

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
DAVID B. POPKIN INTERROGATORY TO
THE UNITED STATES POSTAL SERVICE (DBP/USPS-288)
(July 27, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-288, filed by David B. Popkin on July 14, 2006. The interrogatory is reprinted below, and is followed by the bases for this objection:

DBP/USPS-288 This Interrogatory is related to the Premium Forwarding Service [PFS].

[a] Please advise the number of users of the service since the service was established. Please breakdown the time in an appropriate manner to show the changes in users.

[b] Please advise the total number of weekly mailings have been made since the service was established. Please breakdown the time in an appropriate manner to show the changes in use.

[c] Please advise the number of users that signed up for each of the various number of weeks that are authorized for the PFS since the service was established.

[d] Please provide information on the number of weekly mailings that required 2 or more containers to ship a participant's mail.

[e] Please advise the number of weekly mailings that were mailed in a flat-rate envelope?

[f] Please advise the number of weekly mailings that were mailed in a flat-rate box?

[g] Please provide a chart showing the weight in pounds and the zone involved for all of the weekly shipments that were not made in a flat-rate container.

[h] Please discuss any of the suggestions that have been made for improving the service.

[i] Please advise any changes in the PFS regulations that are being considered.

[j] Please advise if there were any reports of fraudulent applications being filed for this service.

This interrogatory inquires about a service that is not part of this omnibus rate case. As such, it cannot be relevant. Moreover, it requests information that appears in the reports the

Postal Service is obliged to file with the Commission as a consequence of the Stipulation and Agreement that served as a foundation for the Commission's recommendation to the Governors, and the Governors' subsequent implementation of the Premium Forwarding Service experiment. As such, the interrogatory is also objectionable as cumulative.

For all of the reasons discussed above, the Postal Service objects to interrogatory DBP/USPS-268.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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