

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKING  
[DBP/USPS-85]  
(June 15, 2006)

The United States Postal Service hereby objects partially to interrogatory DBP/USPS-85, filed on June 5, 2006, on the grounds of relevance, materiality and commercial sensitivity. The interrogatory states:

DBP/USPS-85            Please advise the compensation, if any, that is provided to droppers, reporters, and return address panel members in both the EXFC and PETE programs.

As Mr. Popkin well knows, EXFC is run by a contractor on behalf of the Postal Service. As part of its role, the contractor must accordingly arrange for individuals to take various roles so that EXFC runs smoothly and generates the results called for by contract. This interrogatory does not inquire into costs that bear on anything relevant or material to any proposed rates, fees or classifications in this docket. The EXFC contractor must necessarily pay its subcontractors (or employees, agents) in return for services rendered; however, the amounts paid to respective "droppers, reporters, and return address panel members" are commercially sensitive to the

EXFC contractor, and of absolutely no significance in this omnibus rate proceeding. The Postal Service accordingly objects to specifying the compensation at which each is paid; beyond that, the Postal Service will respond in full to the interrogatory.

WHEREFORE, the Postal Service objects partially to interrogatory DBP/USPS-85.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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