

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORIES VP/USPS-T1-14(a)-(c)
(April 18, 2006)

The United States Postal Service hereby submits its objection to the following interrogatories of Valpak filed on April 11, 2006: VP/USPS-T1-14(a) through (c).

The interrogatories seek confirmation of matters irrelevant to the issues raised by the request in this proceeding.

Subpart (a) of VP/USPS-T1-14 requests confirmation of wording of Commission Rules 54(n)(1) and (n)(2) which, as characterized in the interrogatory, apply to requests for changes in rate and fees. The Postal Service should not be burdened with the task of confirming whether quoted passages from rules inapplicable to current docket say what they say.

Subpart (b) seeks confirmation of the Postal Service's response to these rules in previous omnibus rate dockets. And, subpart (c) seeks a comparison of those omnibus rate case Rule 54(n) responses to information contained in the annual National ZIP Code Directory formerly published by the Postal Service. The Postal Service should not be burdened in the current docket with the production of information that may be relevant to past omnibus rate dockets identified in subpart (b) of VP/USPS-T1-14 or to an omnibus rate docket that is imminent, but that is not relevant to the current docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov
April 18, 2006