

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
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-118)
(June 13, 2005)

The United States Postal Service hereby files a partial objection to the above-referenced interrogatory filed by the Office of the Consumer Advocate on June 1, 2005.

OCA/USPS-118 requests that the Postal Service provide ODIS-based percent and frequency data for mail delivered within 1 to 20 days for Parcel Post; Bound Printed Matter; Media Mail; and Library Mail. For each mail class for which data exist, it is the Postal Service's intention to provide responsive data for each day of the published service standard range and to aggregate data beyond the range of the service standard. From these data, it will be possible to know the estimated percentage of mail delivered within standard and the percentage of mail not delivered within standard for each service standard day for each mail class. Otherwise, consistent with its June 1, 2005, objection to OCA/USPS-60, the Postal Service considers that a further disaggregation of the data would result in the disclosure of privileged, commercially sensitive data for a range of competitive services. Such disclosure would not be in keeping with good business practice. Moreover, insofar as the question seeks a disaggregation of data beyond the service standard range, it seeks data that are immaterial to the issues in this proceeding.

Rate case discovery provides an opportunity to examine non-privileged service performance data that can be reasonably expected to have some material bearing on ratemaking, but those examinations must be reined in when they seek privileged data or when they obsess on minutiae that have no bearing have no bearing ratemaking. For purposes of taking into account available estimates of service performance in assessing the value of service for a mail class within the meaning of 39 U.S.C. § 3622(b)(2), the Postal Service considers that it is sufficient to disclose that a percentage of mail is or is not delivered within the delivery standard range for a mail class. When the aggregate percentage of late pieces is known, analysis of the percentage of any late pieces that were one day vs. three days vs. five days late has no material bearing on ratemaking.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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