

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

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OFFICE OF THE SEC

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
DAVID B. POPKIN – DBP/USPS-101
(December 27, 2001)

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

101. This interrogatory is objectionable because the requested information is irrelevant.

DBP/USPS-101 provides:

Please refer to your response to DBP/USPS-73, subpart b. Can you provide me with examples of offices on the west coast that are "nearby" enough to each other that they will be within the third zone to each other and yet will normally process Priority Mail between them via the FedEx Memphis hub? If so, provide the examples.

Evidently Mr. Popkin is concerned that extra transportation costs will be incurred by sending Zone 3-rated Priority Mail through the FedEx Memphis hub. If this is Mr. Popkin's concern, it is irrelevant. It is the Postal Service's business, not Mr. Popkin's or other participant's or the Commission's, to best decide on the proper and most efficient routing of mail. Moreover, whether a piece goes back and forth on FedEx through the Memphis hub does not necessarily mean greater or lesser transportation costs. As witness Pickett has stated, "Test Year FedEx network costs are treated as non-distance related in light of the fact that there is no mileage component to the rates FedEx charges for transportation service." USPS-T-17, at 3.

The operational details of what mail from what office does or does not go through the FedEx Memphis hub is not materially related to the issues in this proceeding. The Postal Service thus should not be required to answer this interrogatory

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
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