

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO MOTION OF DAVID B. POPKIN TO COMPEL A RESPONSE TO
DBP/USPS-30**

The United States Postal Service hereby responds to Mr. Popkin's Motion to Compel a response to DBP/USPS-30. Mr. Popkin's Motion was filed on December 17, 2001.¹

This interrogatory asks the Postal Service to confirm a number of self-evident statements about Stamped Cards, based on the definitions in sections 962.11, 222.11, and 6020 of the Domestic Mail Classification Schedule (DMCS). These questions essentially ask for confirmation of the wording of the classification language. The Postal Service objected to this interrogatory on grounds that it was burdensome, given that the answer would reveal nothing more than what the casual reader could independently conclude by simply reading the classification language.

Mr. Popkin challenges the objection on grounds that the Postal Service has failed to document the burden. Reading, objecting to, preparing, and reviewing the response has consumed more than one hour of professional time, which translates into a substantial cost to the Postal Service. While it may be relatively small in the larger context of an omnibus rate proceeding, the Postal

Service submits that nobody would pay the fair market value for this professional time to get the benefit of the information contained in the response.

The Postal Service nevertheless does not wish to waste the Commission's time or resources in ruling on the motion to compel. For the sake of expediency, the Postal Service is today filing a response to this interrogatory. By doing so, it does not intend to waive its objection to this interrogatory or any follow-up or related discovery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

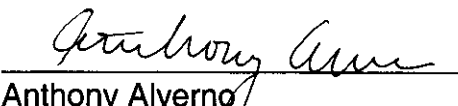
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

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.


Anthony Alverno

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December 20, 2001

¹ The Postal Service will respond to other portions of Mr. Popkin's Motion separately.