

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 INTERROGATORIES DBP/USPS-430(a) & (b)

The United States Postal Service hereby objects to interrogatories DBP/USPS-430(a) & (b), filed on August 2, 2006. These questions are irrelevant and are improper follow up.

The interrogatory states:

DBP/USPS-430 Please refer to your response to Interrogatory DBP/USPS-234.

[a] Please confirm, or explain if you are unable to confirm, that DMM Section 163 has six pages which refer to the Rates and Eligibility of Bound Printed Matter and another six pages of DMM Section 173 which refer to the Rates and Eligibility of Media Mail.

[b] Please confirm, or explain if you are unable to confirm, that the similar sections for Express Mail [DMM 113] is 7 pages, Priority Mail [DMM 123] is 4 pages, First-Class Mail [DMM 133] is 5 pages, and Parcel Post [DMM 153] is ten pages.

This interrogatory purports to follow up on the following response:

DBP/USPS-234 Please refer to the response to Interrogatory DBP/USPS-T38-16 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response that confirms, or explains if it is unable to confirm, that a retail customer can make an easily distinguishable choice to use Bound Printed Matter [if the contents of the mailpiece are authorized] over Media Mail or Parcel Post.

RESPONSE:

Not confirmed. It is not likely that a retail clerk and a customer would regard the difference as "easily distinguishable." As pointed out in DBP/USPS-232, twelve

DMM pages set forth the details of the distinction. While questions or discussions concerning the distinction or lack thereof, the relative merits of zoned vs. unzoned pricing, or the effect of differences in subclass cost characteristics on the “easily distinguishable” prices which result may be of interest to postal experts, that sentiment might not be shared by the customers waiting in line while that explanation or discussion is ongoing. See the response to DBP/USPS-227(c)-(e).

This interrogatory made no reference to Express Mail, First-Class, or Priority Mail, so most of part (b) of the instant interrogatory is clearly improper. With respect to Parcel Post, Medial Mail, and Bound Printed Matter, the previous response simply made a reference to one of Popkin’s other questions.¹ The Postal Service did not count, nor has it any reason to count, the number of pages of particular sections of the DMM. Such information is not a material fact in this proceeding. As he has already demonstrated in asking the referenced question, Mr. Popkin can count the pages if he sees fit, and the Commission can take official notice of such things without the need for formal written discovery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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¹ The Postal Service was simply attempting to explain, as Mr. Popkin requested, why it could not conform his assertion that BPM and Media Mail are “easily distinguishable,” a characterization Popkin introduced in his original question in this long series, DBP/USPS-T38-16.