

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT WITH
WASHINGTON MUTUAL BANK

Docket No. MC2006-3

**OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1—7-8)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories OCA/USPS-T1—7-8, filed on April 10, 2006. The interrogatories at issue request that witness Ayub respond to detailed questions about the first and second data collection reports involving the Capital One NSA. In particular, the interrogatories request confirmation of revised figures provided in the spreadsheets for the data collection reports.

This proceeding is unrelated to the Capital One filing. The request at issue in this docket has been filed as a baseline Negotiated Service Agreement pursuant to Rule 195. In accordance with such rule, the Postal Service's Request filed on March 29, 2006 is not predicated on any functionally equivalent Negotiated Service Agreement currently in effect and should be reviewed solely on its own merits. Accordingly, the Postal Service submits that questions regarding the data collection reports submitted in connection with the Negotiated

Service Agreement with Capital One are not relevant to, and beyond the scope of, the instant proceeding.

Questions by the participants' counsel regarding the Capital One docket should instead be directed to the assigned Postal Service counsel by correspondence.

In sum, the Postal Service respectfully objects to Interrogatories OCA/USPS-T1—7-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

Anthony F. Alverno
Chief Counsel, Customer Programs

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-3928; Fax -5418
April 20, 2006

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.

Anthony Alverno

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
April 20, 2006