

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 DBP/USPS-88
(October 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. Popkin on November 5, 2001: DBP/USPS-88.

The interrogatory loses sight of the forest for the trees. It requests a level of operational minutiae that has absolutely no bearing on the issues raised by the complaint in Docket No. C2001-3. The instant proceeding has been permitted to go forward for the purpose of determining two questions: (a) whether the service standard changes described in the complaint were implemented in a manner consistent with the requirements of § 3661 and (b) whether the current service standards result in the provision of First-Class Mail service consistent with the policies of the Act, within the meaning of § 3662.

Contrary to the thrust of DBP/USPS-88, Docket No. C2001-3 is not about pick-up times at collection boxes. It is not about whether the pick-up times for particular boxes conform to the Postal Operations Manual. There are no issues in the instant docket that turn on whether rural or city deliver service is provided to particular customers. It is not about Clearance Times, since Clearance Times were not a factor in the development of the service standard changes at issue.¹ It is not about whether all mail entered by every conceivable means at every

¹ See Presiding Officer's Ruling No. C2001-3/3 at 2 (November 14, 2001).

conceivable location gets postmarked on the day that it enters the system. Moreover, the purposes of Docket No. C2001-3 will not be advanced by the confirmation (requested by DBP/USPS-88(f)) that things either do or do not always run according to plan. The interrogatory seek information that is irrelevant and unnecessary. The Postal Service should not be burdened with providing such information.

In certain respects, this interrogatory reflects confusion between Docket Nos. C2001-1 and C2001-3 or is an effort to get around the fact that discovery in the former docket concluded some time ago.

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.

Michael T. Tidwell

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