

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON  
(October 24, 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 objection to the following interrogatory, which was filed on October 17, 2001: DFC/USPS-1.

The interrogatory requests typical daily volumes of First-Class Mail destinating in each 3-digit ZIP Code area nationwide and originating from each 3-digit ZIP Code area in 11 different Western states and (naturally) New Jersey.

It is believed that responsive data can be generated from the Postal Service's Origin-Destination Information System. However, the Postal Service objects to the interrogatory, to the extent that it appears to expect that responsive data be reported publicly.

It is the long-standing policy of the Postal Service to not disclose such "point-to-point"<sup>1</sup> ODIS data publicly. Although the Postal Service routinely publishes aggregate ODIS data, the Postal Service regards all point-to-point ODIS data to be commercially-sensitive and privileged. Accordingly, it is not reasonable to expect the Postal Service to disclose such data in a manner which would permit its competitors free access.

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<sup>1</sup> Data reflecting the volume of mail or the service performance for mail between specific 3-digit ZIP Code area pairs.

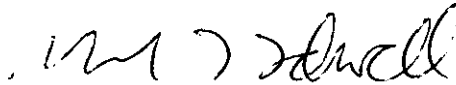
At his earliest convenience, Mr. Carlson may initiate discussions with undersigned counsel regarding the application of protective conditions under which he might obtain access to the requested data strictly for purposes of this litigation and under which the Postal Service's commercial interests would be fully protected.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel  
Ratemaking



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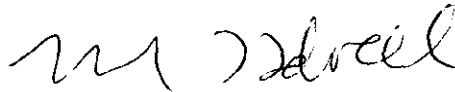
Michael T. Tidwell  
Attorney

### 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  
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