

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. C2001-3

Complaint on First-Class Mail
Service Standards

MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-88

November 28, 2001

On November 26, 2001, the United States Postal Service filed Objections of the United States Postal Service to Interrogatories of David Popkin ["Objections"].

Respectfully submitted,

November 28, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-88 This interrogatory attempts to determine the extent to which the 17 outlier facilities are able to meet both the requirements of the Postal Operations Manual to ensure that mail which should be entered into the system on Day 0 [subparts a, b, d, and e] will in fact be so as well as the ability to mesh with their parent P&DC's requirements [subparts c and f].

This is relevant to evaluating the service standards for mail originating at an outlier facility.

For the reasons given, the Postal Service should be compelled to provide the answers to this interrogatory that has been objected to.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

November 28, 2001

David B. Popkin