

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO DAVID B. POPKIN INTERROGATORY, DBP/USPS-T1-59
(January 24, 2005)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatory DBP/USPS-T1-59, submitted by David B. Popkin on January 12, 2005, which reads as follows:

DBP/USPS-T1-59.

- (a) If I take an orange Priority Mail pouch, insert articles into it, close the pouch, affix an address tag to the pouch, affix postage to the tag as required by the weight, shape, and destination of the pouch, is this mailable?
- (b) If not, why not?

The Postal Service objects to this interrogatory on the grounds of relevance. In asking whether he could mail an orange Priority Mail pouch if he properly addressed it and affixed the requisite postage, Mr. Popkin has raised a question concerning mailability standards for customers. Under Premium Forwarding Service (PFS), however, it would be the primary address post office which is entering pieces into the mail stream (specifically, the weekly PFS shipment and all mail pieces sent outside that shipment), not customers. As such, questions concerning what containers can, and cannot, be entered in the mail stream by individuals are beyond the scope of this

proceeding.¹ This is especially true considering that this is a limited proceeding being heard by the Commission under its rules for experiments.²

For the foregoing reasons, the Postal Service objects to interrogatory DBP/USPS-T1-59 on the grounds of relevance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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¹ The Postal Service has indicated throughout the record what containers it would use for the PFS package. See, e.g., Response of Witness Cobb to DBP/USPS-T1-2.

² See Tr. 1/5.