Jan 7 4 05 PM '02

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

POSTAL FARE THE DU NOT OFFICE OF THE SECRETARY

Complaint on First-Class Mail Service Standards

Docket No. C2001-3

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY DBP/USPS-141 (January 7, 2002)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this objection to the following interrogatory filed by Mr. Popkin on January 4, 2002: DBP/USPS-141.

The interrogatory seeks to explore why the service standards for the Priority Mail subclass do not precisely match the service standards for the two First-Class Mail subclasses (Letters and Sealed Parcels, Cards) that are the subject of this proceeding.

Since the service standards for the Priority Mail subclass are not at issue in this proceeding, the Postal Service interprets this interrogatory as requesting information that is irrelevant and unnecessary to a resolution of the issues raised by the complaint in this docket. An exploration of the development of the service standards for Priority Mail will not advance the resolution of the two questions before the Commission:

- (a) whether the service standard changes (for the Letters and Sealed Parcels and Cards subclasses) described in the complaint were implemented in a manner consistent with the requirements of section 3661; or
- (b) whether the service (to the Letters and Sealed Parcels and Cards

subclasses) resulting from those changes complies with the polices of the Postal Reorganization Act, within the meaning of section 3662.

Accordingly, the Postal Service objects to DBP/USPS-141.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel Ratemaking

Michael T. Tidwell

Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

Michael T Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268-2998/ FAX: -5402 January 7, 2002