

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

REPORT OF THE UNITED STATES POSTAL SERVICE
IN REPLY TO PRESIDING OFFICER'S RULING NO. C2001-3/35
(April 9, 2003)

In accordance with Presiding Officer's Ruling No. C2001-3/35 (April 2 2003), the United States Postal Service hereby files this status report regarding outstanding discovery in this case.

General

The Postal Service has provided a wealth of local operations data in response to discovery in this proceeding. A lot of that information is not centrally stored and has been retrieved from various sources throughout the postal network. Double-checking the continued accuracy of such information is an arduous task when organizational and personnel changes occur over time. As one might expect, local postal operations are always subject to routine modification. For instance, a truck that formerly departed a Processing & Distribution Center at 06:30 for a particular Area Distribution Center may now depart and arrive 20 minutes later than indicated in an earlier interrogatory response. And three months from now, that truck may shift to a different schedule. It is not the Postal Service's intention to revise previously filed answers to reflect all such changes, when such revisions would have no bearing on any material issue in this case. The Postal Service has nearly completed the review of previously filed responses and expects to do so by April 16, 2003. If the Postal Service determines that any previously filed responses need to be changed in any material way, amendments or supplemental responses will be filed expeditiously.

As always, if there are discovery matters outstanding that parties wish to bring to the attention of the Postal Service, they are encouraged to continue to do so informally, but to be specific (e.g., identify the interrogatory) in communicating their concerns.

DBP/USPS-23

The Postal Service has conducted an exhaustive, but relatively unproductive search for responsive historical records reflecting the First-Class Mail service standard matrix. A small number of quarterly records, in CD-ROM or diskette form, have been located and are the only known copies. The Postal Service will file a list identifying these documents tomorrow and will initiate communications before the end of this week with Mr. Popkin to explore the possibility that a reasonable and mutually acceptable agreement can be reached regarding the most efficient method for him to access them without undue burden to him or the Postal Service.

Only this week, another potential source of responsive documents was identified. Counsel awaits further information from the field on this possibility and expects to be able to report no later than April 14, 2003, whether this trail will lead to any additional responsive information. If it does, a second list will be filed and further communications regarding access will be initiated.

DFC/USPS-13

An answer to this interrogatory is being drafted and will be filed no later than April 11, 2003. The answer will be responsive, but will explain why very specific information cannot be generated.

DBP/USPS-47

The aforementioned anticipated response to DFC/USPS-13 will elaborate further on why there are no records from which could be generated, for instance, a 3-digit ZIP Code origin-destination matrix identifying First-Class Mail subject to air transportation, either before or after the disputed service standard on the basis of service standard.

The Postal Service considers that this response, while disappointing to some, will further clarify why such information has never existed in any manner susceptible to easy extraction and why it is virtually impossible to generate it currently. The response will describe a plan, unrelated to this proceeding, for the development of such information in the future.

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 all parties of record.

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April 9, 2003
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