

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 THE OCA (OCA/USPS-7a-c,e-h)
(May 9, 2005)

The United States Postal Service hereby files its objections to the above-referenced interrogatories, filed by the OCA on April 29, 2005.

The objectionable subparts are as follows:

- a. Please confirm that none of these quarterly reports was filed in conformance with Commission Rule 102, 39 C.F.R. §3001.102, which provides: "Each report listed in this section shall be filed with the Secretary of the Commission within two weeks of its presentation for use by postal management (b) *Quarterly reports*. The following information will be filed by the Postal Service quarterly: . . . (2) Origin/Destination Information Report National Service Index;" i.e., none were filed on a quarterly basis throughout FY2004. If this statement is not confirmed, then please explain.
- b. Confirm that, prior to the filing of LR K-82, the last ODIS quarterly report filed with the Commission was for Quarter 4, FY 2003, and was filed on October 20, 2003. If this statement is not confirmed, then please explain.
- c. Confirm that no quarterly ODIS reports were filed with the Commission for a period of nearly 1 ½ years. If this statement is not confirmed, then please explain.
- e. Confirm that, even following the merger of the ODIS-RPW systems, 3 quarterly RPW reports were filed with the Commission, i.e., on April 16, 2004 (Quarter 1, FY2004); May 14, 2004 (Quarter 2, FY2004); and August 6, 2004 (Quarter 3, FY2004).
- f. Give a detailed explanation of why the Postal Service filed 3 RPW quarterly reports in FY2004, but did not file any ODIS reports.
- g. Has the Postal Service filed any quarterly ODIS-RPW reports with the Commission for FY2005? If not, why not.
- h. Does the Postal Service intend to comply with Commission Rule 102 by filing quarterly ODIS or ODIS-RPW reports in the future? If not, why not? If so, what will be the filing schedule?

The questions are not calculated to lead to admissible evidence relevant to issues generated by the filing of the Postal Service's request in this docket. Instead, they seek to pursue matters related to the Commission's periodic reporting rules. See 39 C.F.R. § 102. Therefore, the Postal Service objects to these subparts of OCA/USPS-7.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Michael T. Tidwell

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.

Michael T. Tidwell

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