

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-85(b), 87 AND 88
(May 18, 2006)

The United States Postal Service hereby objects to the following interrogatories of David Popkin, filed on May 11, 2006: DBP/USPS-85, 87 and 88.

DBP/USPS-85(b)

This interrogatory seeks a level of operational minutiae that is unnecessary to a determination of whether it would be consistent with the policies of the Postal Reorganization Act for the Postal Service, in pursuit of the objectives of Evolutionary Network Development, to implement service standard upgrades on a substantially nationwide basis. In response to discovery, the Postal Service been forthcoming in indicating that certain Area Mail Processing operational consolidations may result in some local changes to the last pickup times for some collection boxes within the service area of some mail processing plants. The Postal Service has even gone so far as to indicate the number of affected boxes for each AMP and to generally describe the nature of the changes in final collection box pickup times. However, it is unnecessary to a resolution of the issues raised by the request in this proceeding to examine such trivial levels of detail as changes in the time of dispatch of mail from any post office to any

mail processing plant based on whether a collection box last pickup time for any box in the service area of that post office changed from 5:00 pm to 4:00pm.

DBP/USPS-87

This question seeks to determine what current overnight First-Class Mail service standards might be if, in 1990-91, when implementing the first phase of service standard changes reviewed in Docket No. N89-1, the Postal Service had treated certain discretionary criteria in the overnight definition as mandatory. The Postal Service objects to this interrogatory, to the extent that it is based on an expectation that it should conduct a systemwide analysis to develop the requested information. The Postal Service considers such an exercise to be irrelevant to the issues raised by the request in the instant docket. Those issues relate to whether, going forward, the pursuit of Evolutionary Network Development would result in service standard changes that are consistent with the policies of the Postal Reorganization Act. Determining the extent to which current overnight service standards zones might be different under some hypothetical scenario is an interesting, but irrelevant, intellectual exercise with which the Postal Service should not be burdened for purposes of the current docket. Moreover, to the extent that it seeks a systemwide replication of the task undertaken to respond to DBP/USPS-6 for one mail processing plant, DBP/USPS-85 seeks to impose upon the Postal Service the chore of generating the origin-destination volume data for each facility pair and then repeating 450 times what took three hours of research and analysis to do for one mail processing plant. Such an undertaking would be unduly burdensome. Otherwise, in the absence of such a study, the Postal Service objects to the

interrogatory, to the extent that it seeks a speculative guess devoid of all empirical foundation.

DBP/USPS-88

The Postal Service objects to this interrogatory as indecipherable. It appears to be founded on a presumption that a quantifiable response to DBP/USPS-87 can be offered, and asks for a comparison of that response to the last two sentences of the combined response to subparts (e) and (f) of DBP/USPS-73. That portion of the combined response pertains to potential Service Standards CD-ROM database errors. A response to DBP/USPS-87 would pertain to a hypothetical set of service standards. DBP/USPS88 appears to seek a comparison of the magnitude of database errors referenced in response to DBP/USPS-73(e&f), to the magnitude of hypothetical changes in service standards sought in DBP/USPS-87, and to the magnitude of exceptions in the application of the service standard definitions discussed in response to DBP/USPS-73. Or, so it would seem. In any event, it certainly is not clear. Such an apples-to-oranges-to-pears comparison would involve three phenomena, the magnitude of two of which are unknown and unduly burdensome to quantify, assuming the Postal Service is on the right track in understanding what the question seeks. But, the Postal Service is not certain what the question is trying to ask.

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
May 18, 2006