

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-699 AND 700)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-699 and 700, dated November 7, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
michael.t.tidwell@usps.gov
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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGAOTRY OF DAVID POPKIN**

DBP/USPS-699 Please refer to your response to Interrogatory DBP/USPS-673. The Interrogatory asks for the status on any plans to expand or reduce the number of Automated Postal Centers [APCs] in service. This contemplates plans for a foreseeable time in the future. Your response to Interrogatory DBP/USPS-673 appears to indicate that there were no additions or subtractions over some unspecified period in the past. Please discuss future plans.

RESPONSE:

PRESIDING OFFICER'S RULING NO. R2006-1/99 regarding to motion to compel a response to DBP/USPS-673 read thusly:

DBP/USPS-673

Please refer to your response to Interrogatory DBP/USPS-285. Please advise specifically if there are any plans to expand or reduce the number of Automated Postal Centers [APCs] in service.

Interrogatory DBP/USPS-285(e) asks the Postal Service to discuss any plans to expand or reduce the number of APCs in service. The Postal Service responded, inpart, that it "plans to continue improving access to prompt, reliable and efficient services, and is constantly evaluating its efforts to do so." The Postal Service response indicates it is constantly evaluating the number of APCs, **but it does not indicate whether additions or subtractions have been approved** (emphasis added). The motion to compel a response with respect to DBP/USPS-673 is granted.

That is why the response to DBP/USPS-673 was: No additions or subtractions have been approved.

The complete answer therefore is "The Postal Service is constantly evaluating the number of APCs it needs. No additions or subtractions have been approved."

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGAOTRY OF DAVID POPKIN**

DBP/USPS-700 Please refer to your response to Interrogatory DBP-USPS-684. The fourth sentence of your response, as updated, states, "The Postal Service intends to give credit for such uses at the original purchase price." The September 27, 2006, Federal Register states the following as the second sentence of the proposed revision to DMM Section 604.1.10, "The postage value of each forever stamp is the current First-Class Mail single-piece 1-ounce letter rate." Please explain the conflict between these two. If the Postal Service intends to give credit at the original purchase price [as noted in the Interrogatory response], why are they providing a proposed DMM rule [in the Federal Register] which provides a postage value of the current letter rate as opposed to the original purchase price?

RESPONSE

The fourth sentence of the response to DBP/USPS-684 should have been read:

The Postal Service intends to give ~~is considering giving postage credit for such uses at the currently applicable First-Class Mail single-piece 1-ounce letter rate. original purchase price, but a final determination has not yet been made.~~