

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

Postal Rate and Fee Changes, 2005

Docket No. R2005-1

**DOUGLAS F. CARLSON
MOTION TO COMPEL
THE UNITED STATES POSTAL SERVICE
TO RESPOND TO INTERROGATORY DFC/USPS-20(c)**

May 13, 2005

On April 20, 2005, I filed interrogatory DFC/USPS-20.¹ This interrogatory reads as follows:

- 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.

¹ Douglas F. Carlson Interrogatories to the United States Postal Service (DFC/USPS-20-23), filed April 20, 2005.

The Postal Service filed an objection to DFC/USPS-20 on May 2, 2005.²

For part (a), the Postal Service's objection notes that the Postal Service provided similar information in its response to DBP/USPS-1.³ Based on the substantial overlap of the information sought in part (a) with the information provided in response to DBP/USPS-1 — information provided after I filed my interrogatory — I will not move to compel a response to part (a). Similarly, a response to part (b) is unnecessary.

The Postal Service notes that the information provided in response to DBP/USPS-1 was obtained from the "Collection Box Management Database (CBMS)." Assuming that CBMS actually stands for Collection Box Management System, part (c) of DFC/USPS-20 properly examines the accuracy of the data provided in the response to DBP/USPS-1. The Postal Service presumably queried data held in the CBMS at the headquarters level. I believe that CBMS data at the headquarters level do not represent the most-current data; rather, districts maintain CBMS data at the district level, and these data are periodically uploaded to headquarters. If so, data at the headquarters level may not reflect current conditions as of the date of each query. DFC/USPS-20(c) represents a simple and relevant question to examine the accuracy of the data provided in the response to DBP/USPS-1. The presiding officer has previously ruled that the "reliability or accuracy of relevant data is nearly always relevant." POR R97-1/89 at 3.⁴ The number of collection boxes in service directly affects the value of Express Mail and First-Class Mail service, so the data provided in the response to DBP/USPS-1 are relevant to issues in this proceeding. Therefore, since DFC/USPS-20(c) properly attempts to evaluate the reliability or accuracy of relevant data, this interrogatory is reasonably calculated to lead to the discovery of admissible evidence.

² Objections of the United States Postal Service to Interrogatories of Douglas F. Carlson (DFC/USPS-20–21) ("Objection"), filed May 2, 2005.

³ Responses of the United States Postal Service to Interrogatories of David Popkin (DBP/USPS-1, 3), filed April 25, 2005.

⁴ POR R97-1/89, filed January 27, 1998.

Rule 26(c) requires an objecting party to state the bases for objection “clearly” and “fully.” The Postal Service’s objection does neither. In fact, the only specific objection stated to part (c) is that “potential differences in the Postal Service’s internal databases” are “[p]articularly irrelevant.” Objection at 3. Part (d) of this interrogatory inquires into a possible lag in the data of the Collection Point Management System, which is replacing the CBMS.⁵ While parts (c) and (d), when taken together, may identify differences in Postal Service databases, part (c) also independently evaluates the accuracy of relevant data provided in response to DBP/USPS-1. The Postal Service fails to articulate any objection to DFC/USPS-20(c) as a stand-alone interrogatory.

For the reasons stated herein, and because the Postal Service has failed to state an objection to DFC/USPS-20(c) in satisfaction of the requirements of Rule 26(c), I move to compel the Postal Service to respond to DFC/USPS-20(c).

Although DFC-USPS-20(d) will become relevant as soon as the Postal Service provides data from the Collection Point Management System, I will not move to compel a response to this interrogatory part at this time; rather, I will reserve the right to compel a response to a new interrogatory on this subject at the time that the accuracy of data provided from the CPMS becomes relevant.

Respectfully submitted,

Dated: May 13, 2005

DOUGLAS F. CARLSON

⁵ The interrogatory incorrectly refers to this system as the Collection Programs Management System. The Collection Point Management System is described in the 2004 Comprehensive Statement on Postal Operations at Chapter 2.F.6.