

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF DAVID B. POPKIN TO COMPEL
RESPONSES TO DBP/USPS-7 AND 13
(April 7, 2000)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this response to the motion of Mr. Popkin to compel responses to interrogatories DBP/USPS-7 and 13.¹ Because of the press of other rate case deadlines, the Postal Service has not been able to complete its opposition to Mr. Popkin's motion to compel with respect to interrogatories DBP/USPS-5(i) and 10(c).

DBP/USPS-7

Interrogatory DBP/USPS-7(d) asks for the specific data utilized to determine back in 1998 that the Englewood Cliffs, NJ 07632 facility should be changed on January 10, 1999 from Group C to Group B. Witness Kaneer provided some site specific information in his response, filed March 17, 2000. Moreover, as Mr. Popkin notes, he has recently obtained access under protective conditions to a large amount of site specific data, including some for Englewood Cliffs, used by the Postal Service to prepare its post office box reclassification proposal in this proceeding.

To the extent that Mr. Popkin is not satisfied with these data, the Postal Service opposes his request for more site specific data related to the 1998 decision to change Englewood's fee group. The resulting January 10, 1999 fee group changes for 21

¹ March 31 Motion to Compel Responses to DBP/USPS Interrogatories DBP/USPS-5[i], 7, 10[c], 11[b-m], and 13, filed by David B. Popkin March 31, 2000.

facilities were based solely on cost per square foot and box utilization. USPS-T-40 at 10-11. In this proceeding, the Postal Service is basing its proposed reclassification of post office box facilities on witness Yezer's analysis of rental values, which in turn is based on a wide variety of factors. See USPS-T-31. The Postal Service thus has moved beyond reclassifying boxes bases simply on cost per square feet, or on box utilization. Site-specific data on the 1998 fee group change thus are not material to Mr. Popkin's stated interest in "evaluat[ing] the precise way that the Postal Service uses to calculate post office box rates"², at least with respect to this proceeding.

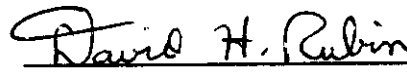
With regard to interrogatory DBP/USPS-13, the Postal Service is filing separately today a response consistent with Mr. Popkin's offer stated in paragraph 7 of his motion to compel. That response should moot Mr. Popkin's motion to compel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 7, 2000

² *Id.* at 2.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


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