

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 UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE.
(OCA/USPS-T7-6-7)
(June 17, 2005)

The United States Postal Service hereby objects to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T7-6-7.¹ The interrogatories state:

OCA/USPS-T7-6. For each month or postal reporting period in FY 2000 through 2004, please provide volumes by class and subclass of mail. Please cite your sources and provide copies of all source documents.

OCA/USPS-T7-7. For each month or postal reporting period in FY 2000 through 2004, please provide volumes by class and subclass of mail by shape. Please cite your sources and provide copies of all source documents.

The Postal Service objects to these interrogatories on the grounds that they are cumulative and redundant, not relevant, and that the production of answers would be unduly burdensome.

By requesting "volumes by class and subclass", these interrogatories effectively request data reported by the ODIS-RPW system, the subject of witness Pafford's testimony, USPS-T-4. Witness Pafford provides estimates of revenue, pieces and weight ("RPW") data for base year 2004 in his testimony together with measures of the statistical reliability of the reported results. USPS-T-4 at 1. Of significance to the OCA interrogatories' scope, witness Pafford explains that the extensive probability sampling

¹ This objection was prepared and finalized for filing on May 30, 2005; its absence was only just discovered. A motion for late acceptance will be filed as soon as possible, June 20, 2005.

system used to develop these results are designed to develop quarterly results. Id. at 6, 8, 10. Data for the base year in this docket are accordingly provided in quarters as well.

Quarterly RPW data are also provided to the Commission; indeed, quarterly reports over the time span covered by the instant interrogatories are already available.

So interrogatories OCA/USPS-T7-6-7, by requesting monthly information, request information that is less statistically precise and that covers a span of time for which data are already available.

The latter of these interrogatories further requests data broken down by shape. Such data are not routinely produced and are not currently available. The Postal Service has yet to determine whether it is possible to reconstruct such estimates. Assuming that the critical input data can be found, it is estimated that 2.5 to three months would be necessary plus payment to a contractor of about \$80,000. For these reasons, responding to OCA/USPS-T7-7 would, in addition to being cumulative, redundant, and irrelevant, be unduly burdensome to provide a response. However, it is possible that if the OCA is prepared to fund the work, the contractor may nonetheless be persuaded to go forward on this.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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