

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

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

Docket No. N2010-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES DFC/USPS-T4-22 to 24
(May 14, 2010)

The United States Postal Service hereby files this objection to the above-identified interrogatories of Douglas Carlson dated May 4, 2010. The interrogatories are repeated below and followed by a statement of the basis for the objection.

DFC/USPS-T4-22

Please provide the number of AFCS machines at each facility that cancels and processes outgoing mail.

DFC/USPS-T4-23

For each facility that cancels and processes outgoing mail on Saturdays, please provide the percentage of the AFCS cancellation volume at that facility on an average weekday that that facility's AFCS machines cancel on an average Saturday. For example, if the cancellation volume on an average weekday is 1 million pieces, and if the cancellation volume on an average Saturday is 600,000 pieces, the answer to the interrogatory would be 60 percent.

DFC/USPS-T4-24

For each facility that cancels and processes outgoing mail on Saturdays, please express the AFCS cancellation volume at that facility on an average Saturday as a percentage of AFCS cancellation capacity at that facility. With reference to appropriate Postal Service productivity benchmarks, please determine a reasonable measure of AFCS cancellation capacity and explain the measure you selected.

The information sought by the interrogatories is irrelevant to the Postal Service request at issue in this docket. The information would be irrelevant even in an aggregate state, but it is exceptionally irrelevant in the disaggregated state requested by

Mr. Carlson. This docket concerns the Postal Service's request for an advisory opinion from the Commission on planned nationwide service changes that affect the delivery of mail to street addresses and the outgoing processing of mail on Saturdays. It does not concern intervenors' general curiosity about Postal Service machinery or intervenors' personal proposals for saving the Postal Service money. Accordingly, the Postal Service objects to providing the information sought by the interrogatories.

Nevertheless, in regard to interrogatory DFC/USPS-T4-22, the Postal Service will provide a response with the aggregate number of AFCS machines nationwide. Further, in regard to interrogatory DFC/USPS-T4-23, the Postal Service points Mr. Carlson to its responses to DFC/USPS-T4-8 and DFC/USPS-T4-16. In its response to DFC/USPS-T4-8, the Postal Service stated that approximately 8 percent of weekly originating outgoing volume is processed on Saturdays. In its response to DFC/USPS-T4-16, the Postal Service stated that the average Saturday is estimated to experience 43.8 percent of the average weekday outgoing operations volume.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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