

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN (DBP/USPS-134)
(July 10, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-134, filed on June 29, 2006. The interrogatory in question reads as follows:

DBP/USPS-134. Please confirm, or explain if you are unable to confirm, that transportation already exists that would allow for the reliable delivery of Post Office-to-Post Office Express Mail to all postal facilities that are currently in the overnight delivery area for First-Class Mail.

The Postal Service objects to this interrogatory on the grounds of relevance. Mr. Popkin is seeking to explore a topic—why the availability of PO-PO Express Mail service is not concomitant with the overnight delivery of First-Class Mail—that is irrelevant to this proceeding.

Therefore, the Postal Service objects to the above-referenced interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Keith Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252, Fax -3084