

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 OFFICE OF THE CONSUMER ADOVCATE
(OCA/USPS-T5-1-2)
(June 2, 2005)

Pursuant to Rule 26(c), the United States Postal Service hereby objects partially to interrogatories OCA/USPS-T5-1-2, filed on May 23, 2005. The respective interrogatories state:

OCA/USPS-T5-1. For each quarter or other postal reporting period in FY 2000 through 2005, please provide city-carrier-delivered volumes by class and subclass of mail. Please cite your sources and provide copies of all source documents.

OCA/USPS-T5-2. For each quarter or other postal reporting period in FY 2000 through 2005, please provide city-carrier-delivered volumes by class and subclass of mail by shape. Please cite your sources and provide copies of all source documents.

The Postal Service is prepared to respond affirmatively to these interrogatories with respect to periods of time up to and including the base year in this docket, FY 2004. As such, data from any more recent period have no bearing whatsoever on the proposals that constitute the heart of this docket. Data from FY 2005 are therefore not relevant. In addition, these interrogatories' focus on volume delivered by city carriers requires data from the City Carrier Cost System (CCCS), a subject of the testimony of witness Harahush. CCCS is designed to provide annualized estimates; since FY 2005

is not complete, nor are its estimates yet finalized. This decrement in accuracy further attenuates the relevance of CCCS data.

Accordingly, the United States Postal Service objects partially to interrogatories OCA/USPS-T5-1-2.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083, FAX -3084