

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON  
COMMENTS IN RESPONSE TO OPPOSITION OF  
UNITED STATES POSTAL SERVICE  
TO CARLSON MOTION TO COMPEL RESPONSE  
TO INTERROGATORY DFC/USPS-53

April 14, 2000

On March 31, 2000, I filed a motion to compel the Postal Service to respond to DFC/USPS-53, which requests the 151 ZIP Code pairs for which Priority Mail provides overnight service while First-Class Mail provides two-day service.<sup>1</sup> In my motion, I argued that the data the Postal Service is withholding already are in the public domain because "the Postal Service has provided me, and presumably other customers, a data file containing the same information."<sup>2</sup> In its opposition filed three days late on April 10, 2000,<sup>3</sup> the Postal Service seizes upon this comment and claims that I already have the information that I seek; therefore, the Postal Service should not have to provide it. Six clarifications are necessary.

First, I have received no data since 1998. Therefore, my data are not current.

Second, I am not certain whether I would be able to obtain an updated copy of the data file from the Postal Service, particularly in light of the Postal Service's present objection to providing a tiny portion of the large data file.

Third, I am not certain that I would be able to analyze the data to identify the 151 ZIP Code pairs in question because the data file is quite large and cumbersome. My

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<sup>1</sup> Douglas F. Carlson Motion to Compel the United States Postal Service to Respond to Interrogatory DFC/USPS-53 (filed March 31, 2000).

<sup>2</sup> *Id.* at 3.

<sup>3</sup> Opposition of United States Postal Service to Carlson Motion to Compel Response to Interrogatory DFC/USPS-53 (filed April 10, 2000).

initial effort to manipulate the file just to provide origin-destination service standards was frustrating, and the result of my efforts was not particularly user-friendly or useful.

Fourth, the Service Standards CD-ROM that the Postal Service currently distributes has a data file associated with it. While I do not have the technical skills to use this data file, I suspect that a skilled computer technician would be able to access and analyze it. Therefore, while the information is in the public domain, I do not necessarily have access to it. The presiding officer should recognize that individual participants may not have the technical resources necessary to perform computer analyses of data.

Fifth, I believe that the Postal Service either has already identified the 151 data pairs or could easily modify the computer program used in the initial analysis to identify and report the precise 151 data pairs. The Postal Service now appears simply to be withholding information that could be produced with minimal burden.

Sixth, even if I did have the information, the information would not be in the record. I should not be required to submit testimony in order to introduce Postal Service data into the record.

The record — for the benefit of all participants — will be enhanced if the Postal Service is directed to respond to DFC/USPS-53.

Respectfully submitted,

Dated: April 14, 2000

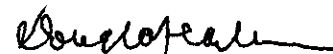


DOUGLAS F. CARLSON

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### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

April 14, 2000  
Emeryville, California

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