

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON (DFC/USPS-75)  
(August 16, 2006)

The United States Postal Service hereby provides its response to the following interrogatory of Douglas Carlson, filed on August 2, 2006: DFC/USPS-75.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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August 16, 2006

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**DFC/USPS-75.** Please refer to the response to DBP/USPS-91.

a. Please confirm that the primary condition described in the response to DBP/USPS-91(b) that might permit POM section 313.1 to take precedence over other requirements in sections 316 to 321 is the distance of the post office from the processing plant or facility. If you do not confirm, please explain.

b. Please describe conditions other than distance from the processing plant or facility that might permit POM section 313.1 to take precedence over other requirements in POM sections 316 to 321.

c. When the processing plant or facility is located a normal distance (e.g., a driving time during relevant hours of 90 minutes or less) from the post office, may local postal officials determine that POM section 313.1 takes precedence over other requirements for collection services specified in POM sections 316 to 321? If the answer is not an unqualified no, please explain, and please provide an approximate distance or driving time between the post office and the processing plant or facility that would allow the answer to be an unqualified no.

**RESPONSE:**

The response to DBP/USPS-91 discussed the application of the guidance in the POM, and noted that in certain cases, local circumstances may justify an exception to certain sections of the POM instructions. It is not possible to anticipate or document all possible circumstances (or combinations of circumstances) that could justify an exception. To respond to the request in DBP/USPS-91, the example of a post office several hours from the processing plant was provided. Also, the original interrogatory and the response to DBP/USPS-91 dealt with POM sections 313, and 321 through 326, not sections 316 to 321. The response to this follow-up therefore refers to POM sections "321 through 326" instead of sections "316 to 321."

a. Not confirmed. No specific factor would be established as the "primary condition" in determining if an exception to POM instructions was justified. Each case would be considered based on the circumstances involved.

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b. It is not possible to anticipate or document all conditions that might affect the ability of a post office to meet the conditions under POM 313.1, and which might require an exception to POM 321 through 326. The response to DBP/USPS-91 provided one example of circumstances that would justify an exception to POM 321 through 326, in response to the request for discussion on this issue.

c. See the response to “a” above.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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