

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF DOUGLAS CARLSON TO SUSPEND PROCEEDINGS
(January 7, 2002)

On December 31, 2001, Mr. Carlson filed a response to Presiding Officer's Ruling No. C2001-1/16, and a motion to suspend proceedings in this docket until March 1, 2002. The stated purpose of the motion to suspend is to allow for possible developments that may occur before that date in his FOIA lawsuit currently pending in federal court. To the extent that Mr. Carlson "remains convinced" that access to the CBMS database would "add substantial value" to the testimony he intends to submit concerning early collections on holiday eves, the Postal Service remains equally convinced that it would not. In fact, when evaluated in the context of the trends over time in holiday service already acknowledged by the Postal Service in the Answer it filed well over one year ago during the very earliest stages of this proceeding, it appears that little value has been added by any of the discovery material sought and obtained by Mr. Carlson. The fact that less outgoing mail service is being provided on and around holidays in recent years is not and has not been disputed. What matters, and what nothing in the CBMS database would illuminate, is whether this trend (i.e., tending to treat more outgoing mail on holidays the same as incoming mail has always been treated on holidays) results in postal services which fail to conform with the policies of

the Act. That core issue has been ripe for resolution for months, and the Postal Service questions any possible utility of awaiting potential further information before reaching it, particularly when the information in question would not aid in its resolution. Nevertheless, Mr. Carlson is the party who initiated this proceeding, and if he prefers to suspend it, the Postal Service does not oppose his motion.

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:

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