

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268B0001

REPOSITIONABLE NOTES PROVISIONAL SERVICE

Docket No. MC2004-5

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T1-2-5)

The United States Postal Service hereby objects to interrogatories OCA/USPS-T1-2-5, filed on February 13, 2006. These interrogatories seek detailed information comparing the usage of RPNs by customers who participated in pilot testing stages preceding the current provisional service with those customers' usage of the RPN provisional service. The Postal Service has been authorized by counsel for the OCA to state that the OCA does not take issue with this objection and will not move to compel a further response.

First, the data requested are not relevant to the narrow issue of whether the expiration date of the provisional service should be changed, although they could be relevant to a subsequent substantive request. Unfortunately, the data would also be difficult or impossible to collect, since mailings are not uniformly made under mailer's permit numbers, and the earlier tests were designed to detect potential operational problems, rather than to gather other types of data. The Postal Service will, however,

look into the matter further in the context of a subsequent request to see if useful information can be obtained without undue burden.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

Scott L. Reiter

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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