

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OPPOSITION OF THE UNITED STATES POSTAL SERVICE TO  
DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES  
DBP/USPS-257-258, 260, 263, and 265  
(August 21, 2006)

The United States Postal Service hereby opposes David B. Popkin's motion to compel a response to interrogatories DBP/USPS-257-258, 260, 263, and 265, which were filed by Mr. Popkin on July 11, 2006, and objected to by the Postal Service on July 21, 2006. The interrogatories read as follows:

**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 objected to the above-listed interrogatories on the grounds of relevance. Mr. Popkin, in his motion to compel, argued that the interrogatories relate to the “value of service that is received by the users of the mail system.” See Popkin Motion to Compel at 3. However, the material requested in these interrogatories does not relate to the value of service given on a nationwide basis. The Postal Service again submits that the information requested in the above-listed interrogatories is patently irrelevant to an omnibus rate case.

The Postal Service fails to see how minute details about how times are displayed or how clocks are programmed can be relevant to establishing national postal rates in the instant docket, as Mr. Popkin requests in DBP/USPS-257-258. Similarly, a request for a comparison between the legibility and readability of inkjet cancellation versus circular cancellation, as in DBP/USPS-260, will in no way assist the Commission in establishing nationwide postal rates. In addition, providing specified screen captures

from certain hypothetical uses of Automated Postal Centers (APCs), as requested in DBP/USPS-265, has nothing to do with ratemaking. These interrogatories will only serve to make an already-complex rate case even more complex with the addition of meaningless, irrelevant details to the record.

Finally, though Mr. Popkin asserts in his motion that the Change of Address program is relevant to the instant docket, the details requested in DBP/USPS-263 pertain only to an extreme situation not material or relevant to the value of service generally given to postal customers on a nationwide basis. While the Postal Service recognizes Mr. Popkin's interest in every detail of how the Postal Service dealt with the aftermath of Hurricanes Katrina and Rita, a comprehensive discussion of these efforts is not relevant to the *nationwide* value of service of the Change of Address program in this rate case.

The above-listed interrogatories, like so many that have come before them, simply reflect Mr. Popkin's personal interest in the minutia of all things postal, and will not add any relevant evidence to this proceeding. Therefore, the Postal Service respectfully requests that the Commission deny Mr. Popkin's motion to compel responses to DBP/USPS-257-258, 260, 263, and 265.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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