

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY DFC/USPS-10
AND MOTION FOR LATE ACCEPTANCE
(November 26, 2001)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this objection to the following interrogatory filed by Mr. Carlson on October 27, 2001: DFC/USPS-10.

The interrogatory requests access to a subset of the Customer Satisfaction Measurement (CSM) data which currently are the subject of motion practice between the Postal Service and the Office of the Consumer Advocate in Docket No. R2001-1 regarding the application of protective conditions.¹

At the time that an objection to DFC/USPS-10 was due to have been filed in Docket No C2001-3 (on or before November 7, 2001), the controversy regarding the application of protective conditions to CSM data in Docket No. R2001-1 was ongoing. Accordingly, it was assumed by undersigned counsel that data responsive to DFC/USPS-10 would be accessed under any protective conditions that were deemed appropriate in Docket No. R2001-1. The Postal Service and the OCA continue to be at loggerheads on the issue of application of protective conditions to CSM survey data in that case. The issue is still before the Commission for resolution in that proceeding.

¹ That motion practice is recapitulated in footnote 1 of the Docket No. R2001-1 OCA Response to the USPS Motion for Leave to Reply to OCA Opposition to Protective Conditions (November 23, 2001).

It is the view of the Postal Service that the resolution of the issue in that proceeding will establish a basis for the resolution the question of access to the subset of CSM data requested in DFC/USPS-10. Informally, the Postal Service informed Mr. Carlson of this view by e-mail dated November 15, 2001. Since that time, the press of other Docket No. C2001-3 and R2001-1 obligations prevented undersigned counsel from filing a formal objection to DFC/USPS-10.

For purposes of formally objecting to DFC/USPS-10 in Docket No. C2001-3, the Postal Service incorporates by reference those of its Docket No. R2001-1 pleadings which are listed in the above-referenced footnote.

Mr. Carlson was informally advised of the Postal Service's objection to DFC/USPS-10 11 days ago. The substance of the Postal Service's objection to disclosure of the data requested by DFC/USPS-10 has been a matter of record since October 9, 2001, when it filed its objection to OCA/USPS-7 in Docket No. R2001-1. Accordingly, no prejudice results to the parties in Docket No. C2001-3 (all of whom are parties in Docket No. R2001-1) as a result of the formal filing of this objection to DFC/USPS-10 today.

For the foregoing reasons, the Postal Service hereby moves that the formal filing of this objection to DFC/USPS-10 be accepted late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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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November 26, 2001

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