

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

ERRATUM TO OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA (OCA/USPS-74-76)
(OCA/USPS-74-77 *ERRATUM*)
(June 7, 2005)

Yesterday, the Postal Service filed an objection to interrogatories OCA/USPS-74-76. Through circumstances that counsel have been unable to explain, interrogatory OCA/USPS-77, which was supposed to have been included in the objection, was omitted. The reasoning behind the objection to OCA/USPS-77 is the same as was provided for OCA/USPS-74-76. As such, the erratum consists of adding OCA/USPS-77 to the objection. Aside from inclusion of OCA/USPS-77, the entire objection is repeated below.

As indicated below, the United States Postal Service hereby objects to interrogatories OCA/USPS-74-77, filed by the OCA on May 27, 2005. The Postal Service objects on the grounds of burden, relevance, and privilege.

Those questions read:

OCA/USPS-74. Please provide, separately for each delivery unit in the ZIP Codes in file AL161ZIPS.PRN, screen shots from DOIS, Supervisor Workbench, Daily Workload Mgmt, Capture Mail Volumes—Manual, Category: AM Available, Units: Pieces, showing delivery unit Totals for Letters (Pcs), Flats (Pcs), Seq Ltrs (Sets), Seq Flts (Sets), Parcels, Priority, DPS (Pcs), Caseable Automated Letters, and Caseable Automated Flats, for the following time periods: May 15-28, 2005; February 13-26, 2005; November 12-25, 2004; August 13-26, 2004; May

14-27, 2004. If the same data are available on a weekly basis, please provide them in lieu of daily data.

a. Please explain the difference(s) between Ltrs (Pcs), DPS (Pcs), and Caseable Automated Letters. How does one calculate total letter-shaped pieces?

b. Please explain the difference(s) between Flts (Pcs) and Caseable Automated Flats. How does one calculate total flat-shaped pieces?

OCA/USPS-75. With respect to the screen shots requested in interrogatory OCA/USPS-74, what choices other than "AM Available" exist? Please provide a screen shot of each possible choice.

OCA/USPS-76. Please provide the same information requested in interrogatory OCA/USPS-74 for the last two complete weeks (Sunday to Saturday) in February, May, August, and November of 2002 and 2003, and February 2004.

OCA/USPS-77. Please provide, on a daily basis, screen shots from DOIS showing the clock time for scan for first delivery point and the clock time for scan for last delivery point corresponding to the days in the same time periods, same ZIP Codes, and same delivery units requested in OCA/USPS-74 and OCA/USPS-76.

Initially, it is important to understand what these questions appear to represent.

The Postal Service has several witnesses in this case sponsoring a new analytic and empirical approach to the study of city carrier costs. See the testimonies of witnesses Bradley (USPS-T-14), Stevens, and Kelley. These witnesses, and indeed, many other personnel, both postal and contractor, spent huge amounts of time and effort to develop a theoretical approach, identify the data needed to implement such an approach, identify the best potential sources of such data in light of rate case standards for data quality, obtain the data, analyze the data, and present the study methods and results pursuant to rate case documentation standards. Anyone who has spent even a cursory amount of time reviewing the materials filed by the Postal Service on this topic

understands that this was no small undertaking.

The OCA questions seem to be intended to elicit a new database, based on a significantly expanded time period, to address city carrier costing. This contrasts sharply with other OCA discovery requests that are directed at, for example, the ability to augment the Postal Service input data by bringing to bear additional Census information relevant to the Postal Service's observations. Thus, whether the analytic framework would be the same or not, the OCA's apparent purpose in questions 74-77 would be to construct a new empirical framework for analysis.

The method the OCA has chosen to achieve this objective is reflected in the questions. The OCA has requested a large number of "screen shots" that would be accessed by the Postal Service through DOIS. A screen shot is just a reproduction of the information portrayed on the computer monitor when data is pulled up in a particular format. A screen shot can be a hard copy printout, or an electronic version of the hard copy. In question 74 alone, the OCA has requested approximately 20 thousand screen shots. Conservatively estimating a time of 4 minutes per shot, the Postal Service estimates that it would take 1280 work hours and several calendar months to produce the screen shots requested in that question, assuming that the data were actually available. To respond to question 76 would require an additional 30-35 thousand screen shots, and an additional effort of almost twice that required to respond to question 74. On its face, therefore, this request is unduly burdensome.

Beyond that, the utility of the data would be questionable. If the screen shots were produced as hard copy, the information would have to be re-keyed. Even if the screen shots were provided electronically, it would be analogous to providing thousands

of pages of spreadsheets in PDF format, rather than Excel. The output of the exercise would be cumbersome, at best. Also, the screen shots requested would contain information that the Postal Service does not disclose, such as volumes by facility, and carrier names. The inclusion of that type of information forms the basis for the privilege objection. Any necessary efforts to delete such information might enable avoidance of disclosure of proprietary or privacy-related information, but would, of course, add to the burden.

Moreover, even if some alternative means could be devised to extract some or all of this information, there would be a major effort involved in reviewing what has been pulled and organizing it. These activities greatly add to the potential burden, but also highlight another fundamental flaw in this effort. There will be gaps in the data available through the sources that the OCA has identified. There is, for example, no apparent way to deal with parcels or accountables within the sources from which the OCA has requested information. Also of concern is the nature of the carrier time requested by the OCA, and its relationship to the requested volumes. Problems that the Postal Service study was designed to avoid would once again be injected into a database derived as requested by the OCA.

These issues call into question the relevance of the body of information the OCA has requested. It is possible that after undertaking a tremendous burden to produce what has been requested, the result could be a set of data that cannot be used for anything. The focus of this proceeding should be on the materials the Postal Service has already undertaken great efforts to provide, not on an alternative set of materials of questionable utility. If the reaction to the Postal Service's new approach to city carrier

costing is favorable, there might be merit in exploring new sources of certain data along the lines suggested by the OCA. But the OCA is putting the cart before the horse in seeking to impose an undue burden on the Postal Service by requesting information from sources that were not designed for rate case quality information, when rate case quality data have already been provided.

Therefore, for the above reasons, the Postal Service objects to OCA/USPS-74 through 77.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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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