

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

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF DAVID POPKIN [DBP/USPS-264(c&f) AND 274]  
(July 19, 2005)

The United States Postal Service hereby files its objections to the above-referenced interrogatories filed by David Popkin on July 11 and 18, 2005, respectively.

DBP/USPS-264(c) and (f)

This interrogatory contains six questions that compare the current practice distributing non-denominated basic rate First-Class Mail postage stamps whose images match the denominated stamps that succeed them and the former practice of issuing alphabetically-denominated stamps for use while denominated stamps were being printed to succeed them. Subpart (c) seeks an explanation of why the Postal Service abandoned the former practice after the Docket No. R97-1 "H" stamp in favor the current practice. The Postal Service objects to this question as seeking information irrelevant to the issues in this proceeding. The Postal Service intends to continue the current practice. Wistful nostalgia about the past practice has its place, but that place is not discovery in the current docket. The Postal Service also objects to subpart (f) of this interrogatory. It is irrelevant to this proceeding why the Postal Service has no plans to return to a practice abandoned three omnibus rate implementation regimes ago.

DBP/USPS-274

Despite its conviction that such information is irrelevant to postal ratemaking, the Postal Service answered interrogatory DBP/USPS-231 with a response confirming that EXFC overnight and 2-day and 3-day scores are given different weights when factored into postal management pay increases, depending on the management employee's job classification. By providing illustrative examples in its answer, the Postal Service's response sought to be as clear as possible and, more importantly, without burdensome motions practice, to bring an end to a line of inquiry that has strayed far beyond the realm of postal ratemaking.

Unfortunately, the Postal Service's reward was to receive interrogatory DBP/USPS-274, which seeks to have the Postal Service describe the manner in which EXFC scores are factored into the compensation formulas for six different categories of management employees. The Postal Service objects to this interrogatory as requesting data irrelevant to the issues in this proceeding. Postal management pay administration is a matter beyond the scope of the Commission's limited review of requests for changes in postal rates and classifications. There is not a single rate or classification determination pending before the Commission that could be affected by whether overnight or 2-day or 3-day EXFC scores are weighted differently in the compensation formulas for postal Area Vice Presidents vs. local post office supervisors. This interrogatory is an abuse of discovery for the purpose of pursuing data irrelevant to this docket and beyond the scope of the Commission's responsibilities. Accordingly, the Postal Service objects.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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