

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-630-632**  
(September 15, 2006)

The Postal Service hereby objects to interrogatories DBP/USPS-630-632 as improper follow up and irrelevant.

**DBP/USPS-630**

Please refer to your response to Interrogatory DBP/USPS-556.

[a] Please advise the significance of the response now that the software has been changed.

[b] Does that mean that the data is available for all 80-some Districts?

[c] If so, please provide data for a representative period.

This question concerns an Inspector General's report, which looked at the application of the balloon rate and parcel surcharges in two postal districts. Mr. Popkin's previous interrogatory asked for "any reasons that you believe that the experiences observed in these two Districts would not be similarly observed country-wide." The Postal Service said that, in response to the report, software changes, as described in the responses to that interrogatory and the subsequent interrogatory, were made. Those national software changes were designed to correct the problems identified in the report.

With respect to part (a), the Postal Service should be required to respond to interrogatories, and then be asked in a purported follow up to “advise the significance of [its] response,” whatever that phrase means. Readers of the report and the answers to Mr. Popkin’s series of interrogatories can judge the “significance” for themselves. It is possible, looking at parts (b) and (c), that there is some misperception that is impeding understanding. There are no references to “data” in this series of interrogatories. Exactly what data Mr. Popkin is referring to is unclear, but it is quite clear that this is a completely new question, and not a true follow-up on the previous answer. Mr Popkin also fails to consider that the study and report are the product of the independent OIG.

#### **DBP/USPS-631**

Please refer to your response to Interrogatory DBP/USPS-557 subpart a.

[a] Please confirm, or explain if you are unable to confirm, that the retail associate must enter the length for all parcels which meet the weight limits shown on lines 1 and 2 of your response.

[b] What is the cut-off value for the length of a parcel that will also require the width and height to be entered and show how the calculation was determined?

#### **DBP/USPS-632**

Please refer to your response to Interrogatory DBP/USPS-559. Please advise the system that will be implemented to implement the dim-weight program as far as what types of parcels will require what types of entries and how those numbers were arrived at.

These interrogatories concern the operational details and particular steps taken by retail associates. However interesting to Mr. Popkin, these details are not relevant to issues before the Commission in this proceeding. Moreover, to the extent he is seeking

detailed operational information about how proposed changes, if recommended and approved, will be implemented, those procedures, as the Postal Service has told Mr. Popkin many times, are under development and will not be finalized until the latter stages of this process.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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