

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 INTERROGATORY DBP/USPS-30
(March 1, 2006)

The United States Postal Service hereby objects to the following interrogatory of David Popkin, filed on February 27, 2006: DBP/USPS-30.

This interrogatory requests that the Postal Service provide any data reflecting days-to-delivery for all Standard Mail, Periodicals and Package Services mail that either originates in, destines in, or both originates and destines in Alaska, Hawaii, or other offshore United States locations. The Postal Service regards this interrogatory as requesting data that are not only irrelevant to the issues raised by its request in this proceeding, but also privileged. Accordingly, the Postal Service objects.

The request in this proceeding seeks an advisory opinion from the Commission on whether the Postal Service's consolidation of mail processing operations in pursuit of its Evolutionary Network Development strategy will result in changes in the application of existing service standard definitions to 3-digit ZIP Code pairs on a substantially national basis that conform to the policies of the Postal Reorganization Act. The intra-Puerto Rican or intra-Hawaiian Parcel Post mail streams are no less important to the Postal Service than, for example, intra-Washington DC Parcel Post. However, there are no issues raised by the request in this proceeding to which current transit time data

pertinent to any particular 3-digit ZIP Code, much less the remote ZIP Codes identified by Mr. Popkin, will have any relevance or material bearing. Mr. Popkin may have an interest in transit time for Standard Mail to, from and within Guam. It is appropriate, within the context of this proceeding, for parties to seek to determine what service standards apply to specific ZIP Code pairs and how they might change. However, the transit times for mail going between specific 3-digit ZIP Codes are irrelevant to the question of whether it would conform to the policies of the Act for the Postal Service to consolidate operations in a manner that results in changes in the application of current service standards definitions to 3-digit ZIP Code pairs on a potentially nationwide basis.

Moreover, the Postal Service regards time-in-transit data disaggregated below the national level for mail classes such as those identified in this interrogatory to be commercially sensitive and privileged. Such disaggregated ZIP Code-specific data are routinely withheld from disclosure by the Postal Service, as a matter of policy, under the terms of 39 U.S.C. § 410(c)(2). Accordingly, to the extent that any such data exist, the Postal Service should not be required to disclose them in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1134
(202) 268-2998; Fax -5402
March 1, 2006