

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN
(DBP/USPS-22)
(May 18, 2006)

The United States Postal Service hereby objects partially to interrogatory DBP/USPS-22, filed by David Popkin on May 8, 2006, on the grounds of its striking similarity to interrogatories to which the Postal Service's previous objections were sustained. Similar questions were asked as DBP/USPS-23 in R2000-1, as DBP/USPS-8 in R2001-1, and as DBP/USPS-20 and 198 in R2005-1. The Postal Service objected to these previous questions because the questions sought detailed information on a level that is irrelevant and immaterial to ratemaking. Although the Postal Service will provide a response to DBP/USPS-22 in this docket, it is concerned that subject matter of this question suffers from the same lack of relevance and materiality acknowledged by the Presiding Officer in previous dockets. While responding to this question, the Postal Service does not concede the relevance or the materiality of this line of inquiry.

For all of the reasons discussed above, the Postal Service objects partially to interrogatories DBP/USPS-22.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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