

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

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF DAVID POPKIN  
(November 8, 2002)

The United States Postal Service hereby submits its objections to the following interrogatories filed by Mr. Popkin on November 1, 2002: DBP/USPS-146(f) through (k).

Broadly speaking, this proceeding was instituted for the purpose of resolving two related, but independent issues: whether the First-Class Mail service standard changes at the heart of this proceeding were implemented in a manner consistent with the terms of 39 U.S.C. § 3661; and whether, on at least a substantially nationwide basis, the service resulting from those changes fails to conform to some policy of the Postal Reorganization Act.

Through discovery, the parties in this proceeding have explored various facets of the implementation of the disputed service standard changes and their impacts. The Postal Service has recognized the need for some leeway in allowing the parties to explore the issues raised by the complaint in this proceeding. Accordingly, the Postal Service has exercised restraint in objecting to numerous discovery requests that, in its view, seek information that is neither necessary nor relevant to the material issues raised by the complaint. However, there are limits.

Mr. Popkin's most recent interrogatory subset contains a string of questions, in subparts (f) through (k) of DBP/USPS-146, about postal operations in California on a micro-local level. The interrogatories request:

- (f) the departure time of trucks from the Eureka P&DC to associate offices;
- (g) the arrival time of trucks at the Crescent City and Smith River post offices;

- (h) the name of the post office that receives mail last from the Eureka P&DC and the scheduled arrival time for that truck;
- (i) the extent to which mail for Eureka P&DC associate offices is sorted at the Eureka P&DC to carrier route or in walk sequence;
- (j) the extent to which other P&DC's sort mail destined for the Eureka; and
- (k) the degree to which trucks (in and out of Eureka?) deviate from their scheduled arrival times.

The answers to these questions, whatever they may be, would provide not iota of information that has any bearing on any material issue in this proceeding. As the requested information is nether relevant nor necessary to a determination of the issues in this proceeding, the Postal Service should not be burdened with expending its limited resources in its pursuit.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

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### **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.

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Michael T. Tidwell

November 8, 2002