

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

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
DAVID B. POPKIN – DBP/USPS-84
(December 17, 2001)

The United States Postal Service hereby objects to interrogatory DBP/USPS-84.

This interrogatory is objectionable because the requested information is irrelevant.

DBP/USPS-84 is attached. A perusal of the questions makes clear that Mr. Popkin's fascination with all of the microscopic details of transportation, primarily in Alaska, continues. This series of questions supposedly follows up on the Postal Service's response to OCA/USPS-235, which admittedly gave some rather detailed information about transportation schedules for some small post offices, including 18 located in Alaska. The OCA interrogatory at least purported to be related to Express Mail service, although even it seemed to go beyond the real issues in this proceeding.

The latest interrogatory from Mr. Popkin, however, does not even attempt to relate to issues in the case. No subclass of mail, no rates or fees, no service standards are even mentioned. Rather, the questions relate purely to the fine points of transportation operations. This series of questions asks, among other things, what mode of transportation is used on HCR 56711, whether it travels through Canada, the

arrival and departure times between Angle Inlet and Oak Island, and whether certain Alaskan post offices are served by air or truck.¹

These questions are not relevant to any rate, fee or classification proposals made by the Postal Service in this proceeding. Further, the Postal Service is at a loss to see how they might relate to any proposal that any intervenor might make in this proceeding.

With hearings now underway, the Postal Service should not be forced to spend time responding to these irrelevant inquiries. The Postal Service objects to responding to these questions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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December 17, 2001

¹ The attachment to the response to OCA/USPS-235 contains a column entitled "Air Stop Code" which lists a three-letter abbreviation for each destination office, except for Chitina, where the entry reads "TRUCK," again hinting at the answer to the question.

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.



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ATTACHMENT TO
OBJECTION TO
DBP/USPS-84

BEFORE THE
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Postal Rate and Fee Changes, 2001]

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-84]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. The instructions contained in the interrogatories DBP/USPS-1-82, dated November 26, 2001, are incorporated herein by reference.

December 6, 2001 Respectfully submitted,

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

DBP/USPS-84 Please refer to your response to OCA/USPS-235. [a] For each of the twenty facilities, advise the days of the week that the listed service operates on. [b] For each of the twenty facilities, advise which, if any, of the legal holidays that the listed service operates on. [c] What mode of transportation is utilized for HCR route 56711 and does the route travel through Canada? [d] Confirm, or explain if you are unable to do so, that HCR route 56711 travels to Angle Inlet arriving at 11 AM and then travels to Oak Island arriving and departing at 11:55 AM and then returns to Angle Inlet and departs from there at 1:30 PM. [e] Confirm, or explain if you are unable to do so, that for the 12 Alaskan offices on the list showing a single time, that time is both the arrival and departure time. [f] Confirm, or explain if you are unable to do so, that for the 6 Alaskan offices on the list showing 2 times, that the first time is the arrival time and the second time is the departure time and that all times are on the same day [including Perryville where the second time is earlier than the first]. [g] Confirm, or explain if you are unable to do so, that all Alaskan offices shown are served by Air except Chitina which is served by truck. [h] Provide the origin of the flight or trip for the 18 Alaskan offices.

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 B. Popkin December 6, 2001
