

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-88)
(June 6, 2005)

The United States Postal Service hereby objects to interrogatory DBP/USPS-88, filed by David B. Popkin on May 17, 2005. The interrogatory reads as follows:

DBP/USPS-88. Please refer to your response to DBP/USPS-49 subpart h. Please provide a similar listing to the response provided in Docket R2001-1 Interrogatory DBP/USPS-65 subpart d. Please provide a listing and details of all post offices that do not send or receive shipments of Express Mail on all days of the week Monday through Saturday except for holidays. Are shipments made on some or all of the legal holidays? If so, please provide the details.

As explained in the Postal Service's motion for late acceptance of this objection,¹ circumstances led to the undersigned counsel not learning until today that providing an updated list along the lines requested by Mr. Popkin would require hundreds and hundreds of work hours, but also that any such list would be substantially identical to the one provided in Docket No. R2001-1. In light of this information, the Postal Service has today filed a response to this interrogatory stating that any updated list would be substantially identical in both size and scope to the one provided by the Postal Service

¹ See Motion of the United States Postal Service for Late Acceptance of the Objection of the United States Postal Service to Interrogatory DBP/USPS-88 (June 6, 2005).

in Docket No. R2001-1.² The Postal Service believes that this response is adequate in the context of this proceeding.

To the extent that Mr. Popkin or another participant disagrees, however, and thereby seeks a response beyond the one provided by the Postal Service, the Postal Service objects on the ground that providing an updated list would be unduly burdensome. As the Postal Service notes above, as well as in its response to this interrogatory, an updated list would not differ in any meaningful way from the one provided in Docket No. R2001-1. It is therefore unnecessary and unduly burdensome for the Postal Service to have to dedicate resources for hundreds and hundreds of work hours to actually update the list, effort that at the most would discover only minor differences from the one provided in the last case. This is especially true considering the attenuated relevance of the requested information to this proceeding.

Therefore, to the extent that its response to DBP/USPS-88 is deemed insufficient by any participant, the Postal Service objects to that interrogatory on the grounds of undue burden.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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² See Response of the United States Postal Service to Interrogatory of David B. Popkin (DBP/USPS-88).