

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(November 1, 2001)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objections to the following interrogatories, which were filed on October 25, 2001: DBP/USPS-58, 66(b), 67, 68.

These questions are part of a package filed on October 25th which included even more questions to which the Postal Service could have objected on the grounds of relevance. The Postal Service intends to respond to those questions, nevertheless, without waiving its right to object to follow-up questions which stray even farther away from the subject matter of the complaint in this proceeding.

DBP/USPS-58

This interrogatory asks the Postal Service to provide examples of satisfactory and unsatisfactory service standard change requests of a type which are not relevant to the complaint in this proceeding. The complaint relates to whether the finalization of Phase 2 of the service standard realignment plan reviewed in Docket No. N89-1 comports with 39 U.S.C. §§ 3661 and 3662. It involved changes between 2-day and 3-day service. Mr. Popkin's desire to explore what may or may not constitute a satisfactory request from a local office for an isolated change between overnight and 2-day service is irrelevant to the issues raised by the complaint. The decision-making process employed in response to local requests for isolated changes was not employed

in finalizing Phase 2. And Phase 2 did not involve any changes to overnight commitments, making the interrogatory doubly irrelevant. To the extent that the interrogatory inquires about capital and manpower and transportation costs of changes from overnight to 2-day service, it strays even farther afield of the issues in this proceeding.

DBP/USPS-66(b)

This interrogatory inquires about the possibility of plans to make changes to service standards in the future. Any such plans, should they exist, are irrelevant to the issues raised by the complaint in this proceeding, which pertain to whether the finalization of the Docket No. N89-1 realignment plan in 2000 and 2000 comports with §§ 3661 and 3662.

DBP/USPS-67

This interrogatory seeks information related to ZIP Code pairs where the Priority Mail service standard might be slower than the First-Class Mail service standard. Such information, while it might shed light on the very interesting topic of Priority Mail service, is irrelevant to the issue of whether the First-Class Mail service standard changes implemented in 2000 and 2001 comport with §§ 3661 and 3662.

DBP/USPS-68

The issues in the current proceeding relate to whether the finalization in the years 2000 and 2000 of Phase 2 of the realignment plan reviewed in Docket No. N89-1 complied with 39 U.S.C. § 3661 and whether the service standards produced from those efforts result in First-Class Mail service not being in compliance with the policies of the Act, within the meaning of 39 U.S.C. § 3662. This case is not about what the Postal Service might or might not do operationally as part of its response to the recent contamination of the mail stream via letters containing anthrax bacteria directed to

Messrs. Brokaw and Daschle and others. The subject matter is compelling. Nevertheless, the interrogatory seeks information completely irrelevant to the issues raised by the complaint in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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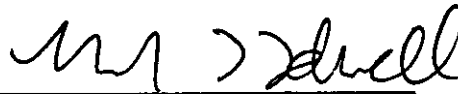
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CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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