APC transaction is defined as receiving the stamp either purchased as a separate stamp or as the stamp to affix to a mailpiece. If necessary, please provide separate screens for different types of transactions and/or for a credit card vs. a debit card.

[b] In these screens, please identify the point at which the credit/debit card data is no longer active and the first customer would have to re-enter the card to make an additional purchase or a second customer could obtain value under the first customer's card. If necessary, please provide separate data for a credit card vs. a debit card.

The Postal Service objects on the grounds of relevance. These questions do not focus on the rates proposed for any particular class or service. Information at this level of operational detail is patently irrelevant and immaterial to the issues presented in an omnibus rate proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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