

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY DFC/USPS-2 OF DOUGLAS F. CARLSON  
(October 22, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects in part to interrogatory DFC/USPS-2, filed by Douglas F. Carlson on September 27, 2001, on the grounds of relevance and commercial sensitivity. Interrogatory DFC/USPS-2 asks for all Postal Inspection Service or Office of the Inspector General (OIG) audits that have been conducted on Express Mail, Priority Mail, Certified Mail, Registered Mail, Insured Mail, Return Receipt, Post Office Box, or retail window service, or on stamped cards, since January 1, 2000.

The Postal Service responded to this interrogatory on October 11, and provided 2 responsive reports. Based on review of newly identified OIG reports, the Postal Service intends to make additional reports available. However, the Postal Service objects to providing one responsive report, "Delayed Express Mail at a Tampa, Florida Facility on the grounds of relevance and commercial sensitivity.

This report provides results of an audit of Express Mail handling at the Tampa Airport Processing and Distribution Center. Similar to the audit mentioned above, this audit was initiated because of allegations made to the OIG hotline concerning delays

resulting from the abolishment of the Expedited Services Unit and the transfer of *Express Mail handling from the processing and distribution center to another facility* approximately 3 miles away. Shortly after OIG began making inquiries into these allegations, Postal Service management reestablished the unit at the Tampa Airport Processing and Distribution Center. Thus, any delays, whether real or perceived, that occurred as a result of transferring Express Mail handling to another facility, were eliminated when the unit was reestablished at processing and distribution center. Further, the alleged delay occurred in late 1999 and early 2000, and by OIG accounts, delivery scores improved when the unit returned to processing and distribution center. Consequently, the Postal Service fails to see any relevance between this report and proposed FY2003 Express Mail test year prices.

Moreover, the audit provides information on a single postal facility. *Commission's precedents counsel against the release of the disaggregated Express Mail data.* The potential competitive harm of disclosing facility specific information far exceeds any incremental contribution it could foreseeably make to the record in this

proceeding. Therefore, the Postal Service objects on the grounds of commercial sensitivity.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

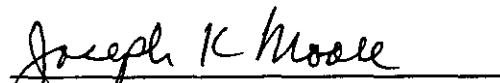
By its attorneys:

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Joseph K. Moore

### 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.

  
Joseph K. Moore

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