

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO CARLSON INTERROGATORY DFC/USPS -20  
(November 26, 2001)

The United States Postal Service hereby objects to DFC/USPS-20, filed on November 15, 2001. The text of the question is:

**DFC/USPS-20.** This interrogatory refers, in part, to the short newspaper article that appears below from the November 3, 2001, issue of the *San Jose Mercury News*. Please provide all documents and memoranda issued by the San Jose District in 2000 or 2001, including those transmitted by electronic mail, to post offices relating to the removal of collection boxes for security, economic, or other reasons or relating to closing or restricting access to any types of collection boxes or receptacles (e.g., closing lobby parcel drops for security reasons).

Accompanying the question was a copy of a short newspaper item indicating that consideration was being given in the Santa Clara area of California to remove collection boxes from areas "where there is a low volume of business and traffic." The Postal Service objects to this question on the grounds of relevance.

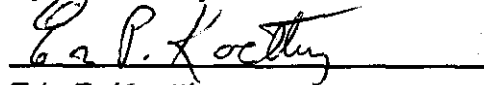
To put the question in some context, it is necessary to note that DFC/USPS-20 was submitted with DFC/USPS-19, which posed a similar question with regard to potential documents issued by Headquarters on the same topic of collection box removal. While the Postal Service questions the relevance of even national level collection box deployment information to a postal *rate* proceeding, it will provide an answer to DFC/USPS-19 despite its relevance concerns. At some point, however, it becomes

necessary to draw the line. Postal rates are set nationwide. Information on operational details such as collection box deployments within a single district would have no probative value in recommending the appropriate set of nationwide postal rates. While Mr. Carlson might find that district to be of particular interest because of his connections to that part of the country, such connections do not endow the information he seeks with any additional relevance. DFC/USPS-20 attempts to elicit information that is inherently irrelevant to the salient issues in this proceeding, and the Postal Service objects on that basis.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

**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.



Eric P. Koetting

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