

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 8/28/2006 4:55 am  
Filing ID: 52860  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-  
267, 269, 270, 283 through 285, 370, 371, 418, 435 through 446, 479, 488 through 518

I move to compel responses to the interrogatories submitted to the United States Postal Service that have not been responded to by them.

August 28, 2006

Respectfully submitted,

R20061MTC20A267518

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

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I have filed a number of Interrogatories during the period of July 12, 2006, through August 11, 2006, that have not been responded to by the Postal Service within the 14-day time period contemplated by the Commission's Rules of Practice.

Interrogatory Number	Date Filed	Response Was Due
DBP/USPS- 267, 269, and 270	July 12, 2006	July 26, 2006
283 through 285	July 14, 2006	July 28, 2006
370 and 371	July 24, 2006	August 7, 2006
418	July 25, 2006	August 8, 2006
435 through 438	August 2, 2006	August 16, 2006
439 through 446	August 3, 2006	August 17, 2006
479	August 7, 2006	August 21, 2006
488 through 518	August 11, 2006	August 25, 2006

The failure of the Postal Service to promptly respond to discovery has the obvious effect of delaying litigation of the case. Furthermore, I may even be unable to file a follow-up interrogatory due to the procedural schedule.

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For the reasons stated, I move to compel responses to the referenced interrogatories.

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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      August 28, 2006

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