

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 INTERROGATORY OF DAVID B. POPKIN (DBP/USPS-478)
(August 17, 2006)

The United States Postal Service hereby objects to interrogatory
DBP/USPS-478, filed on August 7, 2006. The interrogatory reads as follows:

DBP/USPS-478 Please refer to your response to Interrogatory DBP/USPS-287
subpart d.

[a] Please provide a breakdown for Express Mail that has a service guarantee of three or four days showing the percentage of the mail that is delivered in one calendar day, two calendar days, three calendar days, four calendar days, and five or more calendar days. Provide separate data for PO-PO vs. PO-Addressee mail.

[b] Please confirm, or explain if you are unable to confirm, that most, if not all, of the three and four day delivery guarantees are as a result of the inability to deliver Express Mail on a Sunday or holiday at the delivery office.

[c] Based on the response to subpart b above, please indicate the reasons how three and four day guaranteed mail can be delivered in one or two days.

The Postal Service objects to this interrogatory on the grounds of
relevance. The detailed information sought here with respect to Express Mail
pieces that receive a PTS standard of three or four days is not materially relevant
to the recommendation of Express Mail rates in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Keith Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252, Fax -3084