

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
DOUGLAS F. CARLSON INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS DEAN J. GRANHOLM (DFC/USPS-T3-4, 6-7)
(April 12, 2010)

In accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service hereby files the following objections to the above-listed interrogatories submitted by Douglas Carlson on April 1, 2010. Each interrogatory is reprinted below, with the reasons for objecting following.

DFC/USPS-T3-4. Please discuss the extent to which collection boxes located under the jurisdiction of city-delivery offices that qualify for a weekday collection time at 5:00 PM or later pursuant to POM § 322.1 do, in fact, have a final collection time on weekdays at 5:00 PM or later. Please explain in detail the basis for your response.

The Postal Service objects to this interrogatory because it is irrelevant to the issues raised by the request in this docket. This docket concerns a Postal Service plan to eliminate or reduce certain operations, including collections from collection boxes along delivery routes on Saturdays. The Postal Service plan does not focus on, nor will its results affect, the collection of mail from collection boxes on weekdays. It is not readily apparent how providing the data requested by this interrogatory is relevant to the proposal concerning Saturday service.

In addition, the Postal Service objects to providing a response to this

interrogatory because doing so would impose an undue burden on the Postal Service's limited resources. With its response to DFC/USPS-1, which will be filed later this week, the Postal Service will provide the requester with any raw data which he might be able to utilize to answer this interrogatory, assuming it can be answered. For Postal Service personnel to attempt this analysis in his stead, however, would unduly strain already limited resources, given the size of the data, the nature of the analytical tasks involved, and the competing demands on relevant resources of day-to-day functions.

The promptness and diligence with which the Postal Service will provide the data requested in interrogatory DFC/USPS-1 should not obscure the fact that doing so involves significant and expensive resources, such as mainframe usage and information technology specialist time, and distracts from the ordinary use of such resources.

DFC/USPS-T3-6. Please identify the post offices that have collection boxes in residential areas that do not have a Saturday collection scheduled for each box that is accessible to the public on Saturdays. For each post office in your response, please provide the number of collection boxes in residential areas that do not have a Saturday collection scheduled for each box that is accessible to the public on Saturdays.

The Postal Service objects to providing a response to this interrogatory because doing so would impose an undue burden on the Postal Service's limited resources. With its response to DFC/USPS-1, which will be filed later this week, the Postal Service will provide the requester with the raw data which he can utilize to perform this analysis, or analyze in any manner that he believes to be instructive. For Postal Service personnel to do this analysis in his stead, however, would unduly strain already limited resources, given the size of the data, the nature of the analytical tasks involved, and the competing demands on relevant resources of day-to-day functions.

The promptness and diligence with which the Postal Service will provide the data requested in interrogatory DFC/USPS-1 should not obscure the fact that doing so involves significant and expensive resources, such as mainframe usage and information technology specialist time, and distracts from the ordinary use of such resources.

DFC/USPS-T3-7. Please identify the post offices that have collection boxes in “business areas,” as the Postal Service defines this term, that qualify as a “time-decal” box pursuant to POM § 322.1 and that do not have a Saturday collection scheduled for each box. For each post office in your response, please provide the number of “time-decal” collection boxes that do not have a Saturday collection scheduled.

The Postal Service objects to providing a response to this interrogatory because doing so would impose an undue burden on the Postal Service’s limited resources. With its response to DFC/USPS-1, which will be filed later this week, the Postal Service will provide the requester with the raw data which he can utilize to perform this analysis, or analyze in any manner that he believes to be instructive. For Postal Service personnel to do this analysis in his stead, however, would unduly strain already limited resources, given the size of the data, the nature of the analytical tasks involved, and the competing demands on relevant resources of day-to-day functions.

The promptness and diligence with which the Postal Service will provide the data requested in interrogatory DFC/USPS-1 should not obscure the fact that doing so involves significant and expensive resources, such as mainframe usage and information technology specialist time, and distracts from the ordinary use of such resources.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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