

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-47)  
(May 27, 2005)

As indicated below, the United States Postal Service hereby files its objection to the above-referenced interrogatory, filed by Mr. Carlson on May 17, 2005.

The interrogatory reads:

**DFC/USPS-47.**

- a. Please provide the total number of collection boxes that were in service as of the most-recent date for which data are available. In your response, please identify Express Mail and non-Express Mail collection boxes separately.
- b. Please identify the data system from which the data provided in response to part (a) were derived or obtained.

The Postal Service objects to this request on the grounds of relevance and cumulative burden.

While challenging its relevance in a partial objection, the Postal Service on April 25 filed a comprehensive list of collection boxes, by type, for FY01, FY02, FY03, and FY04, in response to DBP/USPS-1. For each year, the information provided was that as of the end (or, in the instance of FY03, very near the end) of the fiscal year. Thus, Mr. Carlson already has available to him information through the end of FY04. As the last full year for which information is available, FY04 is the base year in this proceeding.

Thus, for example, actual cost information has been provided in this case through the end of FY04. Therefore, partial year information for a period beyond the base year, such as that now sought by Mr. Carlson, lacks relevance in circumstances such as this, in which complete information for the base year has already been provided.

Moreover, there was a substantial amount of time and resources expended by the Postal Service, at both Headquarters and in San Mateo, in providing the information that has already been provided thus far. That burden was discussed on page 3 of the Postal Service's May 2 objection to DFC/USPS-20 - 21, which was a previous effort by Mr. Carlson to obtain data similar to that now requested in DFC/USPS-47. There would be an additional burden in providing updated information at Mr. Carlson's request, even assuming that the request could be met with reference to a national database. This burden would be unjustified, given that the information already provided should be more than adequate. If Mr. Carlson can obtain the "most recent" information now, can he do so again in three weeks, or in six weeks, or in nine weeks? The cumulative burden of such a series of requests would be obvious. The sensible approach to complex litigation is to cut off updates at a reasonable point in time. That point in time is the end of FY04, and the Postal Service has already provided information through that date.

Therefore, for the reasons and on the grounds specified above, the Postal Service objects to DFC/USPS-47.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

### **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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Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, FAX: -5402  
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