

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

RESPONSES OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-103 AND 127(b))

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBP/USPS-103 & 127(b). Mr. Popkin moved to compel responses to these unanswered questions on April 25, 2000.

The Postal Service apologizes to Mr. Popkin for its late response; these questions simply fell through the cracks.¹ In light of the nature of the material, however, the Postal Service does not believe any party will be prejudiced by the late filing.

¹ It must be noted, however, that the likelihood of such errors is greatly magnified by the form and manner in which Mr. Popkin continues to file his interrogatories, with no separation by witness or subject area and with scores or hundreds of individual questions in one set. Thus, rather than one attorney and one witness being generally responsible for a given set of interrogatories, the attention of several or all attorneys and many witnesses and other postal staff must be engaged simultaneously on one discrete project in the midst of a maelstrom of discovery. This situation creates practical problems for coordinating responses and, as in this instance, sometimes leads to inadvertent failure to respond. Despite our successful efforts in working together as a team within the Postal Service to respond to rate case discovery, the adage concerning too many chefs still applies to situations where many are cooking the same meal at the same time. Although we are sympathetic to Mr. Popkin's desire to reduce the number of filings he makes, there are certainly ways he could facilitate handling of his discovery requests. Our past suggestions in this regard, however, have not been heeded.

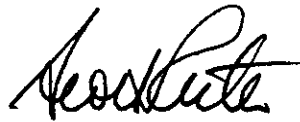
Each question is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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May 2, 2000

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DBP/USPS-103 [a] Please provide a breakdown by one ounce weights showing the number and/or percentage of the total volume of Express Mail articles that are mailed in a flat rate envelope. Over 32 ounces may be shown in a single category if desired. [b] What percentage of the total volume of Express Mail articles that are mailed in flat rate envelopes are under 8 ounces, are between 8 and 32 ounces, and are over 32 ounces? [c] Provide details of any study or evaluation of Express Mail articles that are mailed in flat rate envelopes and which weigh under 8 ounces as to whether they are paid at the 8 ounce rate [presently \$11.75] or are paid at the flat rate postage [presently \$15.75].

RESPONSE:

The requested data are unavailable.

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DBP/USPS-127 [b] Refer to your response to DBP/USPS-5(i)(5). Are there any envelopes which may be utilized as an Express Mail flat-rate envelope? If so, provide details.

RESPONSE:

Yes. Form EP-13F is the Express Mail flat-rate envelope.

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.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", is written above a solid horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
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