

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 7/24/2006 5:25 am
Filing ID: 51073
Accepted 7/24/2006

EVOLUTIONARY NETWORK DEVELOPMENT]
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY
DBP/USPS-90

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

July 24, 2006

Respectfully submitted,

N20061MTC4A90

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

On July 5, 2006, I submitted Interrogatory DBP/USPS-90. On July 12, 2006, the Postal Service filed an objection to this interrogatory.

The interrogatory reads as follows:

DBP/USPS-90 Please refer to the USPS Library Reference N2006-1/14 filed on July 3, 2006. Please advise whether, and if so, how, the consolidation will affect the salary level of the Postmaster at Newark.

The Postal Service states that the interrogatory does not raise any relevant issue. The study that was done for the consolidation of the Newark, New Jersey, plant took into account the changes in the staffing changes of the various craft and supervisory [EAS] employees together with the cost effect of the changes.

If the salary level of the Newark Postmaster will change as a result of the consolidation, then this is just as relevant as the changes in craft and supervisory employees. Even if the salary change will not take place so long as the incumbent is in place, the change in salary level is still relevant.

For the reasons stated, I move to compel responses to the referenced interrogatories since they are reasonably calculated to lead to the discovery of admissible evidence.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin July 24, 2006
