

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

RECEIVED

Dec 5 4 23 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
DAVID B. POPKIN – DBP/USPS-62(h) through (v)
(December 5, 2001)

The United States Postal Service hereby objects to interrogatory DBP/USPS-62(h) through (v). This interrogatory is objectionable because the requested information is irrelevant. It may also be unduly burdensome to respond to certain parts.

DBP/USPS-62(h) through (v) provides:

- (h) Confirm that there are places in Alaska having postal facilities where access may be achieved by air only.
- (i) Confirm that at locations noted in subpart h above some to all receive mail transportation less than seven days per week.
- (j) Confirm that at locations noted in subpart h above some to all do not have scheduled air transportation seven days a week.
- (k) Confirm that at locations noted in subpart h would require a special unscheduled trip to achieve access all 365 days a year.
- (l) Provide some indication of the cost of making an unscheduled trip to a remote location in Alaska.
- (m) Provide an indication of the number of postal facilities in Alaska that have transportation to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week and less than one day a week.
- (n) Provide an indication of the number of communities in Alaska having postal facilities that have scheduled air service to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week.

- (o) Provide an indication of the number of communities in Alaska to which unscheduled air transportation is available to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week.
- (p) Please explain the method by which the mail would be handled on either a scheduled or unscheduled air trip in Alaska [that was not a scheduled mail trip] with respect to the custody of the mail and the transfer of it to the Postal Service at the delivery point.
- (q) Are there existing agreements with air carriers to provide transportation of the mail on either a scheduled air trip [but not a normal mail trip] or on an unscheduled trip to an Alaska delivery point.
- (r) Please provide copies of such agreements.
- (s) What percentage of the Alaska points that are accessible by air only have such an agreement?
- (t) Confirm that there are places in Alaska having postal facilities where access may be achieved by water only or in addition to air.
- (u) Please provide the data requested in subparts (i) through (s) for those facilities noted in subpart t above.
- (v) Please provide an indication of the extent to which weather and/or other factors in Alaska will prevent scheduled trips from taking place as planned.

Some of these questions cannot even be answered. For example, how is the Postal Service supposed to respond to subpart (l)? What is meant by "some indication of the cost?" Should the response be that it is "expensive" or "inexpensive?" Compared to what? How can a dollar figure be given or even estimated when the type of transportation – "an unscheduled trip"—and the destination – "a remote location" are so vague? Moreover, the cost would be governed by Priority Bush air rates, promulgated by the U.S. Department of Transportation, not the Postal Service or the Postal Rate Commission.

As another example, how can the Postal Service even begin to answer subpart (v)? Of course weather has an impact on transportation in Alaska – it has an impact on transportation throughout the rest of the United States as well. In Alaska and elsewhere, transportation is probably affected by some weather condition somewhere on nearly every single day. It is safe to say that “other factors” – however innumerable they may be – likely affect transportation at locations in Alaska and elsewhere throughout the United States nearly every single day as well. Further, what is meant by the phrase “prevent scheduled trips from taking place as planned?” Does this refer to trips that are cancelled completely, early arrivals, late arrivals, skipping of a planned stop or stops, or all of these?

Even if all of the questions could be answered, there are some where responding would likely be quite burdensome. For example, subparts (m) and (n) request “some indication” of the number of postal facilities and “communities” (however that might be defined) where transportation is received from less than one through seven days a week. If the question is seeking something more than general categorizations, such as “the majority,” “a lot,” or “a few,” then it requires a listing of every postal facility and every “community” in Alaska by how many days a week it receives transportation. This could be unduly burdensome, in light of the fact that the number of days per week that a facility receives transportation probably varies from month to month or even week to week, due to weather conditions.

Even assuming all of the questions could be answered and in a non-burdensome way, none of them are even remotely relevant to this proceeding. While the minutiae of air and water transportation and mail handling in Alaska might be of interest to Mr.

Popkin, these questions delve into operational issues that are not the subject of this or any other proceeding dealing with postal rates, fees and classifications. For instance, on what issues in this proceeding does "the method by which the mail would be handled . . . with respect to the custody of the mail and the transfer of it to the Postal Service at the delivery point" have any bearing whatsoever?

With discovery continuing and hearings fast approaching, the Postal Service should not be forced to spend time responding to these irrelevant inquiries. The Postal Service objects to responding to any of these questions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
December 5, 2001