

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

OPPOSITION TO DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO  
INTERROGATORY DBP/USPS-25 (May 13, 2010)

On April 13, 2010, David B. Popkin submitted the following interrogatory on the  
Postal Service:

**DBP/USPS-25** Please provide a listing of the city delivery post offices that have been granted a waiver of the requirement to have a weekday collection time at the blue collection box in front of the post office and all classified stations and branches of 5 PM or later and/or a Saturday collection time of 1 PM or later. The response should indicate the name and ZIP Code of the post office and the current time of the collection.

On April 23, 2010, the Postal Service objected to this interrogatory in accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure. The Postal Service pointed out that the information sought was irrelevant to the issues raised by the request in this docket, and took the position that compiling the requested information would be overly burdensome.

Mr. Popkin filed a motion to compel a response on May 6, 2010. He argued that the information he requested is relevant because if a post office has been granted a waiver, and has a last collection time before 5:00 p.m., the mitigating effect of a Saturday dispatch on mail that was deposited later on Friday (between the last collection time and 5:00 p.m.) would be lost in a five-day environment.

It bears repeating that this docket concerns a Postal Service national plan to

eliminate or reduce certain operations, including collections from collection boxes along delivery routes on Saturdays. The names of individual post offices and their collection times are immaterial to addressing this national issue.

Moreover, the site-specific data requested by Mr. Popkin are not necessary for him to make his arguments. The Postal Service could provide national cumulative data in response to this question, which would allow the parties to address the potential consequences of moving to 5-day delivery on a nationwide scale. Site specific data add nothing relevant.

Upon further assessment, the Postal Service hereby withdraws its burden objection.

The Commission should deny Mr. Popkin's motion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Pricing and Product Support

Brian Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037; Fax -5492