

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

OPPOSITION OF UNITED STATES POSTAL SERVICE
TO CARLSON MOTION TO COMPEL RESPONSE TO
INTERROGATORY DFC/USPS-53
(April 10, 2000)

The United States Postal Service hereby files its opposition to the motion of Douglas F. Carlson to compel a response to interrogatory DFC/USPS-53. This interrogatory requests identification of specific ZIP-Code pairs generally referred to in the response to DFC/USPS-T34-13. The response stated:

I am informed that there are 649,106 valid 3-digit ZIP Code pairs. (1) There are currently 49 ZIP Code pairs where First-Class Mail provides overnight service, while Priority Mail provides two-day service. These cases appear to be data-base errors and are being resolved. (2) There are currently 151 ZIP Code pairs where Priority Mail provides overnight service, while First-Class Mail provides two-day service.

The Postal Service objected to providing the ZIP Code pairs in question on the ground that the identity of the requested pairs, while of interest to Mr. Carlson (and undoubtedly of others, including the Postal Service's competitors), is nonetheless far removed from the costing and pricing matters at issue in this proceeding, and is irrelevant. The Postal Service also objected to providing this information on the grounds that the information associated with data base errors, while in the process of being corrected, could be used by competitors to harm the commercial interests of the Postal Service.

The Postal Service stands by its objections. It should be noted at the outset that the errors referenced in part (1) of the Postal Service's response have been corrected (See Response of United States Postal Service to Presiding Officer's Information

Request No. 6, question 10(b)), and there is no longer any arguable vitality to Mr. Carlson's continued quest for this information. Furthermore, any provision of these ZIP Code pairs would serve no purpose other than to risk potential commercial harm to the Postal Service.

The remaining 151 ZIP Code pairs referenced in part (2) of the response are also plainly irrelevant to the matters at issue in this proceeding. Rates for both Priority Mail and First-Class Mail are set nationally, not in relation to ZIP Code pairs. Mr. Carlson's speculations regarding whether the 151 ZIP Code pairs "generally represent major metropolitan areas," do not alter this fundamental fact.

Finally, Mr. Carlson, in his motion, provides yet another, even more compelling reason why the Postal Service should not be ordered to do his bidding. In the very act of moving to compel provision of the requested information, Mr. Carlson claims that the Postal Service *already has provided him* with a file wherewith "a person can determine these ZIP Code pairs." If this claim is true, then Mr. Carlson, by his own admission, already has what he seeks, and need not bother the Postal Service and the Commission with additional, duplicative, and cumulative requests.

The motion to compel should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

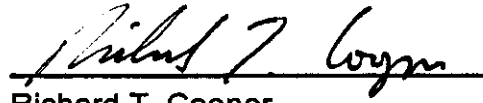
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April 10, 2000

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.


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