

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

RATE AND SERVICE CHANGES TO IMPLEMENT  
BASELINE NEGOTIATED SERVICE AGREEMENT  
WITH BANK OF AMERICA CORPORATION

Docket No. MC2007-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY APWU/USPS-ST3-3(D)**  
(May 21, 2007)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service objects to interrogatory APWU/USPS-ST3-3(d), directed to witness Raney and filed on May 9, 2007. The Postal Service objects to this interrogatory on the grounds that the information requested is irrelevant and is commercially sensitive and proprietary.

APWU/USPS-ST3-3(d) states: "Please provide a recent copy of a "Sort Plan Area Summary" End-of-Run report for a comparable length of time as described on page 2 of LR-K-68. The location and identification of the plant can be redacted but please label and define all the items that show on that report and explain how you would use it to calculate the percentage of mail finalized."

**Relevance.** Such a report is not relevant to the issues in this proceeding. The APWU interrogatory appears to request a single report from a single facility at a single point in time. The NSA at issue in this case uses baseline values based on systemwide average data to measure improvements in the performance of Bank of America's mail and will collect specific performance data on Bank of America's mail. A single report

from a single facility at a single point in time is certainly not representative of either a baseline number based on averages or any numbers or measurements derived from a specific customer's mail. Any one of a number of factors could influence a single facility's machine's End-of-Run data. The participants and the Commission thus cannot draw conclusions from the data contained in such a report. Hence, any such report would be of no relevance in this docket.

**Commercial sensitivity.** The requested report -- or for that matter, any End-of-Run report -- contains commercially sensitive and proprietary information. End-of-Run reports contain machine throughput information, including pieces run on automated equipment, pieces rejected on automated equipment, and pieces rejected for particular reasons. Such data are used to derive budgets, projections of workhours, overtime and other labor-sensitive information. If publicly revealed, postal management could be severely disadvantaged in any labor disputes or negotiations.

End-of-Run reports, in addition to the information listed above, also contain sort scheme and other operation-specific information. If any of this information were made public, the Postal Service also could be put at a competitive disadvantage. Such information concerning volumes run in particular operations on particular machines using particular sort schemes, as well as that showing machine performance, could be of value to competitors (including upstream competitors of the Postal Service) in attempting to draw business away from the Postal Service. Postal Service competitors do not make such specific details of their operations widely known and hence it would not be good business practice for such information to be disclosed publicly in the course of this docket.

For the above stated reasons, the Postal Service respectfully objects to interrogatory APWU/USPS-ST3-3(d).

UNITED STATES POSTAL SERVICE

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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.

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