

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 8/3/2005 8:58 am
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Postal Rate and Fee Changes]
Pursuant to Public Law 108-18]

DOCKET NO. R2005-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-
260 AND 261.

I move to compel responses to the interrogatories submitted to the United States Postal Service that have been objected to by them.

August 3, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051YYmtc260

On July 11, 2005, I submitted Interrogatories DBP/USPS-260 and 261. On July 21, 2005, the Postal Service filed an objection to these interrogatories on the basis of relevance.

The interrogatories read as follows:

DBP/USPS-260 Please refer to your response to DBP/USPS-203. The original interrogatory requested the steps and methods to reduce missed collections as it relates to a minimum of four potential methods. [a] Please specifically discuss collection box tests the Postal Service makes and how it reduces missed collections. [b] Please specifically discuss scanning boxes on collection that the Postal Service does and how it reduces missed collections. [c] Please specifically discuss downloading scanning results that the Postal Service does and how it reduces missed collections. [d] Please specifically discuss follow-ups on missed or early collections that the Postal Service does and how it reduces missed collections. [e] Please specifically discuss any other steps and methods taken by the Postal Service to reduce missed collections other than other than implementing the CBMS and establishing dedicated collection routes [the two items provided in your response to DBP/USPS-203].

DBP/USPS-261 Please refer to your response to DBP/USPS-203. [a] Please advise when the Collection Box Management System was implemented and describe the system that was in place prior to its implementation. [b] Please specifically describe how the implementation of the Collection Box Management System helps the Postal Service reduce missed collections.

The original interrogatory in this series, OCA/USPS-119, appeared to inquire as to the factors and their ranking as to why there were failures in the various EXFC results. In their response, the Postal Service provided a number of factors for late First-Class Mail including missed collections. My interrogatory DBP/USPS-203 attempted to follow-up on the missed collection failure as a factor in late First-Class Mail and asked a number of specific questions related to missed collections. The Postal Service did not respond to my specific questions in the interrogatory but only provided a general response. Interrogatory DBP/USPS-260 attempted to follow-up in an effort to obtain the information that was specifically asked for in interrogatory DBP/USPS-203 and not provided by the Postal Service.

The response to DBP/USPS-203 also indicated a change to a new Collection Box Management System. Interrogatory DBP/USPS-261 attempted to determine the implementation date of the new system and the changes and effects that it provides.

Both of these interrogatories relate to the value of service for First-Class Mail as measured by the EXFC program and therefore are relevant to this Docket. They are related to the inability of the Postal Service to provide a value of service which would discuss the failure to achieve 100% delivery in each of the three EXFC categories, namely, overnight, 2-day, and 3-day delivery.

For the reasons stated, I move to compel responses to the referenced interrogatories since they are reasonably calculated to lead to the discovery of admissible evidence.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin August 3, 2005
