

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
DAVID B. POPKIN INTERROGATORIES  
DBP/USPS-152, and 159-165  
(January 22, 2002)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to follow-up interrogatories of David B Popkin, DBP/USPS-152, filed on January 10, 2002, and DBP/USPS-159-165 filed on January 17, 2002, on the grounds of that said interrogatories are procedurally improper and/or are moot in light of Presiding Officer's Ruling (POR) No. R2001-1/36.

As set out in PORs-27 and -30, the Commission allowed participants to this proceeding to oppose the Postal Service's proposed Stipulation and Settlement Agreement. As of January 16, 2002, only one party—American Postal Workers Union—opposed said agreement, resulting in the issuance of POR -36. By inference, all other parties, including Mr. Popkin, either agree with or do not oppose the Postal Service's Settlement Agreement. Therefore, the Postal Service finds it futile and a waste of limited postal resources to continue to respond to this endless barrage of discovery propounded by Mr. Popkin. Consequently, the Postal Service objects to above captioned interrogatories.

Furthermore, the Postal Service considers interrogatories DBP/USPS-152, 159-161, and 165 as not proper follow-up because the questions raise issues not previously explored. These are new interrogatories for which the discovery period has expired. Consequently, Postal Service objects on the grounds that these interrogatories are untimely.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Joseph K. Moore

### **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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Joseph K. Moore

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