

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

PARTIAL OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA (OCA/USPS-5 and 6)
(May 9, 2005)

As indicated below, the United States Postal Service hereby files partial objections to the above-referenced interrogatories, filed by the OCA on April 27, 2005.

Question 5 reads:

OCA/USPS-5. Do any postal employees receive training in the use or maintenance of DOIS? If so, please describe the training and provide (1) copies of training materials and (2) copies of Postal Service documents referred to in the training materials.

As it turns out, no hardcopy DOIS training materials exist, because the training is done on-line. The Postal Service and the OCA are working informally to overcome this hurdle. A potential problem exists, however, with respect to the breadth of the last portion of the request, relating to documents referred to in the training. This request is so sweeping that there could be a wide variety of documents encompassed within its terms. Many of those documents may be internal Postal Service documents with no relevance whatsoever to ratemaking matters. It is possible that some of them could be sensitive documents not intended for public dissemination, although that is, at this point, a mere possibility. It is also possible that the burden associated with producing some of these documents could be excessive. At this point in time, the Postal Service is willing

to work (and is working) informally with the OCA to address these matters in a way that reasonably balances the needs of both sides. As the OCA becomes more aware of what DIOS is (and is not), the hope is that the focus can be narrowed to items of actual relevance. At this time, however, the Postal Service wishes to preserve its potential objections on the grounds of overbreadth, relevance, privilege, and burden. If it turns out that, after further informal exchanges, there remain some items in contention, the Postal Service anticipates that it would be able to more clearly articulate specific grounds for objection with respect to specific items.

It may be useful now, however, to make some points of general relevance about DOIS and the Postal Service's city carrier cost study. In preparing to reexamine city carrier cost after many years of reliance on old approaches and old data studies, the Postal Service devoted a great deal of time and effort to assembling the most useful input data available. Potential sources of input data were examined, with an eye toward avoiding the numerous types of problems that can occur if data intended for one use are misapplied to another use. The result of these efforts was the set of input data that the Postal Service's witnesses have provided and sponsored in this case. In certain instances, that set of input data relates to DOIS and its predecessor system, DSIS. In some instances, DOIS and DSIS pulled information from other programs to provide the data. Those data, however, are not generated in DOIS. DOIS merely provides a gateway to the information platform where the data are held, and is a means to produce quick and easy reports. In that sense, it merely provides a format for printing out input data. There are, moreover, other aspects of DOIS that have nothing to do with the carrier cost study data set.

The Postal Service understands that parties may be interested in pursuing potential alternative sources of input data, relative to the analysis data set used by the Postal Service. Nevertheless, it bears mention that parties venturing outside that data set need to be prepared to accept the limitations of the alternative data upon which they wish to rely. More to the point, all participants need to be concerned about the expenditure of large amounts of time and effort in pursuit of alternative data sources which are unlikely to be fruitful.

Which brings us to OCA/USPS-6. Question 6 reads:

OCA/USPS-6.

Please refer to the response of witness Bradley to interrogatory OCA/USPS-T14-3.c. He states, "Route miles' . . . were not collected in the City Carrier Street Time Study"

- a. Do carriers travel a specified line of travel when performing the delivery function for letters, flats, sequenced mail and small parcels? If not, under what circumstances would a carrier deviate from the authorized line of travel to deliver letters, flats, sequenced mail, or small parcels?
- b. Is the length of the authorized line of travel for the routes in witness Bradley's analysis known or recorded at any management level in the Postal Service? If so, please provide the lengths by route identifier.

The Postal Service is willing to file an affirmative response to subpart a, and a partial response to subpart b that such information is generally known at the delivery unit level and may also be available in some format within a national database residing in Minnesota. The problems arise with the subsequent portion of subpart b, which request that the information be gathered and provided.

This request is problematic because it would require an attempt to gather information regarding approximately 3,400 routes. If attempts were made to compile

such information from local records, it would require contacting each responsible delivery unit, requesting the information, riding herd on those units that do not respond, and ultimately compiling their responses into a useable data set that can be matched to the study data set. It is estimated that such an effort would take many weeks of calendar times to complete, and involve many hours of effort, both at Headquarters and in the field.

Alternatively, if attempts were made to extract available information from the national data base, it is unclear exactly what such an effort would entail. Since the study team did not seek to utilize this potential source of information, there is no firm basis to predict how much time and effort would be involved. Prior experience, however, suggests that expectations of simple data extraction and matching prospects are unlikely to be fulfilled. On that basis, our best guess is that we would expect perhaps two weeks of labor, spread over four weeks of calendar time. This time, of course, would be coming at the height of discovery from those parties seeking to understand the study actually conducted by the Postal Service.

Assuming the data could be provided, however, there would still be a serious question regarding the utility of these data. This question relates to the fact that the study in question was performed in 2002, three years ago. Data available now would not necessarily correspond to data applicable to the study period. If routes have been restructured, sorting out what remains valid from what is not would be a cumbersome and labor-intensive process. Moreover, the ultimate result might still be current data that simply do not match the route data in the study data set. This complication calls into question the utility and relevance of the entire exercise. The potential burden of

producing the data would need to be evaluated in the context of their questionable utility, and the Postal Service submits that the burden would be undue.

Therefore, for the reasons and on the grounds specified above, the Postal Service partially objects to OCA/USPS-5 and 6. The Postal Service, however, is working with the OCA on these matters, and believes that informal resolution may still be possible.

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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