

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO DOUGLAS F.  
CARLSON INTERROGATORIES TO WITNESS KINGSLEY  
(DFC/USPS-T10-28 - 30 and 32)  
(April 20, 2000)

The United States Postal Service hereby objects to Douglas F. Carlson interrogatories DFC/USPS-T10-28 - 30 and 32, directed to witness Kingsley, filed on April 10, 2000. The interrogatories request information that is irrelevant and, in some instances, would be unduly burdensome to obtain.

Questions 28 and 29 are follow-up to OCA/USPS-T10-2(b). The OCA question inquired about the effects of volume fluctuations (daily, weekly, monthly) on staffing and complement planning. In her response to subpart (b), as requested, witness Kingsley provided information about Advanced Facer Canceler System (AFCS) processing at several specific facilities by day of week. Mr. Carlson now follows up with question 28, which requests volume and date information about Sunday processing at the specific facilities included in the response to the OCA question, and with question 29, which inquires about the extent to which similar information is available for every P&DC and P&DF in the country.

It is abundantly obvious that these questions in no sense follow up on the substance of the original answer, and instead represent yet another foray by Mr. Carlson into the issue of the regularity of Sunday processing of collection mail. Mr. Carlson first broached this topic in his first set to the Postal Service, questions 1-12,

and he subsequently returned to it in questions 38-45 to the Postal Service. In denying Mr. Carlson's motion to compel certain of those interrogatories, however, the Presiding Officer made clear his determination that further exploration of issues of this type is unnecessary. With respect to Sunday processing, the Presiding Officer found that "the scope of the national policy is clear, as well as the nature of possible qualifications, limitations, and conditions," and that "it seems unnecessary to pursue differences over the meaning of 'regular processing' at this point." Presiding Officer's Ruling No. R2000-1/33 (April 10, 2000) at 4. He also indicated that any benefit of facility-by-facility analysis would not justify the burden entailed. *Id.* at 4-5. The same conclusions apply here, and the Postal Service objects to questions 28 and 29 on that basis, as well as on the grounds that they are inappropriate follow-up. (To avoid any possible misimpression to the contrary, the Postal Service notes that the Presiding Officer's Ruling would not have yet been available to Mr. Carlson at the time he prepared the instant interrogatories to witness Kingsley, as the two documents were docketed on the same day and would have crossed in the mail, so to speak.)

DFC/USPS-T10-30 states:

Please provide the number of postal facilities that use the ES-3 bar-coding platform.

DFC/USPS-T10-32 states:

Are the ES-3 bar-coding platforms used only in offices that do not have RBCS? If the answer is no, please explain.

The requested information is irrelevant. The ES-3 bar-coding platform is a stand-alone machine that applies barcodes. It was not even mentioned in witness Kingsley's testimony. It is not a part of any nationally-supported automation program, but rather is

supported at the local level. Operational personnel at Headquarters do not know exactly how many such machines exist, but conclude that the number is small. Even though the number of such machines is small, obtaining the information requested would be unduly burdensome. Because the machine is deployed at the local level and not tracked nationally, each area would have to be contacted and each area would then have to contact any number of facilities within its jurisdiction to determine (1) whether they even had the ES-3 bar-coding platform and (2) whether they were using it. To fully respond to number 32, those facilities using the ES-3 bar-coding platform would then have to be checked to confirm whether they had RBCS. These efforts are not warranted given the insignificant part, if any, that the ES-3 bar-coding platform plays in postal operations.

For the foregoing reasons, the Postal Service should not be required to respond to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Susan M. Duchek

**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.



Susan M. Duchek

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