

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-246)  
(June 12, 2000)

The Postal Service hereby objects to interrogatory DBP/USPS-246, filed by David B. Popkin on May 31, 2000, and directed to the Postal Service.

Interrogatory DBP/USPS-246 asks the Postal Service to reanswer interrogatory DBP/USPS-212(b). That interrogatory claimed Mr. Popkin's awareness of "non-delivery offices that are charging box rents for eligible Fee Group E individuals," and asked whether such individuals would be entitled to a refund, and how far back it would go. In response, the Postal Service explained that non-delivery offices often charge box fees for certain customers, to help Mr. Popkin evaluate whether his conclusion about eligibility for Group E fees was correct. In case there are fee-paying customers eligible for Group E boxes, the response went on to provide the only specific DMM citations that would be relevant to a determination of entitlement to a refund. Thus, the Postal Service has already provided its best response to interrogatory DBP/USPS-212(b), so interrogatory DBP/USPS-246 is cumulative.

If Mr. Popkin is asking for more detailed research as to how the DMM would be applied in particular circumstances, the Postal Service objects on the basis of timeliness, relevance, and burden, as well as the lack of any factual foundation to apply. The

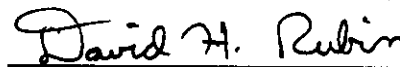
Postal Service's approach to refunds in this area is not at issue in this proceeding, and providing a response would take hours to identify knowledgeable individuals, and discuss how refund requests are handled in the various circumstances that might come up with regard to Group E eligibility. If Mr. Popkin believes that Group E box refunds should have been an issue in this proceeding, moreover, discovery could have been conducted during the normal discovery period, so this interrogatory is late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



David H. Rubin  
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  
David H. Rubin

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