

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
INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-306-307, 310)
(August 25, 2005)

The United States Postal Service hereby objects to interrogatories DBP/USPS-306-307 and 310, submitted by David B. Popkin on August 15, 2005.

DBP/USPS-306

This interrogatory reads as follows:

DBP/USPS-306. Please refer to your response to DBP/USPS-213. You have indicated that A-Label Express Mail availability is based primarily on the availability of transportation necessary to meet the 10:00 AM delivery commitment. You have further indicated that A-Label Express Mail may be sent from all post offices throughout the country (except for Military ZIP Codes) to the 7200 post offices. Please explain why A-Label Express Mail may not be sent to other offices where there is already existing transportation is available such as those offices that are within the overnight First-Class Mail service areas (such as from Englewood NJ 07631 to Paramus NJ 07652).

The Postal Service objects to this interrogatory on the grounds of relevance. The Postal Service has provided, in its response to DBP/USPS-210, a list of all 7200 available destinations for A-Label Express Mail. In addition, as indicated in this interrogatory, the Postal Service has already indicated that inclusion on that list depends primarily on the Postal Service's ability to meet the 10 AM commitment for such mail. Further operational details as to why certain ZIP Codes (such as ZIP Code

07652) are not on the list of available A-Label destinations are, however, irrelevant to this proceeding.

DBP/USPS-307

This interrogatory reads as follows:

DBP/USPS-307. Please refer to your response to DBP/USPS-211 subparts a and b. The interrogatory asked how one would determine which 5-digit ZIP Codes in Los Angeles 900 have the availability of picking up A-Label Express Mail short of entering all 99 individual ZIP Codes from 90001 to 90099 into the USPS website. Your response stated that I could either use the USPS website, call 1-800-ASK-USPS, or ask a retail clerk. (a) Specifically, how would I use the USPS website to determine which of the 99 potential ZIP Codes in the 900 ZIP Code area have A-Label pickup service available (other than entering in each of the potentially 99 individual ZIP Codes one at a time)? (b) You indicate that one could call 1-800-ASK-USPS. When I did this, they indicated that I could send A-Label Express Mail to 90049. However, 90049 is not on the list that you provided in response to DBP/USPS-210 nor is it on the USPS website as being available. Furthermore, when I asked about sending A-Label to Express Mail to Torrance CA 90505, they indicated that I should contact the Torrance post office to determine where A-Label could be sent. What question should I have asked the operator to determine the correct information? (c) How would a local retail window clerk be able to determine which 5-digit ZIP Codes in Los Angeles 900 have the availability of picking up A-Label Express Mail short of entering all 99 individual ZIP Codes from 90001 to 90099 into their POS terminal? (d) Does the Postal Service have any intention of replacing Publication 272 either in hard copy or on the website or both? (e) If not, why not?

The Postal Service objects to this interrogatory on the grounds of relevance. The details sought in these questions, which deal with various matters concerning USPS.com, 1-800-ASK-USPS, and the retail acceptance of A-Label Express Mail, lack the necessary nexus to the ratemaking process.

DBP/USPS-310

This interrogatory reads as follows:

DBP/USPS-310. Please refer to your response to DBP/USPS-304. This interrogatory requested the Postal Service provide insight as to why with respect to provision of retail window service on Saturday, the Pacific Area provides service at approximately one-half that of the central and eastern parts of the country and that the rest of the western part of the country (Southwest and Western Areas) is significantly less than the central and eastern parts of the country. The response made stated that the bases for these

local decisions were not centrally complied. Since the interrogatory related to decisions that were made in primarily one and to some extent a total of three Areas, it would seem appropriate that an inquiry could be made to the proper person in each of these three Areas to provide a more responsive answer to my Interrogatory DBP/USPS-304. Please reanswer the interrogatory

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

This interrogatory, which asks why certain Areas have a lower percentage of offices with Saturday window hours than other Areas, seeks an excessive amount of operational detail that lacks any fundamental relevance to the ratemaking process.

Therefore, the Postal Service objects to the above-referenced interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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