

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(DBP/USPS-92 THROUGH 94)  
(August 2, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of David Popkin, filed on July 19, 2006: DBP/USPS-92 through 94. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-92** Please refer to the response to Interrogatory DBP/USPS-60.

[a] Please advise why the response to this Interrogatory was filed 13 weeks and 6 days later than required by the Commission's Rules of Practice.

[b] Please confirm, or explain if you are unable to confirm, that had the response to this Interrogatory been timely made, there would have been no restriction on the type of Interrogatories that could have been filed.

[c] Please confirm, or explain if you are unable to confirm, that since the response to the Interrogatory was delayed and not made until after the close of discovery, the only type of Interrogatories that can be made are ones that meet the strict requirements for a follow-up Interrogatory.

**RESPONSE**

(a) The native format file provided in response to the interrogatory to which DBP/USPS-60 followed up was misplaced. Efforts to relocate it, in order to respond to DBP/USPS-60, were constantly interrupted by other equally important and pressing responsibilities, including the numerous other interrogatories filed in this docket.

(b)-(c) These interrogatories call for interpretations of the Commission's Rules of Practice and Procedure and do not request information relevant to the substantive issues in this docket.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-93** Please refer to the response to Interrogatory DBP/USPS-60 subpart a. Please advise if the data file that was provided in the listing of the some 1900+ facilities has any of the items that were requested by me redacted. If so, please provide the specific data that I had originally requested with respect to the 1900+ facilities as opposed to referring me to the response to the APWU Interrogatory.

**RESPONSE**

It does not.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-94** Please refer to the response to Interrogatory DBP/USPS-60 subparts b and d.

[a] Please discuss and explain exactly what the list represents and the types of facilities that are on the list.

[b] Please define the term "end of run".

[c] Does this listing represent a snapshot of what facilities were in operation on March 21, 2006, or does it also include facilities that terminated activity prior to that date?

[d] Please provide a listing of those facilities that were active on March 21, 2006, or at any other date after March 21, 2006.

[e] Please explain and discuss what the term "if it was ever mapped into the end of run system." means in the response to subpart d.

[f] Please confirm, or explain if you are unable to confirm, that Englewood NJ 07631 should not be listed on a current listing of facilities.

**RESPONSE**

- (a) It is a list of facilities thought to contain one or more pieces of automated mail sortation equipment.
- (b) "End of run" is a reference to the completion of a particular use of a piece of automated mail sorting equipment to perform a particular sort scheme or operation.
- (c) There is always the possibility that the list is imperfect, but all of the facilities listed are presumed to have been active on March 21, 2006.
- (d) You have been provided with the former.
- (e) A facility is mapped into the EOR system when it has a piece of automated mail processing equipment that produces EOR reports.
- (f) If a facility is currently operating or presumed to be, it stands to reason that it should be listed on a current listing of facilities.