

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

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO APWU MOTION TO COMPEL REGARDING APWU/USPS-T2-7
(June 28, 2010)

On June 7, 2010, the Postal Service objected 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

In a filing initiated on June 21 and posted on June 22, the APWU moved to compel. The Postal Service hereby responds to that motion to compel.

APWU argues that the subject matter of the inquiry is relevant. Motion to Compel at 2-3. The Postal Service does not necessarily agree with APWU's

assessment of the actual utility of the information APWU seeks to develop.

Nonetheless, in light of the burden identified by the Postal Service relating to the APWU question as filed, APWU has agreed to modify its question to pursue a different approach. APWU characterizes the expected burden associated with the new approach as substantially less than the burden the Postal Service has identified relating to the original approach, and the Postal Service agrees with this characterization.

Set forth as an attachment to this pleading is an extract from the Motion to Compel, which the Postal Service understands to be the new question to which APWU seeks a response. The Postal Service has consulted with APWU representatives informally to resolve uncertainty regarding exactly what information would be responsive to the new request. Based on those discussions, the Postal Service expects to be able to provide a response to the new question by the end of this week.

Because of the mutual effort of the parties to work through the issues raised by this matter, the Postal Service anticipates that there will be no need for the Presiding Officer to rule on the motion to compel, either at this time, or,

hopefully, any time later. Therefore, the Postal Service requests that the motion to compel be denied as moot.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX: -5402
June 28, 2010

Request in Lieu of APWU/USPS-T2-7. APWU is prepared to use data, like that provided in the City Carrier Cost System and Rural Carrier Cost System, already on the public record. However, this is sampling data. Therefore, in order to effectively use this information, APWU will need the following information:

- Basic control totals for the number and types of carrier route for the time period consistent with the City Carrier Cost data submitted with the R2001-1 and R2006-1 rate cases and for the ACR2007.
- ACR2008 and ACR2009 data (the latter are presumably FY2007, FY2008 and FY2009) please provide the count of city carrier routes in the City Master file for the same quarter of each of those time periods (only one quarter per year is needed but it should be the same quarter) that are in each block of the table below:

	CAG A-E Post Offices	CAG F-L Post Offices
Business Routes		
Residential Routes		
Mixed Routes		

Please use the definitions normally used to stratify these data for sampling.

- For the time period consistent with the Rural Carrier Cost data submitted with the R2001-1 and R2006-1 rate cases and for the ACR2007, ACR2008 and ACR2009 data, provide the count of rural carrier routes in the Rural Master file for the same quarter of each of those time periods (only one quarter per year is requested but please have it be the same quarter in each year and the same quarter for which the CCCS counts are provided) that are in each block of the table below:

	Districts with 20 or fewer rural routes	Districts with more than 20 rural routes
Rural routes		

- Also provide a total number of city carrier routes, the number of rural routes for each of these time periods. Please indicate if there are additional routes that would not fall under either group and describe those.

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

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