

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 7/24/2006 5:32 am  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY  
DBP/USPS-134

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,

R20061MTC5A134

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

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On June 29, 2006, I submitted Interrogatory DBP/USPS-134. On July 10, 2006, the Postal Service filed an objection to this interrogatory on the basis of relevance.

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The interrogatory 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.

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The objective of this Interrogatory is to evaluate and improve the value of service of Post Office-to-Post Office Express Mail. In response to Interrogatory DBP/USPS-127 the Postal Service indicated that this service is only available to certain pick-up points and the Response to Interrogatory DBP/USPS-133 indicated that there are only 7100 facilities to which the type of mail may be sent.

**DBP/USPS-127.**

(a) Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail may only be sent for claiming at a

specifically designated postal facility, either an independent post office or a station or branch of an independent post office.

(b) Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail may never be sent to a facility that is not one of those referenced in subpart a above.

(c) Please confirm, or explain if you are unable to confirm, that a facility to which Post Office-to-Post Office Express Mail may be sent will be able to receive such mail from throughout the entire country.

**RESPONSE:**

(a) - (b) Confirmed that PO-PO Express Mail service is only available to certain destinations.

(c) Confirmed.

**DBP/USPS-133.**

(a) Please advise the total number of postal facilities, either independent post offices or stations or branches, that Post Office-to-Post Office Express Mail may be sent to.

(b) Please advise the total number of postal facilities, either independent post offices or stations or branches, in the country.

**RESPONSE:**

(a) PO-PO Express Mail service is available to 7,100 destinations.

(b) There are approximately 37,142 post offices, stations, and branches.

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I am attempting to show by the response to Interrogatory DBP/USPS-134 that the transportation already exists that would allow this service to be extended nationwide to all the areas where existing transportation is available. This would improve the value of service of Post Office-to-Post Office Express Mail at no added cost and would provide additional revenue. The value of service is relevant.

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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.

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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

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