

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES DBP/USPS-1, 3, 6, 18 AND 19  
(February 21, 2006)

The United States Postal Service hereby submits objections to the following interrogatories of David Popkin, filed on February 15, 2006: DBP/USPS-1, 3 and 6. The Postal Service also hereby submits objections to the following interrogatories of David Popkin, filed on February 17, 2006: DBP/USPS-18 and 19.

DBP/USPS-1

This interrogatory initiates the discovery phase of Docket No. N2006-1 by egregiously seeking to abuse it. The question merely points to an earlier Commission proceeding – Docket No. C2001-3 -- and asks the Postal Service to file in the instant docket an update to each and every interrogatory response filed in the earlier case.

Docket No. C2001-3 was a complaint proceeding initiated under 39 U.S.C. § 3662. It sought a determination of whether First-Class Mail service was being provided in a manner consistent with the policies of the Postal Reorganization Act as a result of the Postal Service's 2000-01 completion of the implementation of the 2-day and 3-day First-Class Mail service standard changes that were reviewed by the Commission in Docket No. N89-1. In contrast, the current docket seeks the Commission's opinion on a different matter -- whether it would conform to the policies of

the Postal Reorganization Act for the Postal Service – going forward -- to implement service changes that will result from pursuit of the objectives of its Evolutionary Network Development strategy.

Each docket, in its own way, deals with mail class service standards. However, by itself, that does make the issues raised in the first docket -- or the questions asked or the answers provided therein -- relevant to or within the scope of the issues in the second docket. Matters explored in Docket No. C2001-3 are not presumptively material or relevant to the issues raised by the Docket No. N2006-1 request. The responsibility rests with interrogating parties to analyze the specific issues raised by the current request and to propound specific questions that reflect some material nexus to those specific issues. This interrogatory fails to do so.

#### DBP/USPS-3

This interrogatory requests all changes that have been made to the service standards applicable to each mail class on a quarterly basis for each of the approximately 850,000 3-digit ZIP Code pairs in the national postal system since the conclusion of Docket No. N89-1. Such information is neither material nor relevant to the issues raised by the request in this proceeding. The current docket seeks the Commission's opinion on whether it would conform to the policies of the Postal Reorganization Act for the Postal Service – going forward -- to implement service changes that will result from pursuit of the objectives of its Evolutionary Network Development strategy. The baseline in this case is the service standards as they apply to the current 3-digit ZIP Code matrix for each mail class. Those service levels are

reflected in the Attachment to USPS-T-1 (as revised today) and in USPS Library Reference N2006-1/2. The issue raised by the Docket No. N2006-1 request is whether it would conform to the policies of the Act for the Postal Service – going forward -- to make changes in service for the reasons explained in that request. Therefore, it is beyond the scope of this proceeding to seek a historical compilation of previous changes. Accordingly, the Postal Service objects to this interrogatory.

Moreover, as has been previously explained to the proponent of this interrogatory in response to discovery in at least one previous docket, the Postal Service does not routinely preserve a record or list of service standard changes after making the changes to the database underlying the CD-ROM filed in USPS Library Reference N2006-1. The database underlying the CD-ROM issued each quarter is overridden from quarter to quarter. Nor does the Postal Service maintain an organized compilation or library of the CD-ROMs and diskettes issued over the past 60 fiscal quarters.

#### DBP/USPS-6

This interrogatory also requests an examination of matters that are irrelevant to and beyond the scope of this proceeding. It seeks to explore an isolated, localized service issue, not a matter relating to service on at least a “substantially nationwide” basis, within the meaning of 39 U.S.C. § 3661. The instant request seeks an advisory opinion from the Commission regarding whether it would conform to the policies of the Postal Reorganization Act for the Postal Service, leaving current service standard definitions constant, to make adjustments in their application, on a potentially

nationwide basis, in pursuit of the network realignment objectives of its Evolutionary Network Development strategy, as outlined by witnesses Shah (USPS-T-1) and Williams (USPS-T-2).

It is patently immaterial to the issues raised by this request and the advisory opinion that the Commission is being asked to provide, which SCFs or 3-digit ZIP Code destinations have a dock-to-dock transit time of three hours or less from the North New Jersey Metro P&DC in Teterboro NJ. Likewise, it is immaterial and irrelevant to the issues raised by the request in this proceeding which destinating 3-digit ZIP Code areas receive at least 1.5 percent of the First-Class Mail that originates from the Northern New Jersey P&DC. the current First-Class Mail overnight service definitions were implemented after Docket No. N89-1 in 1990-91. The overnight First-Class Mail service standard definition reviewed by the Commission in Docket No. N89-1 was applied to the Northern New Jersey P&DC in 1990-91. See Docket No. C2001-3, Declaration of Charles M. Gannon at ¶4 (July 30, 2001).

The purpose of the instant docket is not to conduct a review of a 15-year-old decision implementing the current overnight First-Class Mail service standard definition to a particular facility, but to explore the question of whether – going forward – implementation of potentially substantially nationwide service changes resulting from pursuit of the objectives of Evolutionary Network Development would conform to the policies of the Act.

The filing of the Docket No. N2006-1 request may trigger the curiosity and nostalgia of those who wish to know more about specific, localized service standard

implementation decisions made 15 years ago, but those decisions are immaterial to the questions raised by the request in the current docket. Accordingly, the Postal Service objects.

DBP/USPS-18

This interrogatory requests a list of all mail processing facilities that have been closed or consolidated since the issuance of the Postal Rate Commission's Docket No. N89-1 advisory opinion. The Postal Service objects on the grounds of relevance. The request in this proceeding seeks an advisory opinion on the question of whether – going forward -- service changes resulting from pursuit of the objectives of Evolutionary Network Development would conform to the policies of the Act. The baseline for the instant inquiry is the current postal mail processing network. A comprehensive examination of which operations, for whatever reason, may have shifted from one facility to another over the past 15 years is immaterial to the issues raised by the request in this proceeding.

DBP/USPS-19

The Postal Service objects to this interrogatory, to the extent that it seeks information immaterial to the request in this docket. For instance, the interrogatory seeks a list of the specific dates on which the Postal Service commenced each of the currently pending 41 local Area Mail Processing (AMP) studies listed in the Attachment to USPS-T-2. It also seeks to a brief description of the consolidation action and the current status of these actions.

It is immaterial to this proceeding whether any of these specific studies was

initiated, for instance, on October 1, 2005, or October 15, 2005, or November 1, 2005. Accordingly, the Postal Service objects to the portion of this interrogatory requesting a list of study start dates. Otherwise, to the extent that the interrogatory seeks a description of what specific operational changes are being proposed or considered, the Postal Service objects on the grounds that it should not be required to reveal pre-decisional analyses and deliberations regarding currently pending AMP studies. The studies are ongoing. The studies will produce outcomes. Those outcomes will be made public. Meanwhile, the Postal Service reserves the right to protect its internal deliberative processes from unwarranted intrusion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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