

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 THE OCA (OCA/USPS-143)  
(June 20, 2005)

As indicated below, the United States Postal Service hereby objects to the above-referenced interrogatory, filed by the OCA on June 10, 2005.

Question 143 reads:

OCA/USPS-143. Please list and describe all Postal Service databases (including archives) at any level of management that contain information for any dates for any routes in any ZIPs for which any data were collected for the CCSTS relating to delivered volumes, street time, street activities, carrier type (e.g., REG, PTF, T-6, etc.), overtime street hours (actual or projected), modes (Foot, NDCBU, etc.) for route sections and/or delivery points, number of carriers who delivered mail on a route on the same date, volume delivered by each carrier who delivered mail on a route on the same date, number of routes without an assigned carrier, volume by shape in bulk deliveries, number of sequenced mailings by shape.

This question constitutes yet another OCA fishing expedition regarding databases (rather than specific data) relating to city carrier costing. To the extent this question seeks information about sources of information maintained on a national basis, it repeats questions that have been asked and answered. The Postal Service has already answered numerous OCA questions about DOIS and the systems that feed into DOIS. To the extent that it inquires about data systems containing information directly

requested in OCA/USPS-140, this question serves no useful purpose.<sup>1</sup> If the data exist and can be furnished in response to question 140, further information on “all” of the data systems in which such data might be found would be superfluous. If the answer to question 140 reveals that the data do not exist, then obviously there are no sources of information to discuss. But question 143 does not track question 140 exactly, and includes very broad categories such as delivered volumes and street times. And by attempting to sweep so broadly to include information “at any level of management,” question 143 would impose the burden of attempting to assess what sub-national sources of information (such as specific local offices might have) potentially exist, even when the information they might contain would merely duplicate what is in national systems. Any systematic attempt to obtain sub-national information would involve weeks of effort.

To the extent that this question relates to national sources of information, the Postal Service objects that the OCA questions on this topic are cumulative, and to the

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1 Part of the same set, Question 140 requests:

[OCA/USPS-140](#). Please provide by ZIP (encoded), by route, by date, for all ZIPs for which any data were collected for the CCSTS, the following information. The OCA will accept data from any source and in any medium.

- a. The number of delivery points by route section by mode (Foot, NDCBU, etc.)
- b. The number of sequenced mailings
- c. The number of sequenced mailings with detached address labels
- d. Number of carriers who delivered mail on a route
- e. Volume by shape for each carrier who delivered mail on a route
- f. Overtime street hours (actual or projected)
- g. Routes without an assigned carrier
- h. Volume in bulk deliveries by shape
- i. Carrier Type (*e.g.*, REG, PTF, T-6, etc.) for each carrier who delivered mail on a route

extent that this question relates to sub-national sources of information, the Postal Service objects on the grounds of burden. Both formally and informally, the OCA has already been furnished in this proceeding with ample material on the available types of sources of information on delivery matters.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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

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