

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-147)
(June 17, 2005)

The United States Postal Service hereby objects to interrogatory DBP/USPS-147, filed by David B. Popkin on June 7, 2005. The interrogatory reads as follows:

DBP/USPS-147. If a post office provides retail window service and/or collection from an Express Mail collection box on a Sunday, will the overnight service area be the one that is normally in use during the week, such as on a Tuesday for delivery on Wednesday, or will it be the one that is utilized for Saturday to Sunday delivery (except that delivery will be to every office rather than the restricted Sunday/holiday list)? If neither, please describe.

The Postal Service objects to this interrogatory on the grounds of relevance. Any response that the Postal Service could provide to this interrogatory would not be material to any consideration that the Commission may make of Express Mail in this proceeding, including its value of service. As the Presiding Officer has noted, Commission precedent establishes a “rule of reason [which] limits the extent to which operational details [of Express Mail] are appropriate for exploration in discovery.”¹ The Postal Service believes that the operational information sought in this interrogatory clearly falls runs afoul of this rule of reason. Only a very small percentage of Express

¹ See Presiding Officer’s Ruling No. R2005-1/19 (June 7, 2005), at 3.

Mail (less than 1%) is accepted on Sunday, and it is not apparent why an intra-subclass evaluation of how acceptance of an Express Mail piece on a Sunday may affect the availability of certain service commitments to certain destinations relative to a piece accepted on other days of the week would be relevant to the Commission's recommendation of Express Mail rates.

The Postal Service therefore objects to this interrogatory on the grounds of relevance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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