

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN  
(DBP/USPS-59(d))  
(June 20, 2006)

The United States Postal Service hereby objects to interrogatory DBP/USPS-59(d), filed on June 5, 2006, on the grounds of relevance, materiality and undue burden. Interrogatory DBP/USPS-59 contains many interwoven questions; because this objection extends semantically to DBP/USPS-59(f), the entire interrogatory is replicated below:

DBP/USPS-59.

- a. Please advise why presorted First-Class Mail is not measured by the EXFC program.
- b. Please advise and provide the reasons for all other categories of First-Class Mail that are not measured by the EXFC program.
- c. Please provide a breakdown of the total number of EXFC reporters utilized for the most recent available time for each of the following address categories:
  - [1] Residential City Delivery customer
  - [2] Business City Delivery customer
  - [3] Post Office Box customer
  - [4] General Delivery customer
  - [5] Rural Delivery customer
  - [6] Highway Contract Delivery customer
  - [7] Other [please specify]
- d. For the ZIP Codes that are included in each of the performance clusters that are part of the EXFC program, please provide the total number of delivery points in each of the seven categories shown in subpart c.
- e. Please provide a similar breakdown showing the number of mailpieces received by EXFC reporters during a reporting period in each of the seven categories shown in subpart c.
- f. Same as subpart d except provide the total number of mailpieces received by all addressees in each of the seven categories shown in subpart c.
- g. Please provide the level of confidence the data represents with the use of the number of reporters as shown in subpart c are utilized to measure the data for all of the potential addresses as shown in subpart d and the number of mailpieces shown in subpart e are utilized to measure the total mail volume shown in subpart f. Does the level of confidence change when the individual Performance Cluster data is evaluated? If so, please discuss and explain.

- h. Please provide similar information for the PETE program and the Express Mail program.
- i. Are the number of reporters utilized based on the number of potential addresses in an area or are the number of mailpieces tested based on the total number of mailpieces in the area or both? Please discuss the reasons.
- j. Please discuss the relative percentages of subpart c compared to subpart d and subpart e compared to subpart f as they are spread across the eighty-some Performance Clusters that are in the program. In other words, provide data that shows that all involved Performance Clusters are evaluated equally.
- k. Please discuss and explain any other criteria that are evaluated to ensure equal treatment between Performance Clusters, such as, whether the Performance Cluster does or does not make collections that comply with the Postal Operations Manual.

This interrogatory was filed as one question in a larger set, consisting of DBP/USPS-43-85. Answers to most of these interrogatories were filed June 19, 2006,<sup>1</sup> although responses to interrogatories numbered 45(a), 46(a), 47(a), 48(b), 52-53, 68, and 83 all indicated that supplemental responses will be filed after necessary research is completed. Interrogatory DBP/USPS-59 was deleted from the set, despite answers to some parts being available, because nuances in the questions went further than recognized initially. Part (d) of the interrogatory exemplifies this.

Development of a response to part (d) would require as much as several weeks work from a single, knowledgeable individual. Indeed, part (d) was analyzed by the group that is working to provide responses to POIR 4, questions 4-12.<sup>2</sup> Generation of a response to part (d) would require sortation of all addresses in all ZIP Code areas covered by EXFC and distinguished by the seven address types identified in interrogatory DBP/USPS-59(c). Given that there are 463 **3-digit** ZIP Code areas covered by EXFC,<sup>3</sup> it is clear that a great deal of time would be required to code and run the necessary queries. Further, given that EXFC ZIP Code areas cover 90 percent of originating First-Class Mail volume, and 80 percent of destinating First-Class Mail volume, most of the domestic service area would be involved.<sup>4</sup> Since nobody in the group could identify any reason why the 463 3-digit ZIP Code areas would vary in any systematic way from national figures, there is no reason to think that producing the

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<sup>1</sup> *Response of United States Postal Service Witness to Institutional Interrogatories from David Popkin DBP/USPS-43-58, 60-85.* The word "Witness" was an inadvertent inclusion in the document title.

<sup>2</sup> *See Status Report Of The United States Postal Service Regarding Responses To Items 4-12 Of POIR NO. 4* (June 9, 2006).

<sup>3</sup> Response to DBP/USPS-55 (June 19, 2006).

<sup>4</sup> *Id.*

material requested by Mr. Popkin would advance in any way the information available to the Commission for considering the Request.

Interrogatory part DBP/USPS-59(f) further requests analysis of the mail volume received by his seven types of delivery points in all EXFC ZIP Code areas. Again, such information would likely resemble data from the entire domestic service area. But since the Postal Service does not track mail by delivery points, it does not appear that development of an affirmative response would be possible. Were it possible to derive the requested estimates, the burden level would very likely exceed by several orders of magnitude the work necessary to develop a response to part (d) of question 59.

The Postal Service accordingly objects to interrogatory DBP/USPS-59(d) on the grounds that any response would be immaterial and irrelevant, while requiring a substantial burden to develop.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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