

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY DFC/USPS-8 OF DOUGLAS F. CARLSON
(April 25, 2005)

For the reasons stated below, the United States Postal Service hereby files its objection to interrogatory DFC/USPS-8, filed by Douglas Carlson on April 14, 2005.

The interrogatory requests that the Postal Service:

. . . explain the extent to which EXFC scores for overnight, two-day, and three-day First-Class Mail delivery and PETE scores for Priority Mail delivery directly affect postal managers' compensation.

The Postal Service objects to this question because it seeks information irrelevant and immaterial to the costing and pricing raised by the Request in this proceeding. The extent to which or the manner in which the salaries of any postal employees are affected directly or indirectly by such factors as service performance achievement have no bearing on the rates or fees that the Commission may recommend for any postal service in this docket. Parties are entitled to pursue discovery on a wide range of topics related to ratemaking in an omnibus rate case. However, this does not give them *carte blanche* to use discovery to pursue their interest

in various topics unrelated to ratemaking. Accordingly, the Postal Service objects to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

/s/
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

/s/
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, FAX: -5402
April 25, 2005
michael.t.tidwell@usps.gov