

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT WITH
WASHINGTON MUTUAL BANK

Docket No. MC2006-3

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO THE OFFICE OF THE CONSUMER ADVOCATE'S INTERROGATORIES
OCA/USPS-T1-5 (a), (b) and (c)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatory OCA/USPS-T1-5 subparts (a), (b) and (c), which was filed on April 4, 2006.

The interrogatory subparts at issue request that witness Ayub explain his participation in preparing data collection reports involving NSAs with Bank One, Capitol One and Discover, and further request that witness Ayub identify the enumerated requirements in such reports. In this instance, the Postal Service has filed for a baseline Negotiated Service Agreement pursuant to Rule 195. In accordance with such rule, the Postal Service's Request filed on March 29, 2006 is not predicated on any functionally equivalent Negotiated Service Agreement currently in effect and should be reviewed solely on its merits. Accordingly, the Postal Service submits that questions regarding past and pending Negotiated Service Agreements such as Capital One, Bank One, and Discover, are not relevant to, and beyond the scope of, the instant proceeding. Questions by intervenors' counsel regarding other NSA dockets should instead be directed to Postal Service

counsel by correspondence. In sum, the Postal Service respectfully objects to Interrogatories OCA/USPS-T1-5 (a), (b) and (c).

Despite this objection, in the spirit of cooperation and to mitigate litigation cost, the Postal Service intends to provide timely responses to this interrogatory. By responding, however, the Postal Service does not intend to waive its right to object to any follow-up discovery related to its responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 14, 2006

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.

William J. Trumpbour

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April 14, 2006