

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
INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-90-97, 99)
(June 30, 2005)

The United States Postal Service hereby objects to the interrogatories DFC/USPS-90-97 and 99, filed by Douglas F. Carlson on June 20, 2005.

DFC/USPS-90-97

These eight objectionable interrogatories all purport to be follow-up to interrogatory DFC/USPS-76, which reads, and was answered, as follows:

DFC/USPS-76. Please refer to the response to DFC/USPS-58.

(a) Please select a weekday between June 6, 2005, and June 17, 2005. For an average origin ZIP Code on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.

(b) For an average origin ZIP Code on Saturday, June 11, 2005, or Saturday, June 18, 2005, please provide the number of ZIP Codes to which Next Day Service is available.

(c) Please select a weekday between June 6, 2005, and June 17, 2005. For an average origin ZIP Code on the selected weekday, please provide the number of addresses to which Next Day Service is available.

(d) For an average origin ZIP Code on Saturday, June 11, 2005, or Saturday, June 18, 2005, please provide the number of addresses to which Next Day Service is available.

For this interrogatory, data for an average origin ZIP Code may be calculated by adding the number of ZIP Codes (or addresses) to which Next Day Service is available for each origin ZIP Code nationwide and then dividing this sum by the total number of ZIP

Codes. If a different calculation is used to define an average origin ZIP Code, please explain the calculation. If an average origin ZIP Code cannot be calculated, please provide the data for a typical or representative origin ZIP Code.

RESPONSE:

Please see the response to DFC/USPS-58 for a discussion of an "average origin ZIP Code." The data below is provided for ZIP Code 10001.

- (a) ZIP Code 10001 would service 16,577 ZIP Codes Next Day if acceptance is on Monday, June 6th, 2005.
- (b) ZIP Code 10001 would service 8,830 ZIP Codes Next Day if acceptance is on Saturday, June 11th, 2005.
- (c) ZIP Code 10001 would service 82.5 million addresses if acceptance is on Monday, June 6th, 2005.
- (d) ZIP Code 10001 would service 64.8 million addresses if acceptance is on Saturday, June 11th, 2005.

Interrogatories DFC/USPS-90-97 are as follows:

DFC/USPS-90. Please refer to the response to DFC/USPS-76.

- a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 94612 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.
- b. For origin ZIP Code 94612 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.
- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 94612 on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- d. For origin ZIP Code 94612 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-91. Please refer to the response to DFC/USPS-76.

- a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 30304 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.
- b. For origin ZIP Code 30304 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.

- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 30304 on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- d. For origin ZIP Code 30304 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-92. Please refer to the response to DFC/USPS-76.

- a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 48233 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.
- b. For origin ZIP Code 48233 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.
- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 48233 on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- b. For origin ZIP Code 30304 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.
- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 30304 on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- d. For origin ZIP Code 30304 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-93. Please refer to the response to DFC/USPS-76.

- a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 38130 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.
- b. For origin ZIP Code 38130 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.
- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 38130 on the selected weekday, please provide the number of addresses to which Next Day Service is available.

d. For origin ZIP Code 38130 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-94. Please refer to the response to DFC/USPS-76.

a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 83708 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.

b. For origin ZIP Code 83708 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.

c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 83708 on the selected weekday, please provide the number of addresses to which Next Day Service is available.

d. For origin ZIP Code 83708 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-95. Please refer to the response to DFC/USPS-76.

a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 63155 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.

b. For origin ZIP Code 63155 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.

c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 63155 on the selected weekday, please provide the number of addresses to which Next Day Service is available.

d. For origin ZIP Code 63155 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-96. Please refer to the response to DFC/USPS-76.

a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 60607 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.

b. For origin ZIP Code 60607 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.

- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 60607 on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- d. For origin ZIP Code 60607 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

DFC/USPS-97. Please refer to the response to DFC/USPS-76.

- a. Please select a non-holiday weekday between June 20, 2005, and July 5, 2005. For origin ZIP Code 51101 on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.
- b. For origin ZIP Code 51101 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of ZIP Codes to which Next Day Service is available.
- c. Please select a non-holiday weekday between June 25, 2005, and July 5, 2005. For origin ZIP Code 51101 on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- d. For origin ZIP Code 51101 on Saturday, June 25, 2005, or Saturday, July 2, 2005, please provide the number of addresses to which Next Day Service is available.

Interrogatories DFC/USPS-90-97 seek the same information as DFC/USPS-76 (though for a slightly different time period) for eight additional 5-digit ZIP Codes. As such, they are all objectionable on relevance grounds, as information about Express Mail at the level of 5-digit ZIP Codes is simply irrelevant to this proceeding. While the Postal Service considered Mr. Carlson's request in DFC/USPS-76 that it provide the requested data for a single ZIP code to be objectionable on relevance grounds, it decided to provide the data for a single ZIP Code—10001—in the interests of reducing motions practice. At this point, however, the Postal Service must object to dedicating resources to producing further localized Express Mail data which is completely irrelevant to a determination of Express Mail rates.

The Postal Service also notes that Mr. Carlson easily could have asked for data for any of these ZIP Codes during the initial round of discovery, and as such they are objectionable as improper follow-up when this fact is combined with their fundamental irrelevance. The Postal Service should not be penalized for choosing to respond to DFC/USPS-76 by subsequently being forced to supply further irrelevant information for sundry five-digit ZIP Codes, especially at this stage of the proceeding.

DFC/USPS-99

This objectionable interrogatory reads as follows:

DFC/USPS-99. Please refer to the response to DFC/USPS-76. Please list the three digit ZIP Code areas that were eligible for Express Mail Next Day Service from origin ZIP Code 10001 on Saturday, June 11, 2005. If the information for June 11, 2005, is no longer available, please provide this information for June 25, 2005, or July 2, 2005.

As noted above, the response to DFC/USPS-76(b) stated that ZIP Code 10001 would service 8,830 ZIP Codes Next Day if acceptance is on Saturday, June 11th, 2005. While the Postal Service considered Mr. Carlson's request in DFC/USPS-76 that it provide the requested data for a single ZIP code to be objectionable on relevance grounds, it decided to provide the data for a single ZIP Code—10001—in the interests of reducing motions practice. The Postal Service should not be required, however, to provide even more detailed information with regard to this individual 5-digit ZIP Code. To require the Postal Service to provide an actual list of those ZIP codes would not lead to relevant information in this rate case.

Therefore, the Postal Service objects to the above-referenced interrogatories. In addition, the Postal Service notes that DFC/USPS-98, which is a follow-up to DFC/USPS-14, is untimely since the response to DFC/USPS-14 was filed on May 26,

2005. While the Postal Service will nevertheless answer this interrogatory, it will strongly consider objecting to any subsequent follow-up.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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