

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN
(DBP/USPS-72)
(May 26, 2005)

The United States Postal Service hereby objects to interrogatory DBP/USPS-72, filed by David Popkin on May 16, 2005. This interrogatory asks about

the validity of the various United States postage stamps that have been issued since 1860 for use in paying either postage or fees [for example, while a 15¢ Certified Mail stamp may not be used to pay the postage on a Certified Mail letter, may one or more of them be used to pay part or all of the Certified Mail fee] on a mailpiece.

The interrogatory specifically asks about the validity of special purpose stamps such as Certified Mail, Special Delivery, Special Handling, Registry, and Newspaper stamps.

This interrogatory is very similar to interrogatory DBP/USPS-68 from Docket No. R97-1. Parts (a-p) of that interrogatory asked for confirmation of the issuance of postage stamps and more than 10 special purpose stamps, including the ones specified in Docket No. R2005-1's interrogatory DBP/USPS-72. Then, interrogatory DBP/USPS-68(q) asked:

With respect to each of the categories listed in subparts a through p, advise the use that may be made of these stamps by an individual mailer. Only consider stamps issued since 1860. If possible, limit your response to one or more of the following responses: 1. for all postage and fees, 2. for all postage but not for any fees, 3. for only the fee for the category shown on the stamp, 4. for use by the USPS only, 5. for

use by an authorized government agency only, or 6. no use may be made.”

After the Postal Service’s objection to the Docket No. R97-1 interrogatory, the Commission denied Mr. Popkin’s motion to compel responses to parts (a-q), stating that these stamps “may be of interest to Mr. Popkin, but they are irrelevant to the R97-1 proceeding.” Presiding Officer’s Ruling No. R97-1/53, at 8.¹ Similarly, interrogatory DBP/USPS-72 lacks relevance to this docket. Moreover, responsive information is already available in DMM §§ 604.1.2 and 604.1.3. The Postal Service therefore objects to interrogatory DBP/USPS-72.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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¹ The Presiding Officer did direct the Postal Service to respond to parts (r-t), which asked about the options for special purpose stamps for a service that is “eliminated or reduced.” These questions are not included in the current interrogatory, and this docket does not involve the elimination or reduction of any mail classes or special services.