

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 8/7/2006 4:57 am  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY  
DBP/USPS-280

I move to compel response to the interrogatory submitted to the United States Postal Service that has been objected to by them.

August 7, 2006

Respectfully submitted,

R20061MTC14A280

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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On July 14, 2006, I submitted Interrogatory DBP/USPS-280. On July 24, 2006, the Postal Service filed an objection to this interrogatory.

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The interrogatory reads as follows:

- DBP/USPS-280                      Please refer to your response to Interrogatory DBP/USPS-135.
- [a]     Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail is an established service.
- [b]     Please explain how there could not be market demand for the addition of additional claim locations.
- [c]     What "harm" would occur if the service was expanded to additional claim locations since the Express Mail transportation system is already in place and it can only serve to increase the volume and revenue.
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The Postal Service objected on the grounds of relevance. While this Interrogatory may have no direct relationship to the rates for PO-PO Express Mail, it certainly relate s to the service levels for that service and therefore to the value of service and then to the mark-up for Express Mail.

The extent to which the Postal Service can improved the service being provided by Express Mail, particularly when it can be accomplished at no cost will only serve to increase the revenue and improve the Postal Service/s position.

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For the reasons stated, I move to compel response to the referenced interrogatory since it is reasonably calculated to lead to the discovery of admissible evidence.

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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.

David B. Popkin      August 7, 2006

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