

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**PARTIAL OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON DFC/USPS-T13—1 TO 4
(March 5, 2012)**

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby partially objects to the following interrogatories, which were filed on February 24, 2012: DFC/USPS-T13-1, 2, 3, and 4.

DFC/USPS-T13-1

This interrogatory requests a description of efforts undertaken by the Postal Service "in the past 15 years to inform customers of the service standards that apply to individual pieces of First-Class Mail"

The Postal Service objects on the grounds of burden, overbreadth, and relevance. The fifteen year time period requested is excessive and requests documents that are well outside the scope of this matter. The enactment of the Postal Accountability and Enhancement Act of 2006 (PAEA) created a new model for classifying service standards and serves as a reasonable historical boundary for any relevant information relating to service standards. Accordingly, the Postal Service intends to respond by limiting its response to the time period since the enactment of the PAEA.

DFC/USPS-T13-2

This interrogatory requests an explanation and production of documents for the past 15 years relating to “encouraging, enticing, ‘upselling,’ or otherwise causing customers who appear at a retail service window to purchase Express Mail or Priority Mail”

The Postal Service objects on the grounds of burden, overbreadth, and relevance. As set forth above, the fifteen year time period requested is excessive and requests information and documents that are well outside the scope of this matter. Accordingly, the Postal Service will limit its response to the time period since the enactment of the PAEA.

Furthermore, the request for all documents that explain the Postal Service’s policies and practices is overbroad and unduly burdensome. The burden of compiling, organizing and analyzing responsive documents is incalculably overwhelming. Accordingly, the Postal Service intends to respond by limiting its document search to Postal Service policies and procedures only.

DFC/USPS-T13-3

This interrogatory requests a confirmation about Postal Service policies and practices in place for the past 15 years relating to encouraging “customers to use Express Mail or Priority Mail instead of First-Class Mail to send mail.”

The Postal Service objects on the grounds of burden, overbreadth, and relevance. As set forth above, the fifteen year time period requested is excessive and requests information that is well outside the scope of this matter. Accordingly, the Postal Service intends to respond by limiting its response to the time period since the enactment of the PAEA.

DFC/USPS-T13-4

This interrogatory requests that the Postal Service identify and provide documents for all advertising campaigns “undertaken in the past 15 years to encourage customers to use First-Class Mail or to inform customers of the service standards for First-Class Mail.”

The Postal Service objects on the grounds of burden, overbreadth, and relevance. As set forth above, the fifteen year time period requested is excessive and requests documents that are well outside the scope of this matter. Accordingly, the Postal Service intends to respond by limiting its response to the time period since the enactment of the PAEA.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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