

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 CARLSON INTERROGATORIES DFC/USPS-2-5
(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, and, in revised form, on April 5, 2010. Each interrogatory is reprinted below, with the reasons for objecting following.

DFC/USPS-2.

- a. Of all collection boxes that have at least one collection scheduled on weekdays, please provide the percentage that have final collection times during the following time intervals: Before noon; Noon to 12:59 PM; 1:00 PM to 1:59 PM; 2:00 PM to 2:59 PM; 3:00 PM to 3:59 PM; 4:00 PM to 4:59 PM; 5:00 PM to 5:59 PM; and 6:00 PM to 11:59 PM. Within each category, please identify the percentage of boxes that are located at postal facilities.
- b. Please provide the same information requested in part (a) but for locations, not boxes; thus, a location with more than one box should be counted once, as one location.

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 detailed breakdowns of collection box data concerning weekday collections will illuminate the proposal concerning Saturday service.

The Postal Service also objects to this interrogatory because it is unduly burdensome, for the same reasons discussed below in connection with interrogatories DFC/USPS-3 through 5.

DFC/USPS-3.

- a. Of all collection boxes that have at least one collection scheduled on Saturdays, please provide the percentage that have final collection times during the following time intervals: Before noon; Noon to 12:59 PM; 1:00 PM to 1:59 PM; 2:00 PM to 2:59 PM; 3:00 PM to 3:59 PM; 4:00 PM to 4:59 PM; 5:00 PM to 5:59 PM; and 6:00 PM to 11:59 PM. Within each category, please identify the percentage of boxes that are located at postal facilities.
- b. Please provide the same information requested in part (a) but for locations, not boxes; thus, a location with more than one box should be counted once, as one location.

DFC/USPS-4. Please provide the percentage of collection boxes that have at least one collection scheduled on weekdays but no collection scheduled on Saturdays.

DFC/USPS-5. For collection boxes that have at least one collection scheduled on weekdays but no collection scheduled on Saturdays, please provide a separate breakdown of the percentage of such boxes by each attribute in the Collection Point Management System (CPMS) "location type" field, by each attribute in the CPMS "box type" field, and by each attribute in the CPMS "box location description" field.

The Postal Service objects to providing a response to these interrogatories because doing so would impose an undue burden on the Postal Service's limited resources. The promptness and diligence with which the Postal Service has been able to assemble the data requested in interrogatory DFC/USPS-1, which the Postal Service will file in a library reference later this week, 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. With its response to DFC/USPS-1, the Postal Service will be providing the requester with the complete data, which he can 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.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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