

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DOUGLAS CARLSON. (DFC/USPS-76(b))
(August 31, 2006)

The United States Postal Service hereby objects to the following interrogatory of Douglas Carlson, filed on August 21, 2006: DFC/USPS-76.b. The whole question reads:

DFC/USPS-76. Please refer to the response to DFC/USPS-35.

- a. Please provide all data requested in DFC/USPS-35, including the area of the box. This field may be known in the CPMS as the "location type code."
- b. Please provide the SQL query used to extract the data requested in this interrogatory.

The Postal Service does not object to part (a) of the question, as the Postal Service understands it. Question 35 included a request for "area of box." That was a data field in the previous database, CBMS, but it is not a data field in the current database, CPMS. The IT personnel doing the extraction noted the absence of "area of box" and submitted an email inquiry to subject-matter personnel at Headquarters as to how to proceed. Those Headquarters personnel were, however, out of the office; therefore, to complete the extraction in accordance with the deadline set by the Presiding Officer, the IT personnel had to proceed without the requested feedback. By the time the necessary Headquarters personnel received the inquiry, Mr. Carlson had already filed

this follow-up. As he suggests, the most closely corresponding field in CPMS is “location type.” If he had included that information in his original request, a substantial amount of time and effort that essentially duplicated the original effort would have been avoided.

To respond to part (a), the Postal Service will replicate the extraction process, now including an additional column for “location type.” It bears noting that, since CPMS is a live production database, the new output files will reflect extraction at a different point in time and will accordingly not constitute an exact match to the information previously provided to the extent that there have been changes to any data elements since the first extraction was run. In any event, to the extent that part (a) intends simply to elicit information that is similar to that previously provided, the Postal Service will respond.

The Postal Service, however, does object to part (b) of the interrogatory DFC/USPS-76. This part of the question seeks to require the Postal Service to provide a copy of the SQL (Structured Query Language) code used to extract the information requested by Mr. Carlson from the CPMS database. The Postal Service objects on the grounds of relevance and privilege.

Question 35 asked for individual data elements for every collection box in the country. The Postal Service has provided that information to Mr. Carlson. To the extent that part (b) of the new question conceivably relates to the situation directly addressed in part (a) (the deletion of “area of box” and addition of “location type”), as indicated above, that situation is being resolved directly by rerunning the extraction process with the new data field added. Particularly given that Mr. Carlson has been or will be

provided all of the information requested, the technical details by which the Postal Service has responded to his request are not relevant. Those details are clearly well-removed from the substantive data elements that Mr. Carlson has obtained, and would shed no light on any question of relevance to the ratemaking process.

Moreover, the Postal Service has a proprietary interest in its intellectual property, and CPMS constitutes part of that intellectual property. Substantial postal resources were devoted to the development of the CPMS platform. The value of the inherent intellectual property rights could well be compromised by public disclosure of technical details relating to the structure and processes of the CPMS. A response to part (b) of the instant question would necessarily require revelation of some portion of those technical details. It would also reveal programming relating to the SQL itself, which also constitutes valuable intellectual property. Release of such information would not be consistent with good business practice, in an era in which intellectual property challenges can emerge from unforeseen sources. Therefore, not only would a response to part (b) of DFC/USPS-76 not be relevant to any material issues, but it would also needlessly implicate intellectual property rights.

The Postal Service objects to DFC/USPS-76(b) on the grounds of relevance and privilege.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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August 31, 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.

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