

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, 2001

Docket No. R2001-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-72, 76(B))  
(December 6, 2001)

The United States Postal Service hereby objects in part to interrogatories DBP/USPS-72 and 76(b), filed on November 26, 2001, on the grounds of relevance, burden, commercial sensitivity, and overbreadth.

Interrogatory DBP/USPS-72 asks for "any information [in any category – separate or otherwise] that the Postal Service may have which indicates the level of service and/or compliance with the requirements for the Return Receipt service which has been developed at the Area level or above in the past eleven years." Interrogatory DBP/USPS-76(b) asks for "copies of any other letters [other than a March 2001 letter requested in part (a)] or directives regarding the proper procedures for handling Certified Mail and/or Return Receipts since the initial Commission concerns in Docket R90-1." To the extent these interrogatories ask for a search back through 11 years for any documents issued throughout the nation, related to return receipt level of service and compliance with requirements, and certified mail/return receipt procedures, they are unduly burdensome and overbroad. Documents issued at other than a national level during a lengthy period are difficult to locate, requiring checking with numerous current (and perhaps former) postal employees. Moreover, local documents and

documents issued before the base year in this docket would not be relevant to the issues in this proceeding.

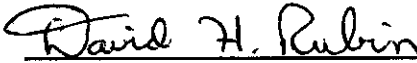
The Postal Service also objects to providing facility-specific volume information concerning return receipts and certified mail, on the grounds of commercial sensitivity and relevance. Such data are not needed to deal with issues in this proceeding, and can be used for competitive purposes by providers of alternative services for filing tax returns and other materials using certified mail.

The Postal Service will respond to these interrogatories by looking for responsive documents (or information) at Headquarters, issued from FY 2000 until the present. The Postal Service intends to redact facility-specific mail volume data. Older responsive documents may have already been provided in past proceedings.

Respectfully submitted,

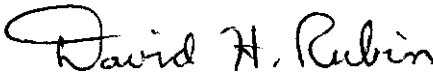
UNITED STATES POSTAL SERVICE

By its attorney:

  
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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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December 6, 2001