

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES DFC/USPS-T39-23 (A-G, I), 26(B), AND 27
OF DOUGLAS F. CARLSON
(February 15, 2000)

The United States Postal Service hereby objects to interrogatories DFC/USPS-T39-23 (a-g, i), 26(b), and 27, filed by Douglas F. Carlson on February 7, 2000, and directed to witness Mayo.

The Postal Service objects to interrogatory DFC/USPS-T39-23, parts a-g, and part i, because they lack relevance to this proceeding, and ask for confidential mailer-specific information. These interrogatory parts ask about ZIP Code and city name assignment, both generally and with regard to a specific mailer. The Postal Service will answer the thrust of the interrogatory, but believes that any mailer-specific information is irrelevant and inappropriate. In particular, in responding to the interrogatory in part, witness Mayo will explain that the assignment of unique ZIP Codes to particular mailers, and city name assignment for such ZIP Codes, are postal operational matters, and are not part of caller or post office box service. Such matters therefore are not relevant to issues in this proceeding. Moreover, Postal Service procedures do not provide for customers creating their own city name for a particular ZIP Code. Since classifications and fees are based on general procedures and services, details about any particular mailer are unnecessary.

The Postal Service generally does not make mailer-specific information public, and objects to doing so, especially when the relationship to issues in this proceeding is

missing. Mailer-specific address information is especially sensitive, given statutory restrictions on the Postal Service's ability to provide "any mailing or other list of names or addresses (past or present) of postal patrons or other persons." 39 U.S.C. § 412.¹

The Postal Service objects to interrogatory DFC/USPS-T39-26(b) because it lacks relevance and materiality to any issue in this proceeding. This interrogatory asks for the procedures for a post office box customer who does not receive mail at his post office box on holidays despite contrary Postal Service policy. As the Postal Service will explain in responding to the other parts of this interrogatory, holiday delivery to post office boxes may be done for operational reasons, but is not generally part of the post office box service offer to customers. Any conflict between Postal Service policy and what Mr. Carlson believes appropriate could be discussed with local postal officials or with the Postal Service's Consumer Advocate. However, the procedures for addressing such a conflict are not a proper matter for an omnibus rate proceeding.

The Postal Service objects to interrogatory DFC/USPS-T39-27 on grounds of relevance, materiality, and burden. That interrogatory asks witness Mayo about the shape of the flaps on the Postal Service's stamped envelopes and on private envelopes, the ease of typing addresses on envelopes with V-shaped flaps versus rounded flaps, an explanation why stamped envelopes do not have rounded flaps, and any advantages of V-shaped flaps compared to rounded flaps. These questions concern envelope design issues that have no impact on the pricing for stamped envelopes. No witness is familiar with these design issues, so it would be expected to take an hour or two to identify someone who can educate a witness about these issues, and obtain information to answer the questions. Such a burden is undue given the lack

^{1/} Mr. Carlson's suggestion in part (a) of the interrogatory that the Postal Service can substitute "a remittance processor" or "a customer" for Citibank in responding does not help, given that the question has already identified Citibank.

of relevance and materiality of the information to the rate and fee proposals in this proceeding.

In the last omnibus rate case, the Presiding Officer stated that:

Rate proceedings are not a forum for general oversight of Postal Service operating practices. While the quality of service received by mailers is relevant, argument about the wisdom of particular operating procedures that may have an impact on service is not a fertile area.

Presiding Officer's Ruling No. R97-1/21, at 4. The Postal Service objects to interrogatory DFC/USPS-T39-27 because it appears to be directed at supporting argument on the wisdom of the Postal Service's design of stamped envelopes. Likewise, the Postal Service objects to interrogatories DFC/USPS-T39-23 and 26 to the extent they focus on postal operating procedures rather than proper issues for an omnibus rate proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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February 15, 2000

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 H. Rubin

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