

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 INTERROGATORY OF DAVID B. POPKIN (DPB/USPS-219)
(May 15, 2000)

The Postal Service hereby objects to interrogatory DBP/USPS-219, filed by Mr. Popkin on May 3, 2000, and directed to the Postal Service.

Interrogatory DBP/USPS-219 reads as follows:

DBP/USPS-219. Please refer to your response to DBP\USPS-170[b]. In the second example that you gave [retail window open until 5 PM / last dispatch at 4 PM], shouldn't the last dispatch be at 5 PM or later? If not, why not?

The Postal Service objects on the grounds of relevance. Once again, Mr. Popkin is not seeking information, he is using what purports to be discovery to argue about what operational practices should and should not be. The earlier response describes an operational situation (an office in which the retail window is open until 5PM, but the last daily dispatch to the mail processing facility is on transportation which picks up at the office no later than 4PM) which exists in the real world for reasons that relate to local conditions and the minutiae of postal operational logistics and practices. Whether or not Mr. Popkin believes that the situation should not exist has nothing to do with the rates to be recommended by the Commission in this proceeding. Rate case do not exist to review

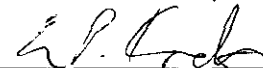
operational practices. The Postal Service objects.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

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.



Eric P. Koetting

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