

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 DBP/USPS-58-60, 63, and 68
(April 20, 2007)

The United States Postal Service hereby objects to the following interrogatories of David B. Popkin, filed on April 16, 2007: DBP/USPS-58-60, 63, and 68. These interrogatories refer to various previous answers of the witness and ask:

- [a] Does this response represent the personal belief of the witness or the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory?
- [b] If it does not provide the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory, please provide same.

Some of answers referred to in the objectionable interrogatories concerned pricing and other subject areas within the scope of the witness's testimony. In those cases, the witness answered the questions on the basis of her expertise. In the other answers referred to in the objectionable interrogatories, the witness used standard terminology such as "it is my understanding" or "I have been provided with the following information" to indicate that she inquired of knowledgeable individuals to formulate the answer.

Having participated in this and numerous previous dockets before this Commission, Mr. Popkin should understand that witnesses are presented by the Postal

Service to provide testimony and answer questions on its behalf on areas within the scope of their testimony and expertise. No further inquiry is needed to determine that an answer of a witness to an interrogatory within the scope of her testimony is presented as the answer of the Postal Service. Mr. Popkin should also be familiar with the conventional terminology used to indicate that the witness consulted with the appropriate employees to gather information in other areas. No further inquiry is needed to confirm that.

Answers to these questions would not lead to the discovery of admissible evidence. Moreover, the questions' implication that the witness provided her "personal beliefs," rather than either her own expert opinions or information from knowledgeable sources within the Postal Service is inappropriate to these proceedings. For these reasons, the Postal Service objects to the indicated interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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