

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-143, 147, 148, 157, 158, and 149

January 28, 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 28, 2002

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

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DBP/USPS-143 This interrogatory is proper follow-up. Once it was determined that the electronic return receipt could only be obtained for a 6-month period as opposed to the 2-year period that a return receipt after mailing could be obtained, it became appropriate to find out why there was a difference since apparently the same data base is utilized. It is relevant to the value of service.

DBP/USPS-147 The Postal Service continues to refuse to respond to my interrogatories. I am looking for a narrative of the steps taken to provide the service and not just to the requirements. This is needed to evaluate the difference in costs between the two methods of obtaining a return receipt after mailing. I wish it was cumulative, but they have never responded to the original request.

DBP/USPS-148 The response to subparts g and h have yet to be provided.

DBP/USPS-157 and 158 These interrogatories are a valid follow-up to the previous response. They are not cumulative since they raise questions based on the response.

The claim of burden is not substantiated as required. The responses are relevant since they apply to the proper handling of return receipts and therefore to the value of service.

DBP/USPS-149 The original interrogatory asked for a listing of those high volume recipients of return receipts that are given their certified mail before obtaining the signatures on the return receipt. The response stated, "A listing of this nature has not been compiled." Interrogatory DBP/USPS-149 requests the data. If the listing is not available, then it should be prepared. A request for a list of information of a specific condition should not be able to be avoided by just stating that the specific list does not exist. The list obviously should be prepared for the response. The Postal Service did not offer to provide a listing that might be less burdensome to produce.

The responses are needed to determine the extent to which return receipts are being properly handled and therefore to the value of service.

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 28, 2002

David B. Popkin