

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

RECEIVED
May 1 4 53 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

POSTAL RATE AND FEE CHANGES, 2000

**UNITED STATES POSTAL SERVICE
MOTION TO LIMIT SCOPE OF RESPONSE TO PRESIDING OFFICER'S
RULING NO. 9 QUESTION 6**

On April 21, Presiding Officer's Information Request (POIR) No. 9 directed to the Postal Service was issued. POIR No. 9 poses eight questions, to which responses must be filed by May 1. Question 6 of POIR No. 9 states as follows:

6. The 1999 Annual Report of Investigations of the United States Postal Inspection Service cites 'improper conversion rate applications (the factors used to ascertain mail volume)' as one of five areas requiring continued postal management attention. The citation is based on the results of a summary of 16 reports issued by the Service on March 30, 1999. Please provide copies of this summary report and all individual reports that involve the conversion rate issue.

The Postal Service has identified the Inspection Service reports responsive to this request. These include 16 reports, in addition to a summary report and a supplement to the summary report. These documents total approximately 250 to 350 pages, and consist of Observations of Mail Conditions (OMC) reports at specific postal installations throughout the United States. The contents of the reports contain commercially sensitive and facility-specific information, including, *inter alia*:

- Site-specific mail handling procedures;
- Site-specific handling of customer-specific mailings;

- Site-specific dropship appointment schedules, which give indications of steady customer traffic at specific installations;
- Site- and mailer-specific volumes of specific types of pieces;
- Dropship mailer-specific behavior;
- Site-specific peak-period hiring patterns;
- Airline-specific performance evaluations at airport hubs;
- BMC-specific maximum number of daily scheduled appointments for mail acceptance; and
- Site-specific Express Mail delivery statistics on specific dates.

Only a small portion of the reports appears to relate to the subject matter of the POIR No. 9 Question 6, *i.e.*, conversion rate applications. Redacting facility-, customer-, and contractor-specific information, as well as other types of commercially sensitive information, from all sections of the eighteen reports would consume a considerable number of person hours. In lieu of requesting the Presiding Officer for permission to redact mailer-, contractor-, and facility-specific information from the entirety of each report, the Postal Service requests that the Presiding Officer permit the Postal Service to file only those portions of the reports specifically addressing the conversion rate issue, with any customer-, facility-, or contractor-specific names redacted.¹ This measure would not only limit the redaction exercise, but also avert the need for the Postal Service to

¹ It is believed that, for those sections of the reports dealing with conversion rate issue, there would be few, if any, redactions of customer- or contractor-specific information.

request that the reports be filed under protective conditions to protect commercially sensitive information.

The Postal Service is undertaking to prepare the reports for filing in this manner, and intends to have them ready for filing by Friday, May 5, if not sooner. Since the redactions cannot be timely completed before today's due date, the Postal Service also requests leave to file the response to POIR No. 9 Question 6 out of time.

WHEREFORE, the Postal Service requests that the Presiding Officer issue a ruling limiting the response to POIR No. 9 Question 6 to the portion of the reports addressing the subject matter of the question and permitting the Postal Service to file the reports on or before May 5 with redactions as specified above.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

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.


Anthony Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
May 1, 2000