

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
DAVID B. POPKIN INTERROGATORY TO  
THE UNITED STATES POSTAL SERVICE (DBP/USPS-640)  
(October 6, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-640, filed by David B. Popkin on September 26, 2006. The interrogatory is reprinted below, and is followed by the bases for objection:

DBP/USPS-640 Please refer to your response to Interrogatory DBP/USPS-601.

[a] Please confirm, or explain if you are unable to confirm, that there are a number of instances where mailpieces will receive a scan while in transit such as "In Transit" or an "Arrival at Unit" scan.

[b] Please confirm, or explain if you are unable to confirm, that there are instances where these in transit scans are performed on a number of mailpieces at the same time.

[c] Please confirm, or explain if you are unable to confirm, that when these scans are required to be made of a group of mailpieces that the mailpieces will be segregated while the individual scans are made.

[d] Please confirm, or explain if you are unable to confirm, that while this group of mailpieces is individually scanned there may be a delay which will cause that group of mailpieces to miss a scheduled trip and therefore be delayed.

The Postal Service objects to this interrogatory on the bases of irrelevance and untimeliness. To the extent that the information sought is relevant, this question has been asked and answered.

The sequence of questions that led to this interrogatory began with DBP/USPS-289, which was asked and answered as follows:

**DBP/USPS-289** This refers to your response to Interrogatory OCA/USPS-1 in particular the attached letter as it refers to the measurements of performance for retail Priority Mail.

...

[g] Please confirm, or explain if you are unable to confirm, that Delivery Confirmation service may actually slow up the delivery of the mailpiece since it requires that the mailpiece be held out for scanning.

**RESPONSE:**

...

(g) Not confirmed. A mailpiece is not held out for scanning. The carrier provides a scan when the piece is delivered.

Mr. Popkin followed up with DBP/USPS-530, asked and answered as follows:

**DBP/USPS-530** Please refer to your response to Interrogatory DBP/USPS-289 subpart g. Most of the Delivery Confirmation articles that I receive have an "Arrival at Unit" scan which is made at the Post Office Annex before the mail is sent up to the Main Post Office where I have my post office box. My perception is that Delivery Confirmation mail is all scanned with an Arrival at Unit scan and will have to be "held out" in an area and then each of the articles will be scanned and then forwarded on for delivery. Please respond to this scenario.

**RESPONSE:**

DBP/USPS-289, subpart g, asked the Postal Service to "[p]lease confirm, or explain if you are unable to confirm, that Delivery Confirmation service may actually slow up the delivery of the mailpiece since it requires that the mailpiece be held out for scanning." The Postal Service did not confirm this interrogatory because a mailpiece is not held out for scanning. The carrier provides a scan when the piece is delivered. Your perception, as described in this interrogatory, is not correct.

Mr. Popkin then filed DBP/USPS-601, which was asked and answered as follows:

**DBP/USPS-601** Please refer to your response to Interrogatory DBP/USPS-530. I realize that the carrier will provide a scan when the piece is delivered. What I am referring to is when it appears that all mailpieces requiring a scan are scanned "in bulk" with an arrival at unit scan or other in transit scan as the mailpieces are being processed prior to being given to the delivery carrier for ultimate delivery to the addressee

**RESPONSE:**

The Delivery Confirmation Service process does not slow up the delivery of the mail piece.

In the instant interrogatory -- DBP/USPS-640, Mr. Popkin now asks a series of specific questions about scanning procedures, trying, for the fourth time, to get the Postal Service to agree with his proposition that the Delivery Confirmation scanning process can slow the delivery of mail. On three occasions, the Postal Service has stated that it does not. The information sought about scanning procedures is not relevant to any of the issues presented by the participants in this omnibus rate proceeding. Moreover, this question is untimely in requesting such information. Finally, subpart (d), which asks the Postal Service to confirm that mailpieces can miss a scheduled trip because of delivery confirmation, has been asked and answered. There will be no benefit to the record if that Postal Service, for the fourth time, answers that Delivery Confirmation scanning does not slow the delivery of mail.

For all of the reasons discussed above, the Postal Service objects to interrogatory DBP/USPS-640.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.

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