

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

DAVID B. POPKIN
MOTION TO COMPEL RESPONSE TO DBP/USPS-T1-51

January 12, 2005

Respectfully submitted,

January 12, 2005

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

MC20051J

On January 5, 2005, the Postal Service made a partial objection to responding to my interrogatory DBP/USPS-T1-51 that was submitted by me on December 22, 2005. This partial objection which was filed two days late promised a partial response. This partial response has yet to be filed even though it has now been three weeks since the original interrogatory was filed. Unfortunately, my need to file this Motion to Compel at this time must be made without the ability to see if the partial response contained sufficient information to resolve my concerns.

In general, my interrogatory was designed to allow the participants to evaluate the differences between "normal forwarding" and the proposed PFS. This would allow for the ability to determine the value of this proposed new service when compared to the existing forwarding, both temporary and permanent, programs.

Subparts b through d attempt to determine the time frames that the existing forwarding system provides so it can be compared to the proposed PFS which utilizes Priority Mail as its basis. This will allow for a better determination of the value of service of PFS. Similarly, subpart e will allow for the comparison of the handling of the different classes of mail.

For the above reasons, I move to compel a response to DBP/USPS-T1-51.

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 12, 2005

David B. Popkin