

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000 DOCKET NO. R2000-1

MOTION TO COMPEL RESPONSES TO INTERROGATORY DBP/USPS-207[a-j],
208[d], 219, 222-224, and 230-238 AND MOTION FOR LATE ACCEPTANCE [IF
NECESSARY].

May 26, 2000

Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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1. I wish to file a Motion to Compel responses to Interrogatories that the Postal Service has filed an objection to.
 2. To the extent that a Motion for Late Acceptance of this Motion to Compel may be required, I so move. I was away on a vacation and business trip from May 18 to 24, 2000. No party, other than myself, should be prejudiced by this delay.
 3. The data requested in DBP/USPS-207 [a-j] is desired to be able to properly brief the Postal Service's box rent proposal since the extent to which previous action to change rates from Fee Group C to either A or B will have an effect on the proposed rates in this Docket because of the overlap of box rental costs.
 4. The contract requested in DBP/USPS-208[d] is desired to fully evaluate the data which was presented for Englewood Cliffs.
 5. The response to DBP/USPS-219 is needed to clarify the response previously given to DBP/USPS-170[b] by indicating that all offices should have a final dispatch of 5 PM or later.
 6. The response to DBP/USPS-222 will affect the window costs for acceptance of Certified Mail.

7. The response to DBP/USPS-223 relates to the value of service for return receipts that are not properly completed when they only show the month and date of delivery and do not show the year.

8. The response to DBP/USPS-224 is needed to place into the record that the Postal Service formerly had a service of Return Receipt Showing Address Where Delivered and that this service was absorbed into the present service.

9. A response to DBP/USPS-230 is desired. This interrogatory is timely filed since all of the questions relate to the recent response of Witness Robinson. The fact that I could have asked these questions earlier is irrelevant. These questions are proper follow-up and relate to the latest response of the witness and are needed to clarify the misleading data which is being provided by the Postal Service to the mailing public with respect to delivery standards for Express Mail, Priority Mail, and First-Class Mail.

10. A response to DBP/USPS-231 through 238 is desired. If Commissioner Goldway felt that this area of discovery was important to inquire on, so do I. The Postal Service filed information in response to Commissioner Goldway's request and I am trying to clarify and follow-up on the material presented.

11. For the reasons stated, I move to compel responses to the referenced interrogatories.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin

May 26, 2000

