

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-90)  
(June 8, 2005)

The United States Postal Service hereby objects to interrogatory DBP/USPS-90, filed by David Popkin on May 16, 2005. This interrogatory asks:

The USPSNEWSLINK for today, May 27, 2005, indicates that there is a new course for Registered Mail training - course number 31500-00. Please file a copy of all course material for this course as well as any other training material for handling/processing Registered Mail as a Library Reference in this Docket and furnish me with a copy of the same material.

The Postal Service has identified two training guides and one videotape used for Registered Mail training. The Postal Service objects to providing this material because it reveals the particular practices involved in maintaining the security of Registered Mail. For example, it shows the places that Registered Mail is kept, as well as the procedures for transferring Registered Mail among employees. Revealing this information to the public, including rate case intervenors, would compromise the security that is the key component of Registered Mail. The training materials also show how internal Postal Service remittances are moved, a separate security issue.

These training materials are not needed to address the Registered Mail issues in this proceeding. They do not provide cost or revenue analyses, or show any recent changes to Registered Mail practices.

The Postal Service therefore objects to interrogatory DBP/USPS-90, on the grounds of materiality and confidentiality.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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