

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DPB/USPS-197-200)  
(May 5, 2000)

The Postal Service hereby objects to interrogatories DBP/USPS-197-200, filed by David B. Popkin on April 25, 2000, and directed to the Postal Service.

Interrogatory DBP/USPS-197 is an attempt to ask once again interrogatories DBP/USPS-29 through 36. These interrogatories were the subject of Presiding Officer's Ruling No. R2000-1/56, issued on May 2, 2000. The Postal Service will be responding in accordance with the Ruling; accordingly interrogatory 197 is cumulative and moot.

Interrogatory DBP/USPS-198 seeks, in excruciating detail, elaboration about circumstances that affect a tiny percentage of Express Mail—that which is destined for isolated areas receiving less-frequent-than-normal mail service. In accordance with Ruling 56, the Postal Service objects to the level of detail in these questions. While the overall level of Express Mail service is relevant, the operational details concerning what are isolated instances sought by these interrogatories will not shed any light on the issues before the Commission. The Presiding Officer has already ruled that "the Postal Service is not required to respond in detail" to "questions [that] seek highly specific operational or managerial details ... about Express Mail." Ruling No. 56, at 2.

Interrogatory DBP/USPS-199 asks the Postal Service to provide customers' "expectations" about the above exceptional circumstances. Again, give the limited

nature of the subject circumstances, this question is unlikely to lead to the discovery of admissible evidence; therefore the Postal Service objects.

Interrogatory DBP/USPS-200 refers to DBP/USPS-80(e), which asked "[w]hat percentage of the Express Mail users in the country do you feel will believe that the use of the word guarantee, or its derivatives, will indicate that, barring a failure, delivery will be made by the guaranteed time?" The Postal Service indicated in its response that it had no responsive information. Mr. Popkin now asks for an approximation. The Postal Service objects. In light of the answer that there is no information on which to base an answer, the question is cumulative, and the information now sought, essentially a guess, is not likely to lead to the product of admissible evidence.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

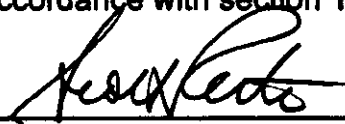
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Rate-making

  
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Scott L. Reiter

**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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Scott L. Reiter

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