

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
TO INTERROGATORIES OF DAVID B. POPKIN. (DBP/USPS-91, 94)
(June 19, 2006)

The United States Postal Service hereby objects to the following interrogatories of David B. Popkin, filed on June 8, 2006: DBP/USPS-91, 94.

DBP/USPS-91

The question reads:

DBP/USPS-91. Section 313.1b of the Postal Operations Manual [POM] states, "Arrange schedules consistent with requirements of the local community and timely handling of mail at the processing point." Sections 321 through 326 provide detailed requirements for collection boxes. For example, Section 322.231 requires Time Decal Boxes to have two collections Monday through Friday with the last collection at 5 PM or later. [a] May a local post office provide a condition [such as a 4 PM last weekday collection in front of the post office] where compliance of the detailed requirements covered in Sections 321 through 326 is not met by stating that the condition is necessary to meet the general requirements of Section 313.1b?

[b] If so, please discuss the reasons for this action.

[c] Please confirm, or explain if you are unable to confirm, that the requirements of Part 3 of the POM are mandatory at all city delivery offices as noted in Section 311.

[d] Please advise any sections of Part 3 of the POM that are not 100% mandatory due to changes in policy such as Section 322.233 which relates to Sunday collections.

[e] When will Part 3 of the POM be updated to cover any items covered in response to subpart d?

This question does not focus on the rates proposed for any particular class or service.

Instead, it attempts to delve into the minutia of operational policies and manuals. For

example, parts d and e relate to the relationship between an internal manual and current policy. While questions like these may have been explored in service cases, they lack relevance and materiality in the context of an omnibus rate proceeding. In particular, while actual service levels may constitute a relevant issue, compliance with manuals does not.

DBP/USPS-94

The question reads:

With respect to the stamped letter sheets [Disney and Garden Bouquet] that are the subject of Docket C2004-3,
[a] Please advise the number of each of the two items that were printed.
[b] Please advise the cost for each of the two items. Please describe in detail how the cost was calculated and the items that are included in the cost data and their source.

The Postal Service objects to these questions as irrelevant to the issues before the Commission in the instant docket. The information sought is not related to the rates, fees, and classifications proposed here. In fact, a separate docket is pending to address the issue of whether the items mentioned fall within the Commission's jurisdiction. If the Commission asserts jurisdiction, then the information sought could be relevant in a subsequent proceedings to establish classifications and fees for the items. Having not reached that point, however, there is no need for the data sought to be

added to the record in the instant case.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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June 19, 2005