

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

OBJECTON OF THE UNITED STATES POSTAL SERVICE
TO GCA INTERROGATORY GCA/USPS-T6-6 TO WITNESS BRADLEY
(June 18, 2010)

The United States Postal Service hereby objects to the following interrogatory of GCA, filed on June 8, 2010: GCA/USPS-T6-6.

The interrogatory GCA/USPS-T6-6 reads as follows:

GCA/USPS-T6-6.

- a. Please provide a copy of all DOIS data for FY2009.
- b. Please provide a copy of all information used to construct that data, for example operations manuals used in constructing the data or that explain how the data base is constructed, questionnaires, etc.

The Postal Service objects primarily on the grounds of burden, but there are potential relevance and privilege implications as well.

The fundamental problem seems to be a lack of appreciation for the monumental scope of what the question encompasses. The question also seems to miss the point that DOIS (which stands for Delivery Operations Information System) is a complex ongoing data system, not a simple, static database. Some basic contours of DOIS were presented in response to OCA/USPS-141 and 142, filed on June 24, 2005, in Docket No. R2005-1. That response noted that:

DOIS is a Business Solution System that consists of a number of different applications including a database. Each application has different software. The software includes Visual Basic, COBOL, and DBII.

Moreover, the DOIS has evolved since that time and has become more sophisticated, with some reporting moved from the client software to web-based reporting.¹ With these changes, the underlying data DOIS uses now consist of over 500 tables and over 4300 columns. While its total size has not been measured recently, even some years back, the size of the data contained in the system was over 6 terabytes, which is over 6,000,000 megabytes. The DOIS adds over 3,000,000 rows in clock rings and 1,500,000 rows in scans daily, so to provide all of the DOIS data even for a single fiscal year would mean supplying multiple billions of rows of data to start. Moreover, there would be a major burden required to format and store the data in a human-readable format.

Then there is the matter of the actual data extraction. Because it is an ongoing data system, the DOIS is designed to permit users to extract the parts of the collected data that are usefully for their needs. Extracting all of the data at once has never been done, and doing so would place such demands on that system that it would impede the ability of regular users to carry out their necessary daily functions. Even if that impact to performance were ignored, it would take several weeks just to extract the data, and a greater number of weeks to consolidate and format it, which is required to convert the information from its native format into something usable for analytic purposes. The

¹ Thus, there are no manuals, *per se*, for DOIS. Rather, the available information is essentially web-based as well.

burden of providing the material requested dwarves anything remotely commensurate to the possible purposes for this proceeding.

Another consideration is that there are employee Identifiers that the system uses internally, but does not display (such as SSN) which raises issues of privilege. In addition, even within the Postal Service, the data bases relating to DOIS are restricted to certain users, who must have a special ID and password to obtain access, The concerns that motivate this level of protection would have to addressed. Thus, many issues of privilege would need to be sorted out before preparations for data extraction could even begin.

The Postal Service has used a small extract from the DOIS for FY2009 in this proceeding, which perhaps suggests that there may be some potential relevance for certain specific extracts from DOIS. And the Postal Service has already provided that data extract. But this does not in any way establish the relevance of all FY2009 DOIS data. GCA is clearly putting the cart before the horse by asking for all FY09 DOIS data. There is no realistic possibility of complying with this request in a fashion that is likely to provide usable data for this proceeding, and there is much information in DOIS that has nothing to do with the issues raised in this docket. The Postal Service objects on the grounds of undue burden, relevance, and privilege.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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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