

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 OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORIES
TO WITNESS BRADLEY (OCA/USPS-T14-13)
(May 13, 2005)

The United States Postal Service partially objects to the following interrogatory of the OCA, filed on May 3, 2005: OCA/USPS-T14-13.

The interrogatory reads as follows:

OCA/USPS-T14-13. You have presented Census data by ZIP Code for the square miles of territory covered. The ZIP Codes you have used are encoded. Independent research on the data and subsequent matching of data are accordingly impossible. Please provide the following data by encoded ZIP Code for the same year as your square-mile data:

- a. Number of households.
- b. Population
- c. Income per household (please state whether median, average, or whatever basis)
- d. Housing units
- e. Housing units in multiunit structures
- f. Pct of population with bachelor's degree
- g. Persons under 18
- h. Annual non farm payroll
- i. Number of employers
- j. Number of establishments
- k. Retail sales per capita
- l. Persons per square mile.
- m. FHP and TPF for the mail processing plant servicing the ZIP Code.

Witness Bradley can respond to subparts b, d, and l, as that information has already been provided, either explicitly or implicitly. Parts a, c, and e-k, however, seek further

census data, beyond what has been provided. The data sought, moreover, are from the same time period as the previous data. The Postal Service is concerned that it might not be able to get additional data for that time period, or that it might be unduly burdensome to do so. That possibility, however, is being explored. In addition to potential burden, the potential relevance of some of the requested items to evaluation of Prof. Bradley's study of city carrier costs (or reasonable variations thereof) is not self-evident.

In addition to those concerns about parts a, c, and e-k, the Postal Service particularly objects to part m. This subpart seeks not census data, but MODS data (FHP and TPF) for the mail processing plant servicing the area from which each set of carrier data were collected. The relevance of these data is quite questionable, given that actual delivery volume data have already been provided. Much more aggregated MODS data would seem to be far removed from carrier cost incurrence. Beyond relevance, the Postal Service is quite concerned that, with the large amount of demographic data by ZIP Code that is being requested, if parties were to be able to identify ZIPS in the carrier database, with the information sought in part m, they could cross walk the MODS information provided by witness Bozzo and identify the facilities in his database. The Postal Service considers the risk of that occurrence too great to be willing to provide the information requested from witness Bradley in 14(m), and objects on the grounds of relevance, materiality, privilege and commercial sensitivity, when the marginal utility of that information to the carrier analysis is not likely to be substantial.

Therefore, the Postal Service partially objects to parts a, c, e-k, and m of OCA/USPS-T14-13. If able to do so with reasonable burden, the Postal Service will respond to parts a, c, and e-k, without waiving its relevance objection. The Postal Service, however, is currently unwilling to provide a response to part m, for the reasons stated above.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 13, 2005

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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