

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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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-123

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,

R20061MTC6A123

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

On June 28, 2006, I submitted Interrogatory DBP/USPS-123. On July 10, 2006, the Postal Service filed an objection to this interrogatory on the basis of relevance and materiality.

The interrogatory reads as follows:

DBP/USPS-123 This Interrogatory relates to the scanning that is performed when blue collection boxes and/or post office lobby drops are collected.

[a] Are scans made at all blue collection boxes?

[b] If not, please describe and explain the categories of blue collection boxes that are not scanned.

[c] Are scans made at all post office lobby drops?

[d] If not, please describe and explain the categories of post office lobby drops that are not scanned.

[e] Are scans made of all collections or only those collections that are listed? Please explain.

[f] Please list and discuss any other collection points that are scanned besides blue collection boxes and post office lobby drops.

[g] Please explain and discuss the use that is made of all of the scans that are made.

[h] Please explain and discuss any use of the scans that would allow a determination that a collection box was either not collected or was collected prior to the scheduled time.

[i] Please explain and discuss the action that would be taken.

[j] Is this evaluation of the scan data made at the local level or at the District level, or both?

[k] Is this evaluation of the scan data capable of being made in a manner that would allow for corrective action to be taken such as making a collection from a missed box or an early

collected box and getting the mail to the processing plant to meet the service standards that would have been achieved if the mail had been properly collected.

[l] What is the maximum time caused by the system that it would take for a local supervisor to download and check the scanner that a carrier used for a particular collection route to evaluate for missed or early collections?

[m] Please explain and discuss whether all of the above procedures apply equally to those post offices that are in the EXFC Program as well as those that are not in the program.

The Postal Service claims that this Interrogatory does not focus on any particular class of service. It does relate to the collections made at the blue collection boxes and therefore relates primarily to single-piece First-Class Mail and to a lesser extent Priority Mail, Express Mail, and Package Services. The value of these services depends on the proper collections made. The scanning operation was introduced by the Postal Service to improve the reliability of the collection process and to ensure that all mail that is deposited in a collection box will be properly collected so that the mail will be delivered within the established service standards.

Presiding Officer's Ruling No. R2006-1/19 at 4 and 5 stated

The collection box policy descriptions provided in the POM are relevant to the instant proceeding as far as they are an indication of actual Postal Service policy. This could be relevant to the value of service related to the collection of mail. Subparts a through d are reasonably calculated to furthering an understanding of the Postal Service's collection box policy.

Just as the ability to determine what the actual collection policies are, it is equally important to be able to ensure that the collection times that are posted on the collection boxes have been made and the action taken if they are not made.

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
