

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1
POSTAL RATE COMMISSION
THE SECRETARY

DOUGLAS F. CARLSON
MOTION TO COMPEL THE UNITED STATES POSTAL SERVICE
TO RESPOND TO INTERROGATORY DFC/USPS-93

May 13, 2000

I move to compel the Postal Service to respond to interrogatory DFC/USPS-93, which I filed on May 2, 2000. This interrogatory reads:

DFC/USPS-93. The Service Standards CD-ROM contains several instances where First-Class Mail provides two-day delivery to the SCF associated with a particular destination city, yet mail to the destination city itself has a three-day delivery standard. For example, First-Class Mail from Bangor ME (046) to SCF Paterson NJ (074), SCF Newark NJ (070), and SCF New Brunswick NJ (088) receives two-day delivery, while First-Class Mail from Bangor to the city of Paterson (075), the city of New Brunswick (089), and the cities of Newark (071), Elizabeth (072), and Jersey City (073) receives three-day delivery. Do these examples represent database errors? Please explain.

On May 12, 2000, the Postal Service filed an objection, claiming that the information is irrelevant, immaterial, and trivial.¹

The Postal Service's objection is frivolous. Service standards are relevant to determining the value of First-Class Mail and Priority Mail. Moreover, the presiding officer ruled in POR R97-1/89 that the "reliability or accuracy of relevant data is nearly always relevant."² This interrogatory is proper.

Participants have plenty of reason to doubt the accuracy of service-standard data. My interrogatories DFC/USPS-53 and DFC/USPS-T34-13 inquired into the service standards for First-Class Mail and Priority Mail. The information provided in response varied for quite some time as database errors were discovered and resolved. In preparing my initial brief, I am conducting a detailed analysis of service standards for

¹ Objection of the United States Postal Service to Carlson Interrogatory DFC/USPS-93 (filed May 12, 2000).

² POR R97-1/89 at 3 (filed January 27, 1998).

First-Class Mail and Priority Mail and the Postal Service's representations to customers of the service standards. The data that are the subject of DFC/USPS-93 appear to be database errors, and I am simply attempting to determine whether the data are accurate or erroneous.³

The Service Standards CD-ROM is, itself, one method by which the Postal Service represents service standards to mailers. If the information on the CD-ROM is inaccurate, as the information the Postal Service provides to customers via retail terminals clearly is,⁴ the Commission will have yet another example of the Postal Service providing misleading information to mailers on service standards. In the instant case, customers might use Priority Mail instead of First-Class Mail under the mistaken impression that First-Class Mail from Bangor to Paterson receives three-day service.

My interrogatory requests confirmation of the accuracy of relevant data and examines the accuracy of information on service standards that the Postal Service provides to mailers. Therefore, the Postal Service should respond to DFC/USPS-93.

Respectfully submitted,



DOUGLAS F. CARLSON

Dated: May 13, 2000

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

May 13, 2000
Santa Cruz, California

³ The database is providing information that would be as odd as having a two-day service standard for First-Class Mail from New York City to SCF Northern Virginia (cities such as Vienna and Fairfax) but a three-day service standard from New York City to Arlington. The Northern Virginia P&DC serves all these cities, and if different service standards existed, one might expect Arlington to have the two-day standard while the SCF would have the three-day standard — not the other way around.

⁴ Response of Postal Service Witness Robinson to Questions Posed at Hearing at 5 (question posed at Tr. 7/2897) (filed April 26, 2000).