

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF DOUGLAS CARLSON
(October 22, 2002)

The United States Postal Service hereby responds to the October 15, 2002, motion to compel a further response to interrogatory DFC/USPS-9. As is made clear below, there is no need for the Presiding Officer to grant the motion.

On October 3, 2002, Mr. Carlson directed an e-mail message to undersigned counsel seeking the data identified in his motion. At the time, undersigned counsel was out of the country and did not return until the following week. Upon reviewing the e-mail message, about a week after it was sent, counsel relayed Mr. Carlson's request to postal personnel capable of causing responsive EXFC and ODIS information to be generated and awaited their responses.

As with the data originally filed in response to DFC/USPS-9, generation of the additional EXFC information requires the procurement of services, from the contractor responsible for operating the EXFC system, that are beyond the terms of the current EXFC contract.

In contrast, the ODIS information is generated internally by the Postal Service. However, counsel did not discover until some days after relaying the ODIS request internally that the responsible manager was out of the office for an extended period. The request was then re-transmitted to the person acting in his place.

On October 16, 2002, counsel heard from both the EXFC team and the ODIS team. The EXFC team reported that necessary procurement hurdles had been cleared and that the requested data could be generated. Both groups projected schedules for the generation of information responsive to Mr. Carlson's request. Given other priorities facing both the EXFC contractor and the ODIS team, each team projected that their respective tasks related to DFC/USPS-9 would likely be completed by the end of this month. Assuming the data generated are responsive, a brief review by personnel directly involved in Docket No. C2001-3 should result in expeditious disclosure.

Information to that effect would have been transmitted in an e-mail on or soon after October 16, 2002, to Mr. Carlson. Instead, the Postal Service found itself obliged to respond to his October 15, 2002, motion to compel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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October 22, 2002

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 all parties of record in this proceeding.

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