

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 OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-177)  
(June 27, 2005)

As indicated below, the United States Postal Service hereby objects to the above-referenced interrogatory, filed by the OCA on June 20, 2005.

Question 177 reads:

OCA/USPS-177. For any and all Postal Service databases that contain information relating to delivered volumes, delivery of accountables, delivery of large parcels, 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, please provide:

a. The data file structure(s), record structure, field descriptors, field lengths, field types, and all means for accessing and retrieving data. If data consists of alphanumeric values, please provide a detailed description of the use of the alpha characters and provide a copy of any and all necessary conversion factors, *e.g.*, positive or negative values, numeric substitutes, end of field characters, etc.

b. A copy of the data files for the period FY 2002 to present and instructions for accessing and extracting data. Please provide all files in either a SAS or EXCEL compatible format. The OCA will accept encoded ZIP Codes and other confidentiality measures that are consistent with Presiding Officer's Ruling No. R2005-1/20, June 8, 2005.

The overbreadth of this question is stunning. It both seeks information about and information from any databases whatsoever that bear on mail processing at the delivery end of the Postal Service network. Further, the information is to be processed into specific forms, further analyzed and vetted for data quality, apparently documented to support any conceivable use of the data, with all methods of accessing data evaluated, without limitation to national level

information, and apparently diced into a matrix of nearly twenty simultaneous parameters including an unbounded reference to dates and speculative conversion factors. The only hint that this question exists in a real world is the recognition that some of the information might be sensitive.<sup>1</sup>

The short answer to the interrogatory is that no survey that would identify all qualifying databases has ever been conducted, and nor has the need to do so ever been established. The OCA has been inquiring into data relating to delivery since the beginning of this docket. It has proven capable of asking questions that have potential for leading to the discovery of admissible evidence; unfortunately, OCA/USPS-177 regresses from that standard.

Another short answer to the interrogatory is that the OCA has already identified, asked extensive questions about, and gained insight into the national level systems used for delivery operations and costing. This interrogatory, however, asks broad questions about activities that relate to much of the work performed by the Postal Service, without any limitation to national systems<sup>2</sup>; as such it constitutes yet another OCA fishing expedition regarding databases 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, answered and/or subjected to motions practice. The Postal Service accordingly objects that OCA/USPS-177 is overbroad, cumulative, irrelevant (since it extends to how an individual carrier might do her job), burdensome (burden cannot even be quantified given the breadth of

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<sup>1</sup> Given that OCA/USPS-177 effectively seeks all information pertaining to the Postal Service's delivery network, some information is necessarily commercially sensitive. Were UPS or Fed Ex asked to provide all details of their delivery networks, any reasonable observer would expect them to object and assert that protective conditions would be insufficient to protect the grave commercial sensitivity of all that information. The Postal Service is no different in this respect.

<sup>2</sup> Postal Service national data systems generally run on mainframe computers; despite a willingness to receive data in any format – a concession absent from OCA/USPS-177 – one can naught but wonder what the OCA would do were it presented with hundreds of 9-track tapes. Converting data from its native mainframe form to Excel or SAS, as requested in this interrogatory, accordingly presents its own burden issues that far exceed other burdens identified in this docket, which have run to the many tens of thousands of dollars even when not consuming effort of individuals whose jobs are dedicated to sustenance of postal operations.

the question), and seeks commercially sensitive information.

Most recently on June 20, the Postal Service filed its objection to interrogatory OCA/USPS-143, which is very similar to OCA/USPS-177.<sup>3</sup> As that objection further points out, OCA/USPS-143 is itself an iteration of OCA/USPS-140.<sup>4</sup> The Postal Service has already answered numerous OCA questions about delivery, including DOIS, the many systems that feed into DOIS, Confirm, performance tracking and special services, all of which have some implications related to delivery. The only purpose served by this interrogatory is to illustrate, by way of silly comparison, that previous OCA discovery requests, some of which have drawn objections for being overbroad and burdensome, can be exceeded by further inquiries. The Postal Service's accommodation of the OCA's interests and attempt to foster realistic focus by providing some material through informal channels, both as text/images and in the form of personal access to experienced delivery personnel, in hindsight now appears to have been counter productive.

To the extent OCA/USPS-177 inquires about data systems containing information directly requested in OCA/USPS-140, this question serves no useful purpose. If the data exist and can be furnished in response to question 140, further information on "all" of the data

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<sup>3</sup> The Postal Service hereby attempts to save a tree and incorporates by reference the argument contained within *Objection Of The United States Postal Service To Interrogatory of the OCA (OCA/USPS-143)* (June 20, 2005).

<sup>4</sup> Part of the same set as question 143, Question 140 requests:

[OCA/USPS-140](#). Please provide by ZIP (encoded), by route, by date, for all ZIP [Code]s 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

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.

To the extent OCA/USPS-177 relates to national sources of information, the Postal Service objects that the OCA questions on this topic are cumulative, and to the extent that this question relates to sub-national sources of information, the Postal Service objects on the grounds of relevance and burden. Both formally and informally, the OCA has already been furnished in this proceeding with ample material on the available types and sources of information on delivery matters, and more is yet to come. This interrogatory, however, cannot lead to constructive additions to the record in this docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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