

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
(DFC/USPS-49)
(May 27, 2005)

The United States Postal Service hereby objects to interrogatory DFC/USPS-49, filed by Douglas F. Carlson on May 17, 2005. The interrogatory reads as follows:

DFC/USPS-49. For each day of the week, please provide the percentage of accepted Express Mail volume that is guaranteed for delivery on the next day, the second day, and the "second delivery day."

The Postal Service objects to this interrogatory on the grounds of relevance and vagueness. By asking for certain Express Mail data for "each day of the week," Mr. Carlson is seeking a level of detail as to Express Mail service that is beyond the scope of the material issues in this proceeding. Express Mail rates are determined on an aggregate basis, without regard to the day of the week, and any daily variations that a response to this interrogatory may show would not bear on the overall value of Express Mail service.

In addition, by not specifying any time frame for which such daily data should be provided, this interrogatory is overly vague, and potentially overbroad. Mr. Carlson simply asks for data for "each day of the week," without elaboration as to the time period that he is interested in. Without such a specified time frame, however, this interrogatory

potentially seeks an excessive amount of data, in addition to its fundamental lack of materiality to this proceeding.

The Postal Service therefore objects to interrogatory DFC/USPS-49 on the grounds of relevance and vagueness.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Keith E. Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252; Fax -3084