

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

EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

Docket No. MC2005-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OCA/USPS-T3-20  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
(January 28, 2005)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby objects in part to interrogatory OCA/USPS-T3-20 of the Office of the Consumer Advocate, filed on January 18, 2005.

The interrogatory states:

OCA/USPS-T3-20. Please refer to the "Premium Forwarding Service Cost Analysis," appended to your testimony, at 2, n. 7. Note 7 cites LR-J-69 Table 5.2.1.1, Row 2, for the "Hours/Piece" to process Change-of-Address cards. In turn, note 4 of Table 5.2.1.1 references Handbook M-39, "Management of Delivery Services Handbook," for the 2 minutes to process Change-of-Address cards. Please provide a copy of the most recent version of Handbook M-39.

Handbook M-39, *Management of Delivery Services*, is a lengthy internal handbook that generally covers the administration of city delivery service, mail counts and route inspections, and procedures for tracking the number of routes and average daily workhour requirements for operation of city delivery service for each delivery unit.

The OCA's interrogatory does not provide the full citation to source information for the two-minute time. Footnote 4 of Table 5.2.1.1 in Library Reference J-69 states: "Carrier is allowed 2 minutes per piece. Refer to 'Management of Delivery Services

Handbook (M-39).’ Dtd. 1/30/81, Exh. 2-7, line 12.” Thus the time is sourced to a particular exhibit in Handbook M-39, not the entire handbook.

Witness Abdirahman plans to respond to interrogatory OCA/USPS-T3-20 by providing a brief excerpt from the current Handbook M-39 that shows the equivalent exhibit, which continues to reflect the time used in his cost analysis. This response will thus provide all material in Handbook M-39 pertinent to the two minute allowance, which is the only way this handbook is relevant to this case; it should accordingly satisfy any reasonable purpose for seeking documentation of the allowance. Providing the entire handbook would add extraneous material to the record.<sup>1</sup> The Postal Service therefore objects to this interrogatory in part, on the grounds of relevance and overbreadth.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

/s/

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<sup>1</sup> The OCA is fully capable of reviewing Handbook M-39 should it choose to do so. An older copy of M-39 was filed as part of USPS-LR-H-239/R97-1. The 1998 version of M-39 is available at <http://www.nalc.org/depart/cau/pdf/manuals/M-39/M39c2.pdf>. This latter version contains the same exact Exhibit 222.214a(4) on the same page (103) as the one currently in effect.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

/s/ \_\_\_\_\_  
David H. Rubin

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January 28, 2005