

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

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COMMISSIONER

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN
(DBP/USPS-139)
(January 14, 2002)

The United States Postal Service hereby objects to interrogatory DBP/USPS-139, filed on January 4, 2002, on the grounds that it is untimely and is not proper follow-up. The interrogatory is as follows:

DBP/USPS-139 Please refer to your response to DBP/USPS-92. [a] With respect to the unzoned Priority Mail rates that presently exist for weights up to 5 pounds, [1] have these rates been popular since they were established? [2] to what extent do competitors offer a similar unzoned rate structure? [3] to what extent do these unzoned rates provide simplicity, as well as convenience to the Postal Service? [4] to what extent do these unzoned rates provide simplicity, as well as convenience to the user? [5] to what extent do these unzoned rates help the Postal Service's position in the market? [b] Do your answers to subpart a apply equally to weights between 1 and 5 pounds as they do to weights up to 5 pounds? If not, explain any difference.

The interrogatory is framed as a follow-up, but even casual inspection of the interrogatory it purports to follow-up falsifies this characterization:

DBP/USPS-92 Please refer to your response to DBP/USPS-74 subpart c. My interrogatory asked for the reasons [and the level of significance of each] why Express Mail rates were changed from a zoned rate system to an unzoned rate system. Which particular lines on page 588 of Docket R84-1 provide the response to this specific question?

RESPONSE: See paragraph [5659].

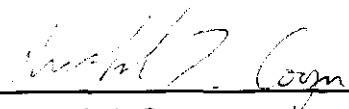
It is apparent from the excerpts above that the questions now posed in interrogatory DBP/USPS-139 could have been posed at any time during this proceeding, and do not hinge on the three-word paragraph citation provided in response to interrogatory DBP/USPS-92. The Postal Service thus objects that interrogatory DBP/USPS-139 is not proper follow-up and is untimely.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

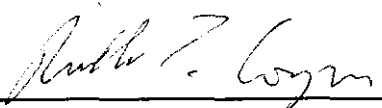


Richard T. Cooper

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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.



Richard T. Cooper

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January 14, 2002