

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

EXPERIMENTAL PRIORITY MAIL FLAT-RATE  
BOX, 2004

Docket No. MC2004-2

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
(July 2, 2004)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objections to indicated subparts of the following interrogatory, filed on June 22, 2004: OCA/USPS-T2-6 b,f, and g. This interrogatory reads:

OCA/USPS-T2-6. Please confirm that free Carrier Pickup, requested online at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa>, was launched on Sunday, February 1, 2004, in selected locations.

- a. If you cannot confirm, please state any additional facts that would make the statement correct.
- b. Also, please provide a copy of the Postal Service's public and internal announcements of the new pickup service.
- c. Please state whether the free Carrier Pickup service cited above is available in all ZIP codes across the nation. If not, which ZIP codes cannot use this service?
- d. If some ZIP codes are excluded from participation, what are the criteria for inclusion/exclusion?
- e. Please confirm that the Carrier Pickup service cited above was not available at the time that Docket No. R2001-1 was filed by the Postal Service with the Postal Rate Commission. If you cannot confirm, please explain why not.
- f. Please confirm that the Postal Service indicated nowhere in its filings in Docket No. R2001-1 that the Carrier Pickup service cited above would be available at a future date. If you do not confirm, provide cites to the Postal Service's Docket No. R2001-1 filing that refer to the new Carrier Pickup service.

g. Please confirm that, in its Docket No. R2001-1 filing, the Postal Service did not explicitly account for the differences in cost that might arise from the Carrier Pickup service cited above. If you do not confirm, provide cites to all documents filed by the Postal Service in Docket No. R2001-1 that explicitly account for the Carrier Pickup service costs.

h. Prior to implementation of the free Carrier Pickup service cited above, what methods of entry into the postal system for Priority Mail packages, by means of postal carriers, were available to mailers? If free Carrier Pickup is not available in all ZIP codes, then are the methods noted in the preceding sentence those that are (and will be) available during the period of the Flat-Rate Box experiment for ZIP codes not participating in free Carrier Pickup? Please explain.

The Postal Service objects to subparts b, f, and g of this interrogatory. The principal ground for objection is relevance, since the scope of the Postal Service's proposal in this case is a very limited one, presenting merely an additional mailing option for Priority Mail customers. The proposed flat-rate boxes would be eligible for carrier collection on identical terms as all other Priority Mail, and other types of mail. The Postal Service's recent promotion of such carrier pickup services is peripheral, at best, to the case at hand. Therefore, while the Postal Service will respond to other parts of this interrogatory relating to the fact that flat rate boxes will be collected in the same manner as other Priority Mail, we will resist any effort to expand the scope of this proceeding into an examination of carrier collection activities. For this reason, the Postal Service objects to producing copies of the Postal Service's public and internal announcements of the "new" pickup service.<sup>1</sup> The Postal Service also objects on grounds of relevance and undue burden to confirming the non-existence in the record of Docket No. R2001-1 of facts relating to the allegedly new pickup service. In any

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<sup>1</sup> Interrogatory responses forthcoming from the Postal Service should correct the false assertion underlying this interrogatory that carrier collection activities are a "new" function performed by carriers.

event, those matters of public record speak for themselves and can be searched out by the OCA itself. The OCA is capable of conducting an extensive, comprehensive and time-consuming record search if it chooses, despite that fact that the outcome of such a search will have no bearing on the Postal Service's proposal in this docket. In any event, the Postal Service has not performed such a search.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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### **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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July 2, 2004