

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO OFFICE OF THE  
CONSUMER ADVOCATE INTERROGATORY TO WITNESS MITCHUM  
(OCA/USPS-T40-90)

The United States Postal Service hereby objects to interrogatory OCA/USPS-T40-90, filed by the Office of the Consumer Advocate (OCA) on July 31, 2006. The interrogatory reads as follows:

**OCA/USPS-T40-90.** Please refer to the Postal Service's response to interrogatories OCA/USPS-T40-45, -46, -47, and -48. OCA understands the Postal Service's position that the time period between preshipment notification and the last scan in the DPS operation is "not reliable" based on your views as articulated in response to interrogatories OCA/USPS-T40-23, -25, and -26, as well as the views of others within the Postal Service. Nevertheless, please provide aggregated data on the elapsed time periods between the preshipment notification and last DPS scan for the following types of mail:

- a. First-Class letters, by quarter, from the inception of Confirm to date.
- b. First-Class flats, by quarter, from the inception of Confirm to date.
- c. Standard Mail letters, by quarter, from the inception of Confirm to date.
- d. Standard Mail flats, by quarter, from the inception of Confirm to date.
- e. If data are available only for a lesser number of quarters, or a shorter time period, then please provide the data for such lesser time periods. Specify the quarters used (or other time periods) and the number of scans used to develop the requested time figures.
- f. The Postal Service is free to qualify or repudiate these figures as it believes warranted; but provide them anyway as they may be relevant to pricing criteria that the Commission must apply in the instant rate case.

The Postal Service objects to this interrogatory because of a lack of relevance to this proceeding. As the Postal Service has stated in response to interrogatories

OCA/USPS-T40-23, 25, and 26, and as the OCA itself submits in the instant interrogatory, data on the time period between preshipment notification and the last scan in the DPS operation is not reliable. Responding to this interrogatory would only provide unreliable data, and the Postal Service fails to see how unreliable data of this sort would be relevant to any issues raised in this rate case. Though the OCA may have a valid interest in this information outside this docket, providing this unreliable data here would serve only to confuse parties who might mistakenly rely upon it. Therefore, the Postal Service objects to this interrogatory on the grounds of relevance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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