

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
(DFC/USPS-14)
(November 9, 2001)

The United States Postal Service hereby objects to interrogatory DFC/USPS-14. The interrogatory generally requests underlying site-specific information concerning the potential closure of postal facilities. The interrogatory is variously objectionable because responding to it would reveal irrelevant, facility-specific, pre-decisional and proprietary information.

DFC/USPS-14(a) requests “all reports issued in 2001 describing the possibility of closing some mail-processing facilities and consolidating those operations into other facilities.” Subpart (b) asks the Postal Service to “identify the mail-processing facilities that may be closed and the facilities to which their operations would be consolidated.”

Similar information to that requested in DFC/USPS-14 has already been provided in the response of witness Tayman to DMA/USPS-T6-30, filed November 2. Thus, that response indicates the facilities involved, and how the effects of those consolidations are reflected in the rate filing. Witness Tayman’s response provides all of the information that is even arguably relevant to this case. In seeking information beyond that already provided (which, admittedly, had not been provided when DFC/USPS-14 was filed), Mr. Carlson is pursuing materials which are not properly within the scope of

issues to be considered in an omnibus *rate* proceeding. Specifically, any reports relating to the process by which potential facility consolidations were considered would consist of operational details that would not be probative on the entirely distinct set of matters relating to the rates and fees to be charged for specific postal services.

Therefore, the Postal Service objects to providing the reports requested in DFC/USPS-14(a) describing possible facility closure and consolidation. Disclosing such reports would reveal information concerning volumes and productivities at specific sites. Revealing such information has the potential to interfere with labor-management relations, local customer relations, as well as the potential to harm the Postal Service's competitive position. Labor-management relations are particularly critical any time the possibility of consolidations arises, which by their very nature create tension and anxiety.

Further, the Postal Service believes that internal reports of this nature should not have to be produced. Information that served as an input into the decision-making process is protected as pre-decisional. Also, the analysis necessary to determine whether to close a postal facility may be proprietary to the Postal Service, and likely would be of value to competitors.

The information requested in 14(a) is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information requested in 14(b) has already been provided by witness Tayman. For all of the foregoing reasons, the Postal

Service should not be required to respond to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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