

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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EVOLUTIONARY NETWORK DEVELOPMENT]
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

ANSWER OF DAVID B. POPKIN TO THE MOTION OF THE UNITED STATES POSTAL
SERVICE FOR THE ADOPTION OF PROPOSED PROCEDURAL SCHEDULE AND
SPECIAL RULES OF PRACTICE

March 17, 2006

Respectfully submitted,

N220061PLEADING1

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

1. On February 17, 2006, the Postal Service filed their MOTION OF THE UNITED STATES POSTAL SERVICE FOR THE ADOPTION OF PROPOSED PROCEDURAL SCHEDULE AND SPECIAL RULES OF PRACTICE ["Motion"]. On February 17, 2006, the Commission issued Order No. 1453 ["Order"] allowing participants until today to provide an Answer to the Postal Services Motion.

2. Many of the dates proposed by the Postal Service¹ have been rendered moot by the Commission's Order.

3. To accommodate the proposed schedule, the Postal Service proposed, among other changes, to shorten interrogatory responses from the standard 14 days to seven days. In spite of their offer to respond to interrogatories within seven days, the Postal Service has not lived up to that proposal. Of the 51 non-objected to interrogatories that I have filed more than seven days ago, the Postal Service has responded or not-responded in the following time frame:

Responded to: 22 after 4 days / 12 after 7 days / 4 after 12 days

Not responded to: 9 after nine days² / 3 after 17 days / 1 as of 27 days

¹ Motion at 2

² Number of days shown is through yesterday March 16, 2006.

4. One-third of my interrogatories have not been responded to within the offered time frame. If the Postal Service expects expedition, then they should live up to the deadlines.

5. The Postal Service has requested that the Commission issue its advisory opinion no later than May 5, 2006 to enable the Postal Service to implement the initial wave of operational changes on or about May 15, 2006.³ The Postal Service has been consolidating mail processing facilities for years and years now as well as in recent time without benefit of the Commission's advice. This initial request for this Docket was made by the Postal Service on February 14, 2006. It could have been filed earlier if the Postal Service wanted to.

6. As of yesterday, 23 parties have intervened in this proceeding and they, as well as any other parties that intervene before the deadline, should have a full and complete opportunity to litigate this proposal made by the Postal Service.

7. One of the difficulties in proposing a procedural schedule is that after 30 days of involvement in N2006-1, I still do not have a real solid understanding of what the Postal Service is requesting the Commission to act on.

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 March 17, 2006

³ Motion at 2