

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-222-224)
(May 15, 2000)

The Postal Service hereby objects to interrogatories DBP/USPS-222 to 224, filed by David B. Popkin on May 3, 2000, and directed to the Postal Service.

Interrogatory DBP/USPS-222 purports to follow-up on witness Mayo's response to interrogatory DBP/USPS-157, and asks for operational details about a new POS-1 capability that will assist in completing the certified mail form at the retail window. These details are not relevant to the pricing of certified mail, or any other products, in this proceeding. In particular, they concern a retail function that is not used to track certified mail.^{1/} To the extent parts (d-h), concerning scanning of the article "into the system at the time of mailing", address areas distinct from the POS-1 system, they could have been asked earlier, and thus are not proper follow-up.

Interrogatory DBP/USPS-223 follows up on one sentence of witness Mayo's response to interrogatory DBP/USPS-158(c), which noted that a customer could indicate the year on a return receipt card that is received back dated without the year. Part (a)

^{1/} This should relieve Mr. Popkin's apparent concern that this POS-1 capability will be used to capture acceptance data for certified mail, or have an impact on certified mail that is not entered at a retail window.

asks whether such an action could affect the validity of the return receipt as a legal document, and part (b) asks how a delivery employee can indicate that a correction to an error on a return receipt at the time of completion is proper. The Postal Service objects because these questions on the operations surrounding one small part of the information provided by a return receipt are not relevant to any issue in this proceeding, part (a) asks for a legal conclusion, and the research to determine a response would be burdensome, given the lack of relevance. The Postal Service is not aware of court cases on how customer notes on a return receipt affects its validity, and should not be required to conduct legal research on this issue. The Postal Service is also not aware of regulations on the markings used for correcting return receipts. Mr. Popkin should not be allowed to punish, through follow-up, witness Mayo's willingness to provide responsive information in this proceeding.

Interrogatory DBP/USPS-224 asks witness Mayo to reanswer interrogatory DBP/USPS-159(b). That interrogatory asked for confirmation that it is no longer possible to purchase return receipt service showing the address where the article was delivered. Witness Mayo did not confirm, because the current return receipt service provides the address where the article was delivered in the most significant cases, when the delivery address is different from the mailing address. This is a proper response, and a simple confirmation to satisfy Mr. Popkin would be misleading, given the nature of the existing return receipt service. A further response will not add to the record in this

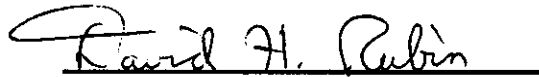
proceeding, and is not necessary for whatever point Mr. Popkin wishes to make in testimony or on brief. This interrogatory is therefore cumulative.

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

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