

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-201-202)  
(May 5, 2000)

The Postal Service hereby objects to interrogatories DBP/USPS-201 and 202, filed by David B. Popkin on April 25, 2000, and directed to the Postal Service.

Interrogatory DBP/USPS-201 asks for a different response to interrogatory DBP/USPS-137, which asked witness Mayo to explain her answer to interrogatory DBP/USPS-17. Even though her original answer to DBP/USPS-17 was responsive, witness Mayo provided additional explanation in response to DBP/USPS-137, in hopes of satisfying Mr. Popkin's concerns. Instead, Mr. Popkin is asking still more follow-up based on witness Mayo's claim that customers receiving box mail after it is delivered is "similar" to customers receiving mail at their residence after it is delivered. The Postal Service objects because this interrogatory is cumulative and lacks relevance to any material issues in this proceeding. Witness Mayo's response fully explained her conclusions. If Mr. Popkin has a different view he can express it in testimony or on brief. He should not be allowed to ask argumentative questions until he gets a response that exactly matches his view of an issue.

Interrogatory DBP/USPS-202(a-b) is based on a U-PIC claim on its website that it is a strategic partner of the Postal Service. Part (a) asks for a description of the

partnership, and part (b) asks for any contract that exists. Interrogatory DBP/USPS-202(c) asks how U-PIC can charge less for insurance than the Postal Service.

Interrogatory DBP/USPS-202(d) asks, if U-PIC insurance is promoted or utilized on Shipping Online, why is it not promoted for other Postal Service services, such as insured mail. The Postal Service objects for the reasons described below. Parts (a) through (c) are questions for U-PIC, rather than the Postal Service, and may relate to Shipping Online, rather than this rate proceeding. The Postal Service does not agree that a "strategic partnership" exists between U-PIC and the Postal Service, and does not have a contract establishing a strategic partnership. To the extent U-PIC's involvement in Shipping Online is involved, that relationship is limited to the placement of website links on each other's websites, so that insurance is readily available over the Internet to Shipping Online customers. In any case, the Presiding officer has already determined that "Shipping Online is not in issue in this proceeding." Presiding Officer's Ruling No. R2000-1/56, at 7.

The Postal Service also is not able to explain the basis for U-PIC's insurance charges, as requested in part (c). Witness Mayo's response to interrogatory DBP/USPS-24(d) has already conceded that private insurance services generally charge less than the Postal Service, and notes that other insurance services are available over the Internet, unlike Postal Service insurance.<sup>1/</sup>

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<sup>1/</sup> Given that window service costs are a significant cost component underlying the Postal Service's fees, it would not be surprising for insurance offered over the Internet to cost less.

Interrogatory DBP/USPS-202(d) is not proper follow-up, is cumulative, and really asks about Shipping Online, rather than issues in this rate proceeding. This interrogatory purports to follow up on interrogatory DBP/USPS-138, but that interrogatory asked about U-PIC's charges, rather than why it is or is not promoted. Questions about why third-party insurance is utilized on Shipping Online, but not promoted to retail customers of insurance, could have been asked earlier, especially given witness Mayo's response to interrogatory DBP/USPS-24(d), filed March 24, which conceded that third-party insurance generally costs less, and that third-party insurance can be available over the Internet (an important concern for an Internet software package like Shipping Online). Knowledge about the specific charges for U-PIC, even if only recently gained by Mr. Popkin, should not open this issue at this late date. In any case, answering this question really involves explaining why U-PIC is used for Shipping Online, rather than why it is not, like most other competitive third-party products, not offered in competition with existing postal special services or classes of mail. Since Shipping Online is not at issue in this proceeding, the Postal Service is not required to respond. Finally, this question is cumulative of what was asked in interrogatory DBP/USPS-24(d), and "it appears that . . . the extent of the information the Service has

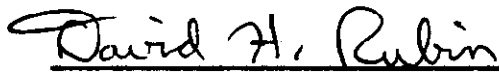
on this topic" has already been provided in that response. Presiding Officer's Ruling No. R2000-1/56, at 7.<sup>2/</sup>

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

### 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.

  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
May 5, 2000

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<sup>2/</sup> That ruling does request a "complete description of Shipping Online", which will provide some additional information on Shipping Online in general.