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

POSTAL RATE AND FEE CHANGES, 2001   Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO OCA/USPS-74
(October 30, 2001)

The United States Postal Service hereby objects to interrogatory OCA/USPS-74 on the grounds of relevance, burden and impossibility of providing all of the requested data.

This interrogatory asks for a "copy of the master directory for Express Mail for all ZIP Code pairs, indicating whether noon, 3 p.m., or second-day service is available." It also asks that the Postal Service provide "the master directory in a format that expresses the ZIP code pairs as 'city, state' and or 'town,state' pairs.

The interrogatory is objectionable, first, because it is irrelevant to any costing, rate design or classification issue currently before the Commission. There are a total of 4,096,000,000 possible 3-digit origin/5-digit destination combinations in the country. There is no conceivable reason that the OCA needs to know the service guarantee for every single one of them and whether every single pair is classified as "city, state" or "town, state." It is fanciful to imagine how OCA would even present such data in a useable form, much less make any argument or proposal based on them that would further any material issues in this proceeding. The average consumer, whom OCA represents, normally does not go into a post office and ask for service guarantees on 4 billion ZIP Code

pairs. The information desired by the average consumer is the service guarantee for the destination ZIP Code where his/her package is being sent.

Production of some of the information requested would be extremely burdensome, while some of the data cannot be produced at all. The Express Mail Directory could itself be produced, either on cassette tape or CD, although it would be burdensome to do so. Producing the directory on cassette tape would take a total of about 8 hours; producing it on CD would take a total of about 11 hours. This time includes building the JCL and running the job. Neither burden is justified, given the irrelevance of the information.

Moreover, production of the Express Mail directory would not give OCA the complete information apparently desired. The directory lists only noon and 3pm overnight 3-digit origin/5-digit destination information; it does not list second day guarantees. Production of the 2-day pairs would require that the directory first be expanded/converted from 3-digit origin/5-digit destination to 5-digit origin/5-digit destination, and then somehow matched against another database listing every 5-digit ZIP code in the country. The most likely way to accomplish this would be to use the retail acceptance unit file for 5-digit post offices and somehow merge the two files. Such a merged file does not currently exist. The Postal Service is still trying to determine exactly what it would take to create one, but it is thought that it would be difficult and burdensome to do so. Whether burdensome or not, the Postal Service should not be placed in the position of having to create such a file for information that is not relevant to the issues before the Commission.

In any event, this would only provide the OCA with the service guarantees for the 4 billion plus combinations; it would not classify the combinations as "city, state" and/or "town, state." It currently is not even be possible to provide the requested information in this format since the Postal Service does not maintain its records in this operationally unnecessary manner. To create a file that would give this information, the Postal Service's Address Management group would have to produce a file which creates a "From/To' relationship between *every* active 5-digit ZIP Code, as it could be inaccurate to assume that a "From Memphis 38119 To Washington 20260" would have the same service guarantee as a "From Washington 20260 To Memphis 38119." There are currently 42,736 active ZIP Codes and creating the "From/To" relationship would produce a file with 1,826,365,696 records. Each record would contain a total of 71 bytes, consisting of:

ZIP (from) 5 bytes
City (from) 28 bytes
State (from) 2 bytes
ZIP (to) 5 bytes
City (to) 28 bytes
State (t0) 2 bytes
Service time 1 byte.

With 71 bytes per record, the entire file would thus be 129,671,964,416 bytes, or 129.7 gigabytes. Address Management does not have the storage space to create a file of this size and would thus be required to purchase additional computer hardware. The Postal Service cannot be required to purchase computer equipment to satisfy OCA or any other intervenor's request for data.

The OCA does not seem to realize that the Postal Service, unlike others in the industry, does not enjoy the simplicity of a closed network with reciprocal service between each and every O/D pair. Rather, the Postal Service has an open network or logistics model, which utilizes a national shared air transportation network, commercial air transportation, and local and long-haul ground transportation. That network, serving possible originating points of 38,000 plus retail units, is thus very complicated and service guarantee data on every conceivable combination is not able to be produced without extreme efforts on the part of the Postal Service. The Postal Service should not be required to undergo the burdensome exercise of providing what responsive information it might be able to develop, given the irrelevance of the data sought.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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October 30, 2001

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.

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