

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN (DBP/USPS-167)  
(July 13, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-167, filed on July 3, 2006. The interrogatory in question reads as follows:

**DBP/USPS-167.** Please advise all instances that exist, either due to the distances involved and/or the failure to provide the necessary transportation, that will keep the Postal Service from meeting 365-days a year the guaranteed delivery dates that are enumerated in the responses to Interrogatories DBP/USPS-31 and 161 through 165. This does not include articles that are missent or are subject to a delay of an established and scheduled transportation service.

The Postal Service objects to this interrogatory on the grounds of relevance, improper scope, and undue burden. The Postal Service interprets this interrogatory, which is not a model of clarity, as asking for information about Express Mail service to remote post offices (primarily in Alaska), such as those offices that do not receive Express Mail delivery six days per week. Information about such an extremely small number of offices, especially the detailed information sought in this interrogatory, is not materially relevant to this proceeding. In particular, Mr. Popkin's request that the Postal Service provide a listing of "all instances" in which in the remoteness of an office or the lack of six-day-a-week Express Mail delivery may potentially affect the Postal Service's ability to achieve its delivery guarantees (which would presumably require a response

based on specific offices and specific days of the week) seeks a level of operational detail that is well beyond what is material to this proceeding.

In addition, providing a response to this interrogatory would be unduly burdensome, as it would likely require hundreds of work hours on the part of headquarters and field staff. The Postal Service should not be required to dedicate the substantial resources that would be required to answer this question, especially in light of its fundamental lack of relevance to this proceeding.

Therefore, the Postal Service objects to the above-referenced interrogatory on the grounds of relevance, improper scope, and undue burden.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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