

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO PITNEY BOWES INTERROGATORIES
(PB/USPS-T1-1 THROUGH 5 AND 9 THROUGH 11)
(April 26, 2006)

The United States Postal Service hereby submits its objections to the following interrogatories of Pitney Bowes, Inc., directed to witness Shah on April 19, 2006:

PB/USPS-T1-1 through 5 and 9 through 11.

Each of these interrogatories seeks information regarding systemwide postal cost data by mail class and rate category. Such data are unrelated to the issues raised by the request in this proceeding, which has been brought under 39 U.S.C. § 3661.

The information requested by these interrogatories, arguably, would be relevant to issues that would arise in an omnibus rate proceeding, which would be initiated by a request brought under 39 U.S.C. § 3622. There is a very strong likelihood that such a proceeding could be initiated in the very, very near future. Accordingly, the Postal Service objects to this attempt by Pitney Bowes to use discovery in Docket No. N2006-1 for the purpose of obtaining information relating to subclass and rate category costing.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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