

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 POPKIN INTERROGATORY DBP/USPS -93  
(December 27, 2001)

The United States Postal Service hereby objects to DBP/USPS-93, filed on December 17, 2001. The text of the question is attached. The Postal Service objects on the grounds that the interrogatory is not appropriate follow-up and is therefore untimely, that the material sought is inherently irrelevant and immaterial, and that it would be unduly burdensome to produce most of the information requested.

Question 93 seeks a variety of information about collection box schedules, and therefore seeks similar information as that sought in OCA/USPS-292, the previous question cited. Review of question 93, however, reveals that it is not a follow-up to the response to OCA/USPS-292, but rather a follow-up to the question itself. Stated more plainly, Mr. Popkin is merely seeking to expand the scope of the OCA's question, rather than follow-up on the Postal Service's response to the OCA's question. While Mr. Popkin may wish that the OCA had asked a broader question, his opportunity to broaden the scope of the question expired on November 26<sup>th</sup>. Attempting to pose his broader inquiry as follow-up does not make his untimely question timely.

Question 93 also seeks information on operational matters at a level of detail that is beyond any level that might be relevant or material to the issues to be resolved in this proceeding. For example, where OCA/USPS-292 sought information broken down into hour increments, Mr. Popkin in subparts b. and c. now seeks information broken down

into 15-minute increments.<sup>1</sup> As another example, subpart g. requests reasons why collection boxes would be collected on less than all five weekdays. (Once again, this question clearly constitutes a new line of inquiry, and certainly does not directly relate to anything in the question or answer to OCA/USPS-292.) While Mr. Popkin may find such information to be of interest to him, there is no nexus between that type of information and the rates and fees to be recommended by the Commission.

Lastly, it would be unduly burdensome for the Postal Service to have to generate most of the information requested. Specifically, parts a.-d. seek finer breakdowns of information already provided in response to the OCA's question, and would require further programming to extract. To respond to the OCA's request, personnel at San Mateo spent approximately 40 hours. While there might be somewhat less time required to address Mr. Popkin's questions, it is still estimated that it would take the better part of one entire work week to generate information in the format he has requested in subparts a.-d. Of course, personnel at San Mateo are not ordinarily involved in rate case support work, so this workload would fall on top of their necessary responsibilities, which they are already hard pressed to meet because of the time previously devoted to the OCA's request.

Subparts e.-g. relate to collection boxes scheduled for weekday pickup. From the CBMS database, it is possible to provide (without additional burden) the extremely high

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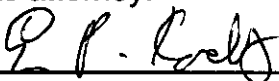
<sup>1/</sup> Moreover, although the Postal Service provided all available information in response to OCA/USPS-292, the Postal Service, in its partial objection filed on December 6, specifically disputed the relevance and materiality of the information sought by the OCA in that question. The purpose of that partial objection was to preserve the Postal Service's rights in anticipation of precisely this type of attempt to use the OCA's inquiry as a springboard for even more far-reaching excursions into operational minutiae.

(virtually 100) percentage of collection boxes scheduled for weekday pickup, and the extremely small (virtually zero) percentage of collection boxes not scheduled for weekday pickup. Mr. Popkin's question, however, appears to seek information about collection boxes that might receive pickup on some but not all five weekdays. Such information is not contained in the CMBS database, in which the only relevant field merely contains information on weekday (M-F) pickup. Therefore, to the limited extent (if any) that the circumstances contemplated in these subparts exist, the Postal Service has no simple way to attempt to obtain information regarding them. Obviously, it would be unduly burdensome to attempt to delegate to the field the chore of examining every collection box at the local level merely to ascertain whether any meet the apparent subject of interest to Mr. Popkin. Therefore, it would be unduly burdensome for the Postal Service to be required to respond to subparts a.-d. and e.-g. of DBP/USPS-93.

Respectfully submitted,

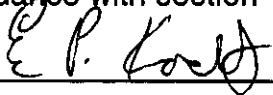
UNITED STATES POSTAL SERVICE

By its attorney:

  
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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.

  
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Eric P. Koetting

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December 27, 2001

DBP/USPS-93 Please refer to your response to OCA/USPS-292. [a] Please provide a breakdown of the <2 weekday category into the following categories: earlier than 8 AM, 8 AM to 8:59 AM, 9 AM to 9:59 AM, 10 AM to 10:59 AM, 11 AM to 11:59 AM, 12 Noon to 12:59 PM, 1 PM to 1:59 PM. [b] Please provide a breakdown of the 4 PM to 4:59 PM weekday category into the following categories: 4 PM to 4:14 PM, 4:15 PM to 4:29 PM, 4:30 PM to 4:44 PM, and 4:45 PM to 4:59 PM. [c] Please provide a breakdown of the 5 PM to 5:59 PM weekday category into the following categories: 5 PM exactly, 5:01 PM to 5:14 PM, 5:15 PM to 5:29 PM, 5:30 PM to 5:44 PM, and 5:45 PM to 5:59 PM. [d] Please provide a breakdown of the <10 Saturday category into the following categories: earlier than 8 AM, 8 AM to 8:59 AM, 9 AM to 9:59 AM. [e] Please advise the percentage of the total number of boxes that are collected on all five weekdays. [f] Please advise the percentage of the total number of boxes that are collected on less than all five weekdays. [g] Please explain the reasons for those boxes that appear in the response to subpart f. [h] Please advise the percentage of the total number of boxes that are not collected on Saturday. [i] Please explain the reasons for those boxes that appear in the response to subpart h.