

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Postal Regulatory Commission
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SIX-DAY TO FIVE-DAY STREET DELIVERY
AND RELATED SERVICE CHANGES

DOCKET NO. N2010-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY
DBP/USPS-33

I move to compel a response to the interrogatory submitted to the United States Postal Service that has been objected to by them.

May 26, 2010

Respectfully submitted,

N20101MTC33

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

On May 3, 2010, I submitted Interrogatory DBP/USPS-33. On May 13, 2010, the Postal Service filed an objection to this interrogatory.

The interrogatory reads as follows:

DBP/USPS-33 Please refer to your response to Interrogatory DBP/USPS-10. For each of the 70-some odd postal districts in the country, please advise the percentage of the facilities that have retail window service on Saturday. Please provide a separate percentage considering main offices only and a second percentage for all facilities including stations and branches.

Please provide the data showing a separate response for each of the Districts.

The Postal Service provided the following partial response:

RESPONSE:

A partial objection was filed to this interrogatory.

From a national standpoint, 86.8 percent of main offices have retail window service on Saturday, and 81.6 percent of all facilities, including stations and branches, have retail window service on Saturday.

The Postal Service's objection to this interrogatory is based solely on the claim that it seeks irrelevant minutiae that will not lead to any information relevant to a resolution of the question raised by the request in this docket.

The existence or non-existence of retail window service on Saturdays will affect the perception that customers will have on the effects of the elimination of street delivery and mail processing on Saturdays and that perception is relevant to this docket.

However the real significance is that the elimination of street delivery service will eliminate the ability of a customer to give their outgoing mail to the carrier on a Saturday and could require the customer to make a trip to their local post office. Furthermore, customers served by a rural delivery carrier would be deprived of the ability to conduct other services such as purchasing stamps or a money order on a Saturday.

Retail window service therefore is a way of mitigating the effects of this proposal on postal customers.

My reason for asking for this data by District is that in a previous docket, if I recall the response, the Western Area only had 44% of their offices with Saturday window hours and Oregon had so few offices outside of the Portland area that there were places where a customer would require an all day trip to transact retail window service on a Saturday.

The requested data is need to show whether there is a significant disparity in Saturday window service throughout the country and if there is such a disparity, it would have an effect on this docket since retail window service on Saturday is a way of mitigating the loss of street delivery service. If this disparity exists, the need for eliminating it should be a part of the Commission's Advisory Opinion.

For the reasons stated, I move to compel response to the referenced interrogatory since it is reasonably calculated to lead to the discovery of admissible evidence.