

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

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-142, 143, 147, 148, 149, 157, and 158)
(January 22, 2002)

The United States Postal Service hereby objects to interrogatories DBP/USPS-142, 143, 147, 148, and 149, filed on January 10, 2002, and DBP/USPS-157 and 158, filed on January 17, 2002, on the grounds that they are cumulative, irrelevant, immaterial, burdensome, and improper follow-up.

Interrogatory DBP/USPS-142 asks whether particular words are used in an attachment to the response to DBP/USPS-76(a). This interrogatory is cumulative and lacks relevance to the issues in this proceeding. Mr. Popkin can answer his own question without the need for discovery, simply by reviewing the attachment. The Postal Service has already explained, in responding to interrogatory DBP/USPS-109, how the attachment relates to return receipt service regardless of the particular words used.

Interrogatory DBP/USPS-143 asks for an analysis of the time periods after mailing during which two return receipt options can be exercised. The questions are improper follow-up, since Mr. Popkin could have raised this analysis earlier in his discovery. He presumably had this issue in mind when he first asked about the time period for electronic return receipt, and other comparisons between electronic return receipt and return receipt after mailing, so he should have pursued the issues raised by interrogatory

DBP/USPS-143 at that time. In any case, the analysis lacks relevance to any issue in this proceeding.

Interrogatory DBP/USPS-147 is *cumulative*, asking for a new format for the answer to previous interrogatories. The Postal Service believes it has already provided information to respond to this interrogatory, consistent with the requests in Mr. Popkin's earlier interrogatories. The interrogatory also is irrelevant to any issues in this proceeding.

Interrogatories DBP/USPS-148, 157, and 158 ask for more details about the return receipt procedure for two facilities. The Postal Service has tried to be responsive in prior responses (e.g., interrogatories DBP/USPS-130 and 138), but it is now apparent, based on these interrogatories, that Mr. Popkin is interested in an excessive amount of operational minutiae about these facilities. These questions are cumulative, burdensome, and lack relevance to any issue in this proceeding.

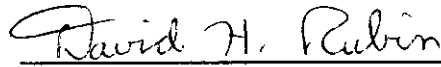
Interrogatory DBP/USPS-149 asks for a list of facilities that turn over return receipts prior to obtaining a signature. This interrogatory is *cumulative and burdensome*, and lacks relevance to any issue in this proceeding. The Postal Service has already

stated that such a list does not exist. A nationwide study to develop such a list would require hundreds of hours, and thus would be unduly burdensome.

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorney:



David H. Rubin

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.



David H. Rubin

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