

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES  
DBP/USPS-90 / 123[b-d] / 124 through 129 / 130[a-c] / 131 through 138.  
January 10, 2002

I move to compel response to the interrogatories submitted to the United States Postal Service that were objected to by them.

Respectfully submitted,

January 10, 2002

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

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DBP/USPS-90      Once the ruling is made on DBP/USPS-84, the ruling should apply to this interrogatory.

DBP/USPS-123[b-d] / 124 through 129 / 130[a-c] / 131-135. These interrogatories attempted to follow-up on the processing of return receipts at various locations throughout the country as noted in various attachments to the response to OCA/USPS-236. The processing of return receipts is closely associated with the processing of the Certified Mail as has been stated many times by the Postal Service<sup>1</sup>. The method of processing return receipts has been in many recent rate cases and is in this rate case is relevant as to the extent to which the processing of them is completed by the Postal Service in accordance with its own regulations. It is interesting that the Postal Service claims that the practices are not uniform by Area. There is only one Manual and that applies to the entire country. The extent to which there are deviations from that one Manual is relevant to this Docket and the value of service and therefore warrants the burden to obtain. These interrogatories are proper follow-up on the material provided in response to OCA/USPS-236. The claim that they could have been asked prior to

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<sup>1</sup> See for example the response to DBP/USPS-109 subparts a-c.

November 26<sup>th</sup> is irrelevant; any interrogatory could have been asked prior to that date. These interrogatories are necessary to clarify and elaborate on the response to OCA/USPS-236.

DBP/USPS-136 The processing of Delivery Confirmation at recipients of large volumes of Delivery Confirmation, such as IRS and state tax agencies, is relevant to the value of service. The response to OCA/USPS-236 related to the isolation of Priority Mail with Delivery Confirmation does relate to the proper scanning of these articles at the time of delivery. Once again, any interrogatory could have been asked prior to November 26<sup>th</sup>; this interrogatory is an appropriate effort to clarify and elaborate on the isolation of Priority Mail with Delivery Confirmation. To the extent that there is a burden to account for different procedures at various facilities, the burden is worth the effort since there should only be one standardized procedure.

DBP/USPS-137 This chart was provided in the response and the interrogatory was a proper follow-up to clarify and elaborate on the information contained on this chart. To the extent that the chart is relevant to the proper processing of accountable mail, it is relevant to the value of service.

DBP/USPS-138 The flow charts provided in the response relate to the value of service for Certified Mail and return receipt service. Once again, any interrogatory could have been asked prior to November 26<sup>th</sup>; this interrogatory is an appropriate effort to clarify and elaborate on the processing of Certified Mail and return receipts at Hartford. The degree of burden has not been specified as required in the Commission's Rules of Practice.

For the reasons stated, I move to compel responses to the referenced interrogatories.

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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.

January 10, 2002

David B. Popkin