

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 DOUGLAS CARLSON. (DFC/USPS-35)
(June 29, 2006)

The United States Postal Service hereby objects to the following interrogatory of Douglas Carlson, filed on June 19, 2006: DFC/USPS-35. The question reads:

DFC/USPS-35. Please provide the following information, in a PC-readable format such as a text file or Microsoft Excel file, from the Collection Point Management System database for every collection box in the database: location ID number, box address, description of address, service class, type of box, area of box, posted weekday collection times, posted Saturday collection times, and posted holiday collection times.

The Postal Service objects on the grounds of relevance, materiality, and burden.

This question does not focus on the rates proposed for any particular class or service. Moreover, even to the limited extent that collection service might be considered a relevant factor in pricing, it is only relevant at a national level. Mr. Carlson is seeking a plethora of detailed information on every individual collection box in the country. Information at this level of *operational* detail is patently irrelevant and immaterial to the issues presented in an omnibus *rate* proceeding.

Moreover, the information he seeks does not exist in the format in which he wishes it to be produced. The database in question exists on a mainframe and is maintained by contractors. Converting the data into the format he requests would require a complicated extraction process. The estimated cost of conducting this

exercise is approximately \$7600. It includes the cost of computer processing, mainframe usage, personal computer usage, computer personnel, testing, and project management. The time involved would be in excess of 60 hours. Incurring such an expense would constitute an undue burden. That conclusion applies with even more force when, as in this instance, there is no nexus between this request and the relevant and material issues in this proceeding, as explained above.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX -5402
June 29, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX: -5402
June 29, 2006