

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 OCA INTERROGATORIES OCA/USPS -291-293  
(December 6, 2001)

The United States Postal Service hereby objects to OCA/USPS-291, and partially objects to OCA/USPS-292 and 292, all filed on November 26, 2001.

The text of the first question is:

OCA/USPS-291. In the April 2, 2001, issue of *Postal World*, it was reported that:

Major mailers can parlay their volume with USPS into special rates for ads on the Postal Service's delivery trucks, collection boxes and packaging.

Mailers, especially those who are prepared to boost their volume substantially, will be given preferential rates vs. those who are only interested in the truck, collection box or envelope ads alone.

- a. Is this correct?
- b. How much of a discount is given to major mailers?
- c. Why are smaller volume mailers excluded from such discounts?
- d. Please confirm that this practice is a discriminatory to smaller volume mailers. If you do not confirm, then explain fully.
- e. Isn't it correct that this practice can be viewed as an unauthorized discount for large volume mailers without review and action from the Postal Rate Commission? If the answer is negative, then explain fully.

If the Postal Service were to respond to this question, its answer to subpart (a) would indicate that the representations allegedly made in the press are not correct, and the premise for the series of subsequent questions is therefore totally lacking. Regardless of what that answer would be, however, the entire interrogatory lacks relevance to the issues in this proceeding. The structure of

the charges made by the Postal Service to entities wishing to use postal vehicles and facilities for their advertising is not part of the Postal Service's request for a recommended decision. Those types of charges are well outside the jurisdiction of the Commission. Moreover, the latter parts of the question call for legal conclusions that are an inappropriate objective of discovery.

The objection to questions 292 and 293 is only partial. The questions are:

OCA/USPS-292. Please compare end-of-the-day mailbox collection times for the following fiscal years: FY1995, FY 1997, FY1999, FY2000, and FY2001.

- a. State separately for each of the five fiscal years listed, re weekday collections, the percentage of mailbox end-of the-day collection times occurring at earlier than 2 p.m., 2 p.m. – 2:59 p.m., 3 p.m. – 3:59 p.m., 4 p.m. – 4:59 p.m., 5 p.m. – 5:59 p.m., 6 p.m. – 6:59 p.m., and 7 p.m. or later.
- b. State separately for each of the five fiscal years listed, re Saturday collections, the percentage of mailbox end-of the-day collection times occurring at earlier than 10 a.m., 10 a.m. – 10:59 a.m., 11 a.m. – 11:59 a.m., 12 p.m. – 12:59 p.m., 1 p.m. – 1:59 p.m., 2 p.m. – 2:59 p.m., 3 p.m. – 3:59 p.m., 4 p.m. – 4:59 p.m., 5 p.m. – 5:59 p.m., and 6 p.m. or later.

OCA/USPS-293. What was the number of Sunday mail box collections for each of the following fiscal years: FY1995, FY 1997, FY1999, FY2000, and FY2001?

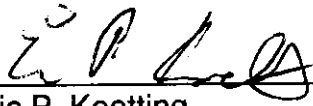
The level of operational detail sought in these questions appears to go beyond that possibly relevant or material to the recommendations to be made by the Commission in this case on the proposed rates and fees. While the Postal Service expects to file a response providing those portions of the information requested that is available, it does not intend for its responses to be construed to

concede the relevance or materiality of that information.

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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