

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 CARLSON INTERROGATORIES DFC/USPS-1 AND 3  
(April 13, 2006)

The United States Postal Service hereby submits its objections to the following interrogatories of Douglas Carlson, filed on April 6, 2006: DFC/USPS-1 and 3. Both interrogatories seek detailed postal minutiae of interest to the requester, but which has no material bearing on or relevance to the issues raised by the request in this docket.

The Postal Service has requested an advisory opinion on whether potentially nationwide changes in service standards to numerous ZIP Code pairs – resulting from a systemwide realignment of its mail processing network – would conform to the policies of the Postal Reorganization Act. It should be emphasized that such matters as collection box pick-up time changes are not an element of the realignment plan. Nevertheless, the Postal Service's April 10<sup>th</sup> response to interrogatory OCA/USPS-20(b)(iv)(1) and its April 4<sup>th</sup> Response to NOI No. 1, at page 23, fn. 1, acknowledge that implementation of network realignment decisions could involve localized consideration of changes to final pick-up times for some collection boxes in service areas for which originating operations are being shifted to a different mail processing facility.

The Postal Service considers that data reflecting the number of affected collection boxes, the general nature of the pick-up time changes, and the 3-digit ZIP

Code area in which they are located, as reflected in the response to OCA/USPS-20(b)(iv)(1), are sufficient for purposes of addressing issues that are either raised by or tangential to the request in this proceeding. Accordingly, it has provided such data for the record, as it relates to the AMP decisions in USPS Library Reference N2006-1/5.

However, determining whether the service standard changes resulting from network realignment are substantially nationwide in scope and conform to the policies of the Postal Reorganization Act will not be affected by disclosure of the information sought by DFC/USPS-1 for each collection box which experiences a last pick-up time change, such as: (a) the average weekly volume, (b) the date that such volume data were collected, (c) the box location ID number, or (d) the box address. It also is not necessary to the resolution of any material issue in this proceeding that the Postal Service provide the same four data elements for each collection box that experiences a change in final collection pick-up time in any 3-digit ZIP Code area, plus (e) a description of the box address, (f) its city and state, (g) the mail class it serves, (h) the type of collection box it is, (i) the area the box is in, (j) its final weekday collection time and (k) its final Saturday collection time, as requested by DFC/USPS-3.

The requester has a well-documented interest in postal collection boxes. To the extent that there is an intersection between the material issues in this docket and collection box operations, reasonable discovery is appropriate. However, discovery should not be permitted to the level sought here. These interrogatories seek to quench a thirst for collection box data well beyond that which is necessary and relevant to the issues in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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