

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

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN  
(DBP/USPS-145)  
(June 17, 2005)

The United States Postal Service hereby objects, in part, to interrogatory DBP/USPS-145, filed by David Popkin on June 7, 2005, on the grounds of burden, relevance, and materiality. This interrogatory asks the Postal Service to:

describe in detail the steps and processes that are involved in the delivery of the following types of mail from the time that it arrives at the delivery post office until the article has been delivered and all of the actions associated with the delivery are completed:

- [1] A mailpiece sent Certified Mail
- [2] A mailpiece sent Certified Mail with an Electronic Return Receipt
- [3] A mailpiece sent Certified Mail with a hardcopy Return Receipt [PS Form 3811]
- [4] A mailpiece with Delivery Confirmation

sent to each of the following addresses:

- [a] A single mailpiece sent to a typical residential address in Englewood NJ or a similar sized post office.
- [b] Mail sent to Internal Revenue Service, Andover MA 05501.
- [c] Mail sent to Internal Revenue Service, Philadelphia PA 19255
- [d] Mail sent to Internal Revenue Service, Memphis TN 37501.
- [e] Mail sent to Internal Revenue Service, Atlanta GA 39901
- [f] Mail sent to Internal Revenue Service, Kansas City MO 64999
- [g] Mail sent to Internal Revenue Service, Austin TX 73301

- [h] Mail sent to Internal Revenue Service, Fresno CA 93888
- [i] Mail sent to government agencies in Washington DC ZIP Codes 202-205.

If different steps and processes are utilized with the IRS depending on whether it is during the tax season as opposed to not during the tax season or for any other reason, please describe all steps and processes and the condition under which they are utilized.

If different steps and processes are utilized with the Washington DC post office depending on the size or type of agency or for any other reason, please describe all steps and processes and the condition under which they are utilized.

Please indicate in each of your detailed explanations the point at which the control of the mailpiece is transferred from the Postal Service to the addressee,[sic]

This interrogatory thus asks for a detailed description of the delivery process for four types of mail addressed to nine different delivery locations, or 36 different descriptions. Additional descriptions are required if different processes are used during the tax season, compared to other times, and if different processes are used for different types of government agencies in Washington, D.C. Providing a full response would be unduly burdensome, requiring at least 90 hours if each description takes 45 minutes to research (with a headquarters postal employee talking to a field employee, that is, two times  $\frac{3}{4}$  hours) and another hour to write-up the response.

Instead, the Postal Service plans to provide some description related to Mr. Popkin's requests, based on the process at some IRS facilities. This response, in conjunction with the response to DBP/USPS-144, should address Mr. Popkin's apparent concern about whether the Postal Service ever delivers Certified Mail to the IRS prior to obtaining the signed return receipt from the IRS. This is an issue which has

been addressed in each of the last three rate cases, without the detailed process descriptions requested by Mr. Popkin in this interrogatory. The Postal Service therefore believes that the details requested by Mr. Popkin are neither relevant nor material to this proceeding, and certainly do not justify the burden of preparing a full response.

The Postal Service therefore objects in part to interrogatory DBP/USPS-145.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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