

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

RECEIVED

Oct 1 4 22 PM '01

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(October 1, 2001)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objections to subparts of the following interrogatories, which are dated September 18, 2001, but were filed on September 20, 2001: DBP/USPS-1, 2, 4, 5, 6, 7, 10, 12, 14, 17, 18, 19, 20, 27, 28, and 30.

The 30 interrogatories filed on September 20<sup>th</sup> contain 150 subparts, responses to the overwhelming majority of which the Postal Service anticipates filing later this week. In responding to a number of those questions, the Postal Service will, in effect, be waiving additional objections that it could have filed today. However, the filing of those responses should not be interpreted as a waiver of the Postal Service's right to object to questions which seek additional information that is neither relevant or necessary to the resolution of the issues raised by the complaint in this proceeding.

The issues before the Commission in the instant proceeding are (1) whether the 2000-01 First-Class Mail service standard changes described in the complaint and in the July 30, 2001, Gannon Declaration were implemented in a manner contrary to 39 U.S.C. § 3661 and (2) whether the implementation of those service standard changes means that 2-day and 3-day First-Class Mail service is not being provided in accordance with the policies of the Postal Reorganization Act, within the meaning of 39 U.S.C. § 3662. Considerable information has been provided by the Postal Service in

advance of PRC Order No. 1320 (September 12, 2001). The Postal Service acknowledges that it could be useful to the resolution of this proceeding for parties to obtain additional factual information which is relevant and necessary for those purposes. However, at the same time, there are many levels of postal policymaking and mail processing operational minutiae that are simply not relevant, necessary or material to the resolution of the issues raised by this proceeding. In order to ensure that its limited resources are available to provide pertinent information, the Postal Service must object to requests for information that do not serve the purposes of this proceeding. Accordingly, the Postal Service files these objections.

DBP/USPS-1(a), (c), (e), (f)

These questions refer to paragraph 12 of the July 30, 2001, Gannon Declaration and ask for information which is neither relevant nor necessary to the resolution of issues in this proceeding. There is currently pending another Commission proceeding, Docket No. C2001-1, in which the core issues relate to variations in mail collection and processing by day of the week or holiday, which are the subject of subpart (a). The current case should not be used as a conduit for exploring issues relating to daily and holiday variations in mail processing. It is immaterial to a resolution of the issues raised by the complaint whether mail processing Clearance times vary in relations to factors not related to service standards (subpart (c)). It is equally not relevant to know each activity that takes place between the Clearance Time and departure of mail from a facility and the approximate time associated with each activity (subpart (e)). Moreover, it is irrelevant and unnecessary to the resolution of the issues in this proceeding to know all the Clearance Times for each P&DC, and all reasons why those times may vary from plant to plant (subpart (f)).

DBP/USPS-2(a), (c), (e), (f)

These questions are similar to those objected to above, except that these focus

on Critical Entry Times. There is no nexus between the requested information and the issues in this proceeding. Accordingly, the Postal Service objects to these questions on the same basis.

DBP/USPS-4(c),(d),(e),(f)

These questions seek details of all mailflows among all P&DC's and intermediate facilities. Such minutiae are not necessary or relevant to a resolution of the issues raised by the complaint in this proceeding. The service standards are what they are, irrespective of the manner in which mail flows within or between facilities.

DBP/USPS-5(a),(b),(c)

These interrogatories also request information about Clearance Times which is neither relevant nor necessary to the resolution of the issues raised in the complaint.

DBP/USPS-6(b),(c)

These interrogatories request information about Critical Entry Times which is neither relevant nor necessary to the resolution of the issues raised in the complaint.

DBP/USPS-7(a),(b)

These questions inquire about differences in Clearance Times and Critical Entry Times between facilities and "sub-facilities" and ask the Postal Service to provide a matrix of all the different CT's and CET's among facilities and "sub-facilities." These interrogatories request information at a level of detail which is neither relevant nor necessary to the resolution of the issues raised in the complaint.

DBP/USPS-10(d),(d2),(e),(e2)

The first of these questions seeks information about overnight service standards in a proceeding focused on 2-day and 3-day service standard changes. The requested information is neither relevant nor necessary to a resolution of the issues in this proceeding. The Postal Service objects to the second and third subparts because they request Travel Time information between numerous origin-destination (3-digit?) ZIP

Code pairs, whereas, the service standards at issue in this case are not based on Travel Time between ZIP Code pairs, but from an origin P&DC to a destination ADC level, as reflected in the Service Standards CD-ROM. It is not relevant or necessary to the resolution of the issues in this proceeding to know the precise difference between ZIP Code-to-ZIP Code Travel Times and P&DC-to-ADC Travel Times.

DBP/USPS-12(a),(b)

The first of these questions seeks mail processing operational minutiae which are not necessary or relevant to a resolution of the issues raised by the complaint in this proceeding. The second question -- a request for a listing of "all facilities that ordinarily process outgoing mail on Sunday" -- seeks information irrelevant to the issues in this proceeding and of a nature which appears more to be related to issues in Docket No. C2001-1.

DBP/USPS-14(a),(b)

These interrogatories inquire about the existence of subcategories of EXFC and ODIS data by mail piece type or shape. There are no issues in this proceeding on which the type or shape of a First-Class Mail piece have any bearing. Accordingly, this question seeks information which is neither relevant nor necessary.

DBP/USPS-17(a)

This interrogatory requests information about transportation service utilized in support of current overnight service standards in a proceeding in which the focus is changes between 2-day and 3-day service standards. The requested information is neither relevant nor necessary to a resolution of the issues in this proceeding.

DBP/USPS-18(a)

This interrogatory requests information about reciprocity between P&DC's that are overnight to each other in a proceeding in which the focus is on changes between 2-day and 3-day service. The requested information is neither relevant nor necessary to a

resolution of the issues in this proceeding.

DBP/USPS-19(a)

This interrogatory requests information about the extent to which volume between facilities is evaluated in determining the extent of overnight service in a proceeding in which the focus is on changes between 2-day and 3-day service. The requested information is neither relevant nor necessary to a resolution of the issues in this proceeding.

DBP/USPS-20

This interrogatory requests detailed information about which mail processing operations are conducted on which tours, information which is neither relevant nor necessary to a resolution of the issues in this proceeding.

DBP/USPS-27(g)

This interrogatory requests press releases, directives and other memoranda relating to First-Class Mail service at the time that Air Mail service was eliminated. Such documents, if they could be located, are neither relevant nor necessary to a resolution of the issues in this proceeding.

DBP/USPS-28(a),(b),(c),(d),(e)

These questions pertain to the policies of the Postal Service regarding postmarking of mail and processing of postmarked mail. The requested information is neither relevant nor necessary to a resolution of the issues in this proceeding.

DBP/USPS-30

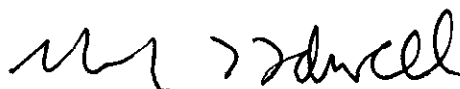
This interrogatory requests, among other things, a listing and copies of any "General Accounting Office reports that have been issued with respect to service standards for First-Class Mail." The Postal Service is not the custodian of reports generated by the GAO. Requests for such documents should be directed to the GAO.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel  
Ratemaking



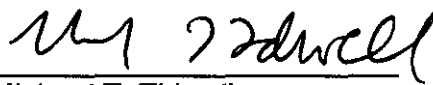
Michael T. Tidwell  
Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson  
P.O. Box 7868  
Santa Cruz CA 95061-7868

David B. Popkin  
P.O. Box 528  
Englewood NJ 07631-0528



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998/ FAX: -5402  
October 1, 2001  
mtidwell@email.usps.gov