

Before THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

STAMPED STATIONERY AND STAMPED CARDS  
CLASSIFICATIONS

Docket No. MC2006-7

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-T1-28-29)

The United States Postal Service hereby objects to interrogatories DBP/USPS-T1-18 and 29, filed by David B. Popkin on April 2, 2007. These interrogatories, reproduced below, seek information that is not “relevant to the subject matter of this proceeding” as required by rule 26 of the Commission’s rules of practice and procedure. Accordingly, the Postal Service is not required to answer them.

The interrogatories read as follows:

DBP/USPS-28

Please refer to your responses to Interrogatory DBP/USPS-2.

[a] Please confirm, or explain if you are unable to confirm, that the surface and Air Mail postal cards that were issued on June 29, 1972 had other images besides the stamp and that they were sold for the face value of the stamp. Please provide images of these cards.

[b] Please advise if there were any other similar issues.

DBP/USPS-29

Please confirm, or explain if you are unable to confirm, that the United States Postal Service has issued Air Letter sheets / Aerogrammes since 1947 and that the more recent issues have had various scenes in addition to the stamp and that these were all sold at the face value of the stamp.

Interrogatory 2, to which question 28 purports to refer, asked for a listing of all PSS and PSC issuances. A complete list was provided that covered the inception of the program in 1994 through the present. Mr. Popkin, based apparently on his own knowledge, and not in reference to interrogatory answer cited, now asks for information about a non-premium postal card issuance dating back to the beginning of postal reorganization. This issuance predates the product which is the subject of this proceeding by 22 years, and also predates the time when a fee was introduced for stamped cards by 25 years, so it is not unlikely that it was sold only for the value of the postage. Whether it was or was not, however, and what images it carried bear no relevance to the issues before the Commission in this docket.

As for question 29, inasmuch as the rates for international mail aerogrammes were set by international treaty, and such aerogrammes were last issued by the Postal Service almost ten years ago, there is no relevance to the instant docket. With respect to both questions, Mr. Popkin apparently has knowledge regarding matters that he would like to have introduced into this proceeding, for some reason known to himself. Indeed, his knowledge of these issuances dating back to 1947, or even 1972 for that matter, may very well be superior to anyone still employed at Postal Headquarters. In any event, if he believes these subjects shed some light on this proceeding, he should have indicated a desire to file testimony to introduce them and explain their relevance to his position. He has indicated to the contrary, that he does not intend to file testimony. It is not appropriate for him to attempt to shift the burden of doing historical research from himself to the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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