

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 B. POPKIN
(DBP/USPS-75(e))
(May 27, 2005)

The United States Postal Service hereby objects to interrogatory DBP/USPS-75(e), filed by David B. Popkin on May 17, 2005. This interrogatory asks for the number of International Registered Mail pieces, separated by outgoing and incoming mail, for FY 2000 through FY 2004. The Postal Service objects to providing these international data because of their lack of relevance to this proceeding.

In this docket, the Postal Service has only proposed changes to domestic postal services, not international products or services, which lie outside of the Commission's jurisdiction. We appreciate what we assume to be the general intent of the interrogatory to gain a better overall understanding of the circumstances and conditions leading to the estimate of test year costs, and the proposed fees, for domestic Registered Mail. Nevertheless, detailed inquiries into international Registered Mail will not advance that understanding, and will only detract from the goal of efficient and expeditious review of the Postal Service's Request. In this regard, a detailed volume history of the international special service will not illuminate costing and pricing of the domestic service, and is not likely to lead to discovery of admissible evidence pertaining

to the Postal Service's proposal.

The Postal Service is planning to respond to other parts of this interrogatory that refer to the international service, namely, parts (f), (g), and (h), which arguably will help clarify understanding of domestic operations and how costs for the domestic service are allocated. However, the specific historical volumes of international Registered Mail are irrelevant to the costs and revenues of domestic Registered Mail, as will be shown in the responses the Postal Service will file to other parts of this interrogatory. The Postal Service therefore objects to interrogatory DBP/USPS-75(e).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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