

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-123)  
(July 10, 2006)

The United States Postal Service hereby objects to the following interrogatories of David B. Popkin, filed on June 28, 2006: DBP/USPS-123.

DBP/USPS-123

The interrogatory reads:

DBP/USPS-123 This Interrogatory relates to the scanning that is performed when blue collection boxes and/or post office lobby drops are collected.

[a] Are scans made at all blue collection boxes?

[b] If not, please describe and explain the categories of blue collection boxes that are not scanned.

[c] Are scans made at all post office lobby drops?

[d] If not, please describe and explain the categories of post office lobby drops that are not scanned.

[e] Are scans made of all collections or only those collections that are listed? Please explain.

[f] Please list and discuss any other collection points that are scanned besides blue collection boxes and post office lobby drops.

[g] Please explain and discuss the use that is made of all of the scans that are made.

[h] Please explain and discuss any use of the scans that would allow a determination that a collection box was either not collected or was collected prior to the scheduled time.

[i] Please explain and discuss the action that would be taken.

[j] Is this evaluation of the scan data made at the local level or at the District level, or both?

[k] Is this evaluation of the scan data capable of being made in a manner that would allow for corrective action to be taken such as making a collection from a missed box or an early collected box and getting the mail to the processing plant to meet the service standards that would have

been achieved if the mail had been properly collected.

[l] What is the maximum time caused by the system that it would take for a local supervisor to download and check the scanner that a carrier used for a particular collection route to evaluate for missed or early collections?

[m] Please explain and discuss whether all of the above procedures apply equally to those post offices that are in the EXFC Program as well as those that are not in the program.

This series of questions does not focus on the rates proposed for any particular class or service. Instead, it attempts to delve into the minutia of operational practices regarding scanners used by personnel conducting collections. There is no nexus between the subject matter of this long series of questions, and the relevant and material issues to be addressed in this omnibus rate proceeding. The Postal Service therefore objects on the grounds of relevance and materiality.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 10, 2006

## 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.

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