

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
INTERROGATORY DFC/USPS-T39-36(B-D)
OF DOUGLAS F. CARLSON
(February 28, 2000)

The United States Postal Service hereby objects to interrogatory DFC/USPS-T39-36(b-d), filed by Douglas F. Carlson on February 17, 2000, and directed to witness Mayo, on the grounds of relevance, materiality, and burden.

Interrogatory DFC/USPS-T39-36 follows up on the response to interrogatory DFC/USPS-T39-10. In that response, witness Mayo stated that she "would not be surprised if post office box delivery did not occur or access to post office boxes was not available on Saturdays as a result of unique local circumstances." Interrogatory DFC/USPS-T39-36(a) asks for the national policy or other guidelines that explain the "unique local circumstances" under which no delivery or access to post-office boxes is permissible." Witness Mayo will respond that she knows of no such national policy or guidelines. Part b asks witness Mayo to "enhance the record on this subject by examples" by explaining "why customers may not receive mail and access their post office boxes on Saturdays at the Byron Rumford Station in Oakland, California, the post office in Babb, Montana, and the station located in the Port Authority Bus Terminal in New York, New York." Part c asks the approximate year in which the building housing the Byron Rumford Station was constructed, and part d asks for confirmation that access to the box section on Saturdays at the Byron Rumford Station could not have been accommodated architecturally.

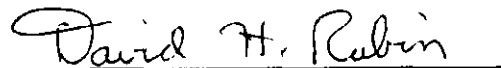
These detailed operational questions lack relevance to any issue in this proceeding. Witness Mayo has already explained, in response to interrogatory DFC/USPS-T39-13, that "Saturday non-delivery or non-access to post office boxes is not enough of a factor to consider an alternative [post office box] fee structure", given the required averaging needed to meet the statutory concern for fee simplicity. Even if such non-access or non-delivery were an important factor for pricing, the details of particular facilities, and the operational reasons for non-access or non-delivery, are not needed. Presiding Officer's Ruling No. R97-1/53 concluded that, while details of a service may be relevant to its value, "operational details of a service are beyond the scope of material issues in a rate proceeding." R97-1/53 at 5. These questions about particular facilities ask details which are not known by any witness, and the burden of obtaining such information is not justified by any need in this proceeding. Moreover, it appears from the questions that Mr. Carlson may know more about these facilities than the Postal Service's rate case team, so that such operational matters, if relevant, might be more suited to Mr. Carlson's testimony than discovery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

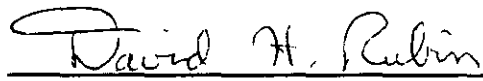


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
February 28, 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.

A handwritten signature in cursive script that reads "David H. Rubin". The signature is written in black ink and is positioned above a horizontal line.

David H. Rubin

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Washington, D.C. 20260-1137
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