

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN (DBP/USPS-280)
(July 24, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-280, filed on July 14, 2006. The interrogatory reads as follows:

DBP/USPS-280. Please refer to your response to Interrogatory DBP/USPS-135.

- (a) Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail is an established service.
- (b) Please explain how there could not be market demand for the addition of additional claim locations.
- (c) What "harm" would occur if the service was expanded to additional claim locations since the Express Mail transportation system is already in place and it can only serve to increase the volume and revenue.

The Postal Service objects on the grounds of relevance. The questions posed in this interrogatory have no material relevance to the recommendation of PO-PO Express Mail rates in this proceeding. Therefore, the Postal Service objects to the above-referenced interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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