

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

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF DOUGLAS F. CARLSON
(DFC/USPS-20 - 21)
(May 2, 2005)

As indicated below, the United States Postal Service hereby files its objections to the above-referenced interrogatories, filed by Mr. Carlson on April 20, 2005.

DFC/USPS-20

This interrogatory seeks Headquarters directives regarding collection box removals:

DFC/USPS-20. Please provide all memoranda and directives issued by Postal Service headquarters since January 1, 2002, including those transmitted by electronic mail, relating to removal of collection boxes or collection receptacles.

Mr. Carlson's request, practically speaking, is the same as an earlier request posed in this docket by Mr. Popkin:

DBP/USPS-2. [a] Please provide copies of any directives that have been issued at either the Headquarters level or at the Area level since the last rate case with respect to instructions or guidelines for either the times to be posted for collection boxes or for the addition or removal of collection boxes.

On April 18, 2005, the Postal Service objected to DBP/USPS-2(a), noting that it corresponded to DBP/USPS-5(a) in Docket No. R2001-1 and DBP/USPS-20(a) in Docket No. R2000-1. In Ruling No. R2000-1/56 (May 2, 2000), the Presiding Officer

denied a motion to compel a response to DBP/USPS-20(a). Thus, when Mr. Popkin posed the same question again in Docket No. R2001-1, the Postal Service filed an objection to subpart (a). Objection of the United States Postal Service to Popkin Interrogatories DBP/USPS-4, 5(a), and 6 (December 4, 2001). Presumably in light of the Presiding Officer's Ruling on the same question in Docket No. R2000-1, Mr. Popkin did not file a motion to compel in Docket No. R2001-1. Yet he nonetheless filed the same question again in this docket, and, as noted above, on April 18, the Postal Service objected, on the same grounds its objection to a very similar question was upheld in Docket No. R2000-1. On the same grounds, the Postal Service objects to DFC/USPS-20 now posed by Mr. Carlson.

DFC/USPS-21

This question likewise relates to collection boxes:

DFC/USPS-21.

- a. Please provide the number of collection boxes of all types except Express Mail that were operated by the Postal Service as of April 1 in years 1999, 2000, 2001, 2002, 2003, 2004, and 2005.
- b. For each year, please identify the database from which the data were extracted.
- c. Please confirm that data from the Collection Box Management System (CBMS) reflects data available at the headquarters level and that this data may have differed from the data maintained in the CBMS at the district level. If you do not confirm, please explain.
- d. Please explain whether data from the Collection Program Management System that is available at the headquarters level may differ from data maintained in the CPMS at the district level.

The Postal Service objects to DFC/USPS-21 on several grounds. First, the level of operational detail sought with regard to collection boxes is neither relevant nor

material to this proceeding. At issue in this case are postal rate proposals for 2006, not fluctuations in operational practices in earlier years. Particularly irrelevant are potential differences in the Postal Service's internal databases, the subjects of subparts (c) and (d). Second, portions of this request, like that of DFC/USPS-20, closely relate to a similar request from Mr. Popkin (in this instance, DBP/USPS-1). The Postal Service on April 18 partially objected to Mr. Popkin's similar request on the grounds of relevance.

Without waiving its relevance objection, however, the Postal Service on April 25, 2005, provided a substantial amount of information to Mr. Popkin on collection boxes, in response to DBP/USPS-1 and 3. Preparing that information for Mr. Popkin took approximately five full days of staff time at Headquarters, a commensurate amount of staff time at the computing center in San Mateo, and a significant amount of supervisory time and attention to direct these efforts. Because of the general lack of nexus between operational data systems and rate case matters, rate case support is not an activity for which these types of system resources have been designed and staffed. Consequently, any time and resources devoted to responding to rate case discovery necessarily reduces the time and resources available to conduct the functions for which these systems were created in the first place.

In light of this background, the burden associated with attempting to provide Mr. Carlson any further quantitative information (i.e., in response to the first subpart of DFC/USPS-20) in addition to that already provided in response to Mr. Popkin would be particularly undue. The overlap between what Mr. Carlson has requested and what Mr. Popkin has obtained is substantial. The data now available are already more than sufficient for purposes of this proceeding. (It may be noted that, in terms of the second

subpart of Mr. Carlson's request, the responses submitted to Mr. Popkin already identify the source database of the information provided.)

Therefore, for the reasons and on the grounds specified above, the Postal Service objects to DFC/USPS-20 and DFC/USPS-21.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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.

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