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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

COMPELLED RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
DOUGLAS F. CARLSON
(DFC/USPS-72)

The United States Postal Service hereby provides its response to the following interrogatory of Douglas F. Carlson: DFC/USPS-72, in compliance with Presiding Officer's Ruling No. R2000-1/61 (May 15, 2000).

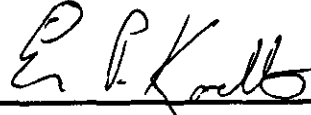
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 19, 2000

**COMPELLED RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON**

DFC/USPS-72. Please provide all policies that explain and govern the Postal Service's obligation, if any, to provide every American mail delivery six days per week.

RESPONSE:

There do not appear to be any policies that oblige the Postal Service "to provide every American mail delivery six days per week." To reach this result, a policy would both have to specify "delivery six days per week," and have to explicitly apply to "every American." The Postal Reorganization Act does direct the Postal Service to provide "prompt, reliable, and efficient services to patrons in all areas and ... render postal services to all communities," and calls for "a maximum degree of effective and regular postal service to rural areas, communities and small towns where post offices are not sustaining." 39 U.S.C. § 101(a-b). The Act also requires the Postal Service to "receive, transmit, and deliver [mail] throughout the United States, its territories and possessions" and makes the Postal Service responsible for maintaining "an efficient system of collection, sorting and delivery of mail nationwide." 39 U.S.C. § 403(a-b). The Act states that the Postal Service "shall serve as nearly as practicable the entire population of the United States," and shall "establish and maintain postal facilities of such character and in such locations that postal patrons throughout the Nation will, consistent with reasonable economies of postal operations, have ready access to essential postal services." *Id.* None of these provisions (nor any others of the Act), however, specify the frequency with which mail must be delivered.

On the other hand, in response to concerns arising in the early 1980s that the Postal Service might (either actually or hypothetically) deviate from its long-standing

general practice of six-day a week delivery, Congress has routinely included a provision in annual postal appropriation bills that requires that "6-day delivery and rural delivery of mail shall continue at not less than the 1983 level." Such a provision is included in the Postal Service Appropriations Act, 2000. 145 Cong.Rec. H8205 (daily ed. Sept. 14, 1999). While this provision might restrict the Postal Service's ability to reduce delivery frequency to less than six days per week for those types of customers who received such service in 1983, its plain language creates no obligations beyond those that existed at that time. To the extent that "every American" did not receive six-day delivery in 1983, consistent with the policy of the Act that the Postal Service serve the entire population only "as nearly as practicable," the appropriation provision does not create any new obligation that they do so.

No other information has been identified that is potentially responsive to this request, although somewhat related information may be found in the responses to Carlson interrogatories 60, 61, and 65 (Tr. 14/5542-43, 5548), and to Popkin interrogatories 14 (March 17, 2000) and 115 (April 16, 2000) to the Postal Service, and 12-13 to witness Mayo (Tr. 14/5489-90).

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.



Eric P. Koetting

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