

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
MOTIONS TO COMPEL OF DAVID B. POPKIN (DBP/USPS-151)  
(September 15, 2006)

On July 3, 2006, David B. Popkin filed the following interrogatory:

DBP/USPS-151 [a] Please provide me a listing of the percentage of the retail service windows that are open on Saturday countrywide as well as a separate listing broken out by District.

[b] Please provide me a listing of the percentage of the post office box lobbies that are open on Saturday countrywide as well as a separate listing broken out by District.

[c] Please provide the criteria that are considered for the establishment of Saturday post office lobby hours at a particular facility.

[d] Please provide the criteria that are considered for the establishment of Saturday retail window service hours at a particular facility.

On July 13, 2006, the Postal Service objected to subparts (a) and (b) on the grounds of relevance and burden. Because the request for separate listings broken out by District sought information at a level of operational detail that is irrelevant and immaterial to the issues presented in an omnibus rate proceeding, and because it would take several days of continuous work to produce such disaggregated listings, the Postal Service objected to providing the information. However, the Postal Service did say that it would attempt to provide the percentage of retail service windows and post office box lobbies open on Saturday countrywide.

On July 17, 2006, the Postal Service provided a response to DBP/USPS-151 (a-b), stating that "this" information (referring to the countrywide information the Postal Service checked to see if it could provide) was unavailable.

On July 25, 2006, Mr. Popkin filed a motion to compel a response to DBP/USPS-151, in which he argued that the Postal Service had provided data similar to that requested within DBP/USPS-151; therefore the Postal Service should provide such data

again. On July 26, 2006, Mr. Popkin filed supplemental motion to compel, in which he claimed that a file entitled "po-close.xls" appeared to provide data on Saturday window hours, and by using that document, the Postal Service would be able to respond to DBP/USPS-151(a) "with a greatly limited burden."

On August 2, 2006, the Postal Service stated that it would further investigate filing a response to DBP/USPS-151 based on Mr. Popkin's supplemental motion. Upon further investigation, the Postal Service has concluded that its July 17, 2006 response is still accurate. The "po-close.xls" file shows the latest retail window closing time within a Zip Code on Saturdays. It does not show the number of retail service windows open within each Zip Code on Saturdays. Therefore, the Postal Service cannot use this file to provide a listing of the percentage of retail service windows open on Saturday countrywide. The information provided in the last case is no longer current; the Postal Service is currently in the midst of updating its information regarding the percentage of retail service windows open on Saturday countrywide, but estimates that this updating process will not be finished until sometime next year.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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