

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN,  
AS REQUIRED BY PRESIDING OFFICER'S RULING NO. R2000-1/59  
(DBP/USPS—130)

The United States Postal Service hereby provides its response to the following interrogatory of David B. Popkin: DBP/USPS—130, as compelled by Presiding Officer's Ruling No. R2000-1/59, issued May 10, 2000.

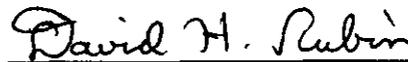
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



David H. Rubin

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Washington, DC 20260-1137  
(202) 268-2986; Fax -6187  
May 19, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN**

**DBP/USPS-130** On March 1, 2000, Attorney David H. Rubin provided me with a copy of LR-I-181 and indicated that I could obtain copies either through formal discovery or with a FOIA request. Formal discovery is easier and quicker so, please provide me with copies of the following reports:

[a] Page 87 2/18/99 311-1262203-PA(3) - Registered Mail Operations

[b] Page 87 4/30/98 029-1217904-PA(1) - National Audit on External First-Class Collections

[c] Page 87 8/10/98 050-1231591-PA(2) - Two-Three Day Mail and Priority Mail, Washington DC 20066

[d] Page 87 4/10/98 051-1218053-PA(3) - Mail Service Between EXFC and Non-EXFC Cities, Orlando FL 32862

[e] Page 93 9/29/99 DS-AR-99-003 - Government Mails Section of the Brentwood Processing and Distribution Center, Washington DC.

**RESPONSE:**

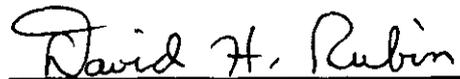
Redacted copies of the requested reports are being filed in library reference I-380, and are also being sent to Mr. Popkin. Consistent with Presiding Officer's Ruling No.

R2000-1/59, at 10-11, redactions were made by Inspection Service personnel, to protect::

- 1) names of individuals, for privacy reasons, other than the author(s) of the reports or public figures such as Congressman McHugh;
- 2) information that identified specific sites under review, for security reasons (for example, where registered mail controls were deficient) or proprietary business reasons (where EXFC measurements were examined); and
- 3) other proprietary business information specific to a particular Postal Service facility, such as production rates and costs.

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  
David H. Rubin

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May 19, 2000