

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

Complaint on First-Class Mail Service Standards
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Docket No. C2001-3

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(November 5, 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 were filed on October 29, 2001: DBP/USPS-71(c) and 76.

DBP/USPS-71(c)

This interrogatory requests that the Postal Service provide a list of all instances in which highway contract route trucks carrying mail do not utilize the most appropriate surface route and the effect on travel times for each such route.

The Postal Service contracts for the transportation of mail on thousands of daily runs among hundreds of facilities. For an unspecified period, the question seeks a route-by-route analysis to determine whether the route utilized on any given day by any given truck is "the most appropriate" route. It is safe to assume that somewhere in the postal transportation network some truck or trucks are traveling routes that may not be "the most appropriate." To document each and every such instance would be an extremely burdensome undertaking. There are thousands of such trips per day. It would require that every truck trip be audited and analyzed. It is impossible to calculate the burden of such an undertaking. It is unclear why the information is sought or how it would help the Commission resolve the material legal issues raised by the complaint in this proceeding.

DBP/USPS-76

This question asks about the mode of transportation used to move mail between Honolulu and Hilo, Hawaii. The issues in this proceeding relate to service standard changes that were limited to the 48 contiguous states. The issue of how mail is transported intra-state in Hawaii between Honolulu and Hilo has no bearing on the question of whether the changes at issues comply with 39 U.S.C. §§ 3661 or 3662. Accordingly, the question seeks information which is neither relevant nor necessary to resolve the issues raised in the complaint.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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 all parties of record in this proceeding.

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Michael T. Tidwell

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