

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
INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS ASSOCIATION (VP/USPS-T1—3)
(May 3, 2006)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatory VP/USPS-T1—3, filed on April 24, 2006. The interrogatory at issue requests that witness Ayub provide volume statistics for each previously executed NSA (i.e., Docket No. MC2002-2, Capital One Services, Inc.; Docket No. MC2004-3, Bank One Corporation; Docket No. MC2004-4, Discover 4 Financial Services, Inc.; and Docket No. MC2005-2, HSBC North American Holdings, Inc.).

This proceeding is unrelated to previously executed NSAs. The request at issue in this docket has been filed as 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 own merits. Accordingly, the Postal Service submits that volume statistics relating to previously executed NSAs are not relevant to, and beyond the scope of, the instant proceeding.

Questions by the participants' counsel regarding other dockets should instead be directed to the assigned Postal Service counsel by correspondence.

In sum, the Postal Service respectfully objects to Interrogatory VP/USPS-T1—3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 3, 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.

Anthony Alverno

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May 3, 2006