

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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Complaint on First-Class Mail  
Service Standards

POSTAL RATE COMMISSION  
Docket No. C2001-3

MOTION TO COMPEL RESPONSE TO INTERROGATORIES THAT HAVE NOT BEEN  
FULLY RESPONDED TO

December 17, 2001

On December 10, 2001, the Postal Service filed Responses of the United States Postal Service to Interrogatories of David Popkin. The responses provided are not satisfactory.

Respectfully submitted,

December 17, 2001 David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

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DBP/USPS-106 My original Interrogatory was as follows:

DBP/USPS-57 [a] Is there any written material that provides guidelines for the present criteria that is utilized to convert the DMCS requirement for First-Class Mail receiving expeditious handling and transportation [DMCS 252] to the actual 1-, 2-, or 3- day delivery standard? If so, please provide copies. If not, please explain how decisions on requested changes are evaluated.

The first response that I received directed me to look at a 90-page manual filed as a library reference. I followed up with DBP/USPS-106 and now have been told that:

The Postal Service considers responsive all portions of the manual that do not refer exclusively to another class of mail.

I don't believe that it is responsive to provide a 90-page manual and refer me to either the full manual or to some portion of the manual without providing page or section references that are responsive to the original interrogatory.

DBP/USPS-111 I asked for two specific drive times in my original DBP/USPS-85 subpart q as between Atlanta and Montgomery and South Florida and Miami. I did not

specify a direction and was told that Atlanta and Montgomery to South Florida did not exist. I reworded the interrogatory to clarify the obvious and now I am being told to look up the data in a library reference or to model it myself. This data is relevant to the evaluation of the difference in service standards between South Florida and Miami and the Postal Service can provide the two drive times as well as confirm that the data that they provided from Atlanta and Montgomery to Miami [which was not asked for] is the same as the reverse direction which is desired.

For the reasons given, the Postal Service should be compelled to provide the answers to those interrogatories where they have not provided a responsive answer.

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

December 17, 2001

David B. Popkin