

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-6 AND 8 THROUGH 10
(May 8, 2006)

The United States Postal Service hereby submits its objections to the following interrogatories of Douglas Carlson, filed on May 1, 2006: DFC/USPS-6 and 8 through 10.

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 or Saturday mail processing consolidation are not an element of the realignment plan. Accordingly, the Postal Service files these objections.

DFC/SUSP-6

Among the 10 consolidation packages in USPS Library Reference N200-1/5, the Olympia WA AMP reflects plans to adjust collection box last pickup times in the 985 3-digit ZIP Code area. In its April 24th response to DFC/USPS-2, the Postal Service explains that, among 420 collection boxes, there are 738 weekday and weekend *last pickup* times. And, that 20 of these last pickup times are moving from at or after

5:00pm to a time at or after 4:00pm.

This interrogatory identifies three 3-digit ZIP Code areas in the Olympia WA area and requests that the Postal Service identify the location ID number, address, city and average weekday volume of mail collected for any box for which a last pickup time has been moved from 5:00pm or later to a time earlier than 5:00pm. The Postal Service objects to this interrogatory. It seeks localized minutiae that are irrelevant to the issues of national policy raised by the request in this proceeding. The locations of these 20 collection boxes and their average weekday volumes have no bearing on the question of whether realignment of the mail processing network to achieve the goals of Evolutionary Network Development are consistent with the policies of the Postal Reorganization Act, within the meaning of § 3661. 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 DFC/USPS-2, are sufficient for purposes of addressing issues that are either raised by or tangential to the request in this proceeding.

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-6. The requester has a very intense, 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.

DFC/USPS-8 and 9

These interrogatories are objectionable because they seek information that is patently irrelevant to the issues raised by the request in this proceeding. The questions seek an explanation of collection box last pickup time changes in one 3-digit ZIP Code area in California believed to have been made in either 2001 or 2002, in connection with a purported transfer of some mail processing operations from the Salinas CA P&DF to the San Jose P&DC.

The Postal Service has requested an advisory opinion on whether potentially nationwide changes in service standards to numerous ZIP Code pairs – resulting from an upcoming systemwide realignment of its mail processing network – would conform to the policies of the Postal Reorganization Act. The date on which some operation in Salinas may have been moved to San Jose four or five years ago has no bearing on whether pursuit of the objectives of Evolutionary Network Development in 2006 and going forward would conform to the policies of the Postal Reorganization Act.

The discussion of current collection box last pickup time changes in Olympia WA, in the context of Evolutionary Network Development in the instant docket may spark nostalgia in some about an isolated collection box last pickup time change that may have occurred five years ago in some unrelated instance. However, that does not provide a basis for using discovery in the current docket for purposes of seeking information about some unrelated, isolated, localized change that may have occurred back then.

DFC/USPS-10

This interrogatory requests a list of all mail processing facilities that process originating mail on weekdays, but not Saturdays. The question then proceeds to request the identities of facilities that perform Saturday processing for mail originating in the service areas of the former facilities.

Local consolidations of Saturday mail processing are not an uncommon practice and are not subject to Headquarters review or approval. Headquarters does not maintain a centralized, updated listing of where Saturday consolidations may be in place. The locations of Saturday consolidations is not known to or taken into account by Headquarters personnel responsible for the centralized establishment of service standards or in the implementation of changes in those service standards. The phenomenon of Saturday originating mail processing consolidations has no bearing on the question of whether it would conform to the policies of the Postal Reorganization Act for the Postal Service, moving forward, to make service standard changes as a result of consolidations implemented in pursuit of the network realignment objectives of Evolutionary Network Development. Accordingly, the locations of any Saturday consolidations are irrelevant to the issues raised by the request in this proceeding. Moreover, it would be unduly burdensome for the Postal Service to conduct a field survey for purposes of this proceeding to identify all locations where Saturday consolidations may be in place.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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