

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

REPLY IN OPPOSITION OF THE UNITED STATES POSTAL SERVICE TO
THE MOTION TO COMPEL OF DAVID B. POPKIN (DBP/USPS-123)
(July 31, 2006)

On July 10, the Postal Service objected to the following interrogatory of David B. Popkin, filed on June 28, 2006: DBP/USPS-123. Mr. Popkin filed a motion to compel on July 24. The Postal Service hereby opposes that motion.

DBP/USPS-123

The question reads:

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 objects to these questions on the grounds of relevance and materiality. The subjects of these questions are details of operational practices that are not relevant to material issues in this proceeding. Mr. Popkin's motion to compel points to an earlier Presiding Officer's Ruling regarding collection box *policy*, which the Presiding Officer suggested could be relevant to value of service of collection mail.

These questions do not involve collection policy, they involve operational details about scanning practices. Customers, however, are generally oblivious to the existence of scanning, and the details of the exact scanning procedures used by operational personnel in the field therefore play no possible role in customers' view of the overall value of service provided specific mail subclasses. Customers are not concerned with where scans are performed, what use is made of the scan data, or whether scan data are evaluated at the local or District level. Customers do not value "scan" service in and of itself, and there is no practical nexus between the questions about scanning practices posed in these questions, and the issues regarding value of service and relative cost

coverages that must be addressed in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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