

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
DAVID B. POPKIN INTERROGATORY TO
THE UNITED STATES POSTAL SERVICE (DBP/USPS-268)
(July 24, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-268, filed by David B. Popkin on July 12, 2006. The interrogatory is reprinted below, and is followed by the bases for this objection:

DBP/USPS-268 Please furnish the most recent First-Class Mail EXFC results for a minimum of four quarterly reports. The left side of the charts should show the Nation followed by each of the 80-some EXFC reporting areas and along the top of the chart showing Percent on Time / Margin of Error / Average Days to Deliver / Margin of Error for the following four categories: Overnight Mail / Two-Day Mail / Three-Day Mail / Nation. Please show all entries to two decimal places.

This question requests that the Postal Service file External First-Class Mail performance system (EXFC) data broken down by Performance Cluster. While data at the EXFC system-wide level are relevant to the issue of the value of service for First-Class Mail as a whole, within the meaning of 39 U.S.C. § 3622(b), the requested data are irrelevant to the issues presented in this omnibus rate and classification proceeding.

In making this objection, the Postal Service acknowledges Presiding Officer's Ruling No. R2005-1/10 (May 16, 2005), and respectfully requests that the Presiding Office reconsider that ruling in light of the evidence and record in the instant proceeding.

For all of the reasons discussed above, the Postal Service objects to interrogatory DBP/USPS-268.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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