

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON  
(November 6, 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 the following interrogatory, which was filed on October 30, 2001: DFC/USPS-9.

For each 3-digit ZIP Code pair that includes at least one 3-digit ZIP Code in various Western states for which the service standard changed from two days to three days in 2000 or 2001, the interrogatory seeks data from the Postal Service's Origin-Destination Information System (ODIS) and its External First-Class (EXFC) data system.

ODIS

ODIS is designed to produce statistically reliable estimates of the volume of First-Class Mail that travels between each 3-digit ZIP Code pair.<sup>1</sup> From ODIS, the requested data would appear to be "point-to-point" estimates of the time-in-transit<sup>2</sup> scores, average days-to-deliver, and proportion of mail delivered in each number of days (overnight, two days, three days, more than three days) for Quarter 4 of Fiscal Years 1998, 1999 and 2001.

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<sup>1</sup> What is commonly referred to as "point-to-point" data.

<sup>2</sup> Measuring from date of postmark to date of arrival in the delivery unit, ODIS provides an estimate of the time-in-transit for First-Class Mail originating and destinating in all 849,106 3-digit ZIP Code pairs.

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 point-to-point ODIS data be reported publicly. It is the long-standing policy of the Postal Service to not disclose such point-to-point ODIS data publicly. Although the Postal Service routinely publishes ODIS data reflecting time-in-transit, days-to-deliver, and proportion of mail delivered each day on a national aggregate basis, the Postal Service regards all point-to-point ODIS data to be commercially-sensitive and privileged. Notwithstanding the restrictions on competition for the delivery of the letter portion of the First-Class Mail stream afforded by the Private Express Statutes and the obligation to publicly report a measure of the quality of First-Class Mail delivery as a whole, disclosure of point-to-point information could harm the commercial interests of the Postal Service by providing its competitors with valuable information regarding the relative degree to which various markets were susceptible to penetration. Accordingly, the Postal Service objects to public disclosure of point-to-point ODIS data.

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

#### EXFC

EXFC is designed to provide statistically valid estimates, by service standard, of the aggregate destinating scores for participating performance clusters.<sup>3</sup> It is not

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<sup>3</sup> Thus, for First-Class Mail delivered to destination A from overnight origins A-H, 2-day origins I-Q, and 3-day origins R-Z, it provides an estimate of the aggregate on-time performance for all mail with a particular service standard (1-day, 2-day, 3-day)

designed to provide statistically valid estimates of specific point-to-point delivery performance between performance clusters.<sup>4</sup>

Accordingly, from EXFC, the requested data from the same time periods would appear to be the destinating scores for each participating EXFC performance cluster for which some of the test mail pieces originated or destined in a Western State EXFC area. For purposes of this interrogatory, this can be presumed to apply to all EXFC destinating areas. Thus, the Postal Service interprets the request as seeking (1) all EXFC performance cluster destinating scores by service standard, (2) a measure of average days to deliver by service standard, and (3) the percentage of mail delivered overnight, in two days, in three days, and more than three days by service standard for each performance cluster. The first two items are publicly available and, accordingly, can be provided in response to this interrogatory. The third element is not routinely published and is considered as commercially sensitive as the ODIS data discussed above. Accordingly, the Postal Service objects to its public disclosure.

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

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destinating in A.

<sup>4</sup> Thus, although 85 performance clusters may participate in EXFC, it is not designed to measure end-to-end on-time performance between any two particular performance clusters.

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

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### **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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