

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 APWU INTERROGATORY APWU/USPS-T2-7 TO WITNESS CORBETT
(June 7, 2010)

The United States Postal Service hereby objects to APWU/USPS-T2-7 on the grounds of burden and relevance. The interrogatory, filed on May 28, 2010, reads as follows:

APWU/USPS-T2-7. On page 11 you state that the average number of pieces per delivery point per day was right around 5 pieces in 2000 and that by 2009 that number had dropped to slightly below 4. For those two years and 2006 (the year of peak mail volume) please provide a more detailed breakdown of the number of deliveries per delivery point by routes. Specifically:

- a). What is the distribution of the average number of pieces per delivery point by routes?
- b). What types of routes show above average pieces per day?
 1. By income
 2. By geographic region
 3. By rural/urban
 4. By business/residential
- c). What types of routes show below average pieces per day?
 1. By income
 2. By geographic region
 3. By rural/urban
 4. By business/residential

Initially, the Postal Service was uncertain what was being requested in this question. After informal consultation with APWU representatives, the Postal Service now understands that the question seeks information on average pieces per delivery point per day, for the years 2000, 2006, and 2009, for each delivery route in the country.

In other words, instead of a calculation (such as that reflected in the cited testimony of witness Corbett) which includes national volume in the numerator and national delivery points in the denominator, to answer this question would require a series of calculations which include volume for each particular carrier route in the numerator and the number of delivery points for that same route in the denominator. Broadly speaking, there are currently about 150,000 city delivery routes, and 70,000 rural routes. Once those calculations were completed, part a. of the question seeks distribution information. Again based on informal discussions, the Postal Service understands that what is sought in part a. would be something along the lines of, if the national average was 4 pieces per day, what percentage of routes were 2 pieces, what percentage of routes were 3 pieces, what percentage 4 pieces, what percentage 5 pieces, etc. Parts b.-c. then seek demographic information regarding routes that were above or below the average.

The Postal Service has not done any calculations of average volume per delivery point per delivery day on a route basis, across all routes. Perhaps more importantly, the Postal Service does not have the raw data necessary to do these calculations in any format in which the data could quickly be aggregated and analyzed. In some instances, the data do not exist, particularly for the earlier years. For example, the Postal Service does not have daily volume (or total annual volume) for every rural route for these years, and does not have a reliable measure of daily volume (or total annual volume) for every city route for 2000. Of course, the calculations requested also require that, even if the volumes could be identified, the number of delivery points for each route would also have to be available in a format that could be reliably matched with the volumes for

the same route. Volumes and delivery points are not found in the same data base. Therefore, experience shows that a great deal of time and effort would be required to ensure that volume data and delivery point data were actually matched correctly. That would be a substantial undertaking, even if the city and rural route structures had been static both within and between years. But, in fact, the number of routes changes both within and between years, and the number of delivery points (even for routes that existed relatively intact between 2000 and 2009) changes both within and between years. Some mechanism would need to be devised to deal with these changes, and any such mechanism would involve a substantial amount of time and effort.¹

Of course, the above discussion focuses just on the initial calculations. The analysis required to respond to parts b.-c., however, would extend well beyond that, and would require tapping into data sources (e.g., income) beyond anything that normally resides in the Postal Service's operating data systems. Once again, if data are being pulled in from another data source, and we are talking about hundreds of thousands of records, the issue of correctly matching inputs becomes substantial. What might be involved in responding to other aspects of parts b.-c. is uncertain, but due to the large number of observations, any analysis would require careful planning, execution, and review.

¹ Because of the large number of routes, even calculating the simple averages would be a challenge. For example, if DOIS data were to be used to find these averages, calculating them for one year would require extracting over 45 million records (150,000 times 300), somehow transferring them to a medium that would permit exchange of files, and then find software that can effectively handle such a large database on a personal computer. While this is certainly feasible, it is difficult, expensive and time consuming.

Basically, the APWU is requesting initiation of a major research project that the Postal Service has not undertaken, and has no need to undertake. While it is difficult to estimate the resources that such an uncharted endeavor would consume, suffice to say that it would likely take at least hundreds of workhours, months of calendar time, and perhaps thousands of dollars of expenses to obtain access to outside databases, to attempt to perform such a series of analyses correctly. On the other hand, given the unavailability of certain key inputs, it is unclear exactly how much progress could be made no matter what resources were dedicated to the effort. Clearly, the burden involved in any attempt along these lines would be undue.

That is particularly the case given the dubious relevance of any results. Even hypothetically assuming for purposes of discussion, for example, that the Postal Service were able, after great effort, to come up with some estimate of the distribution of the average pieces per delivery point per day for city delivery routes around the mean delivery point per day for city delivery routes, for the years 2000, 2006, and 2009, exactly what use could be made of this information? To be totally clear, the pieces per delivery point per day metric discussed in the testimony of witness Corbett plays no role whatsoever in the Postal Service's estimate of cost savings available from shift to a 5-day environment. The trend in the aggregate metric was provided to graphically illustrate the growing costs of delivery, given the decline in volumes and the growth in delivery points. Disaggregated data would not achieve this objective. In the abstract, the questions posed in APWU 7 may seem relevant to this proceeding, but at a practical level, that is not the case.

Following informal discussions with APWU representatives, the Postal Service has devoted some effort to examine the possibility of providing some or all of the analysis requested with a reasonable amount of effort. No such possibility was identified. Therefore, the Postal Service objects to APWU/USPS-T2-7 on the grounds of undue burden and relevance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

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.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX: -5402
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