

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 INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-451-453)  
(August 14, 2006)

The United States Postal Service hereby objects to interrogatories  
DBP/USPS-451-453, filed on August 3, 2006. The interrogatories read as  
follows:

**DBP/USPS-451.** Please refer to your response to Interrogatory DBP/USPS-279 subparts b through e.

[a] Please confirm, or explain if you are unable to confirm, that the last sentence of your response means that if a given post office on the west coast has two separate cut-off times, namely, 2 PM for coverage to most of the 50 states and 5 PM for areas on the west coast only, that it will be permissible to have an Express Mail collection box with a single collection time of 4 PM which will arrive back at the post office too late for a guarantee to the 50 state area but in time for a guarantee to the west coast only [the 5 PM cut-off guarantee].

[b] If subpart a above is confirmed, please confirm, or explain if you are unable to confirm, that Express Mail destined for the east coast will be delayed a day if deposited in the collection box.

[c] Please explain why this scenario is an acceptable one, in other words, why isn't an earlier collection mandated to allow for processing to the area covered by the 2 PM cut-off time?

**DBP/USPS-452.** Please refer to your response to Interrogatory DBP/USPS-279 subparts b through e.

[a] Please explain the apparent conflict between your response to the original Interrogatory which states that Express Mail receives a service commitment based on the deposit date and DMM Section 116.1.1.b which states that Express Mail deposited in an Express Mail collection box will have a time and date of mailing of the time that the mail was brought to the Express Mail acceptance unit.

[b] Please confirm, or explain if you are unable to confirm, that DMM Section 116.1.1.b states, in effect, that the Postal Service will not accept any responsibility for Express Mail deposited in an Express Mail collection box, handed to delivery and collection employees during their normal delivery and

collection duties, or picked up by USPS pickup service until the mail actually is brought back to the Express Mail acceptance unit and that in some large cities the mail may not arrive there until well into the evening and miss the dispatches of value. Furthermore, any delays or errors between the time the mail is or is supposed to be collected and the time it is actually turned over to the Express Mail acceptance unit are at the risk of the mailer.

[c] Please explain the rationale for DMM Section 116,1,1,b with respect mail deposited in an Express Mail collection box.

[d] Please explain the rationale for DMM Section 116,1,1,b with respect mail that is handed to delivery and collection employees during their normal delivery and collection duties.

[e] Please explain the rationale for DMM Section 116,1,1,b with respect mail that is picked up or is scheduled to be picked up [a missed or delayed appointment] by USPS pickup service.

**DBP/USPS-453.** Please refer to your response to Interrogatory DBP/USPS-279 subpart f. Your response stated that the retail computers will allow the acceptance associate to roll back the mailpiece's acceptance time to the collection box tap time.

[a] Is this a requirement rather than an option to do so?

[b] If not, why not?

[c] Is a similar roll back appropriate for Express Mail deposited at a retail service window a minute or two after the cut-off time by a customer that was waiting on line and/or a delay by the retail window clerk in processing the mailpiece?

[d] If not, why not?

The Postal Service objects to all of these interrogatories on the grounds of relevance, as they all seek operational details about Express Mail service, particularly as it relates to Express Mail collection boxes, that are immaterial to this proceeding. In addition, the Postal Service also objects to interrogatory DBP/USPS-452 on the grounds of lack of timeliness. DBP/USPS-452 does not constitute proper follow-up of the Postal Service's response to DBP/USPS-279(b)-(e), but instead seeks to delve into new topics with respect to the meaning of a DMM section that does not in any way conflict with the Postal Service's response to that earlier interrogatory. Because DBP/USPS-452 was submitted

after the discovery deadline, and does not constitute proper follow-up of a previous Postal Service response, it is untimely.

Therefore, the Postal Service objects to the above-referenced interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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