

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

REPLY OF THE UNITED STATES POSTAL SERVICE
TO MOTION TO COMPEL RESPONSES TO DFC/USPS-6, 8 AND 9
(May 30, 2006)

The United States Postal Service hereby submits its reply to the May 22, 2006, motion of Douglas Carlson seeking to compel responses to interrogatories DFC/USPS-6, 8 and 9. For the reasons explained below, one issue raised by the motion should be declared substantially moot and the remainder of the motion should be denied.

DFC/USPS-6

Among the 10 consolidation packages in USPS Library Reference N200-1/5, the Olympia WA AMP reflects plans to adjust collection box last pickup times in the 985 3-digit ZIP Code area. In its April 24th response to DFC/USPS-2, the Postal Service explains that, among 420 collection boxes, there are 738 weekday and weekend *last pickup* times. And, that 23 of these last pickup times are moving from at or after 5:00pm to a time before 5:00pm.

This interrogatory identifies three 3-digit ZIP Code areas in the Olympia WA area and requests that the Postal Service identify the location ID number, address, city and average weekday volume of mail collected for any box for which a last pickup time has been moved from 5:00pm or later to a time earlier than 5:00pm.

The Postal Service withdraws its objection insofar as it applies to the address,

city, and average weekday volumes for the boxes associated with the 23 last pickup time changes in the 985 ZIP Code. The Postal Service maintains, however, that it is immaterial to this docket what the location ID numbers for those boxes may be, and that any conclusion regarding those boxes as it pertains to the Postal Operations Manual can be derived without this last piece of minutiae.

As the only 3-digit ZIP Code area in which changes have been made in connection with the Olympia consolidation are in the 985 ZIP Code area, the Postal Service maintains that the request relating to others ZIP Codes (983 and 984) seeks information irrelevant to this docket. Accordingly, the response to the interrogatory should be limited to the 985 ZIP Code area.

DFC/USPS-8 and 9

These interrogatories seek an explanation of collection box last pickup time changes in one 3-digit ZIP Code area in California believed to have been made in either 2001 or 2002, in connection with a purported transfer of some mail processing operations from the Salinas CA P&DF to the San Jose CA P&DC.

At page 4 of his motion, Mr. Carlson argues that these interrogatories seek to “develop evidence of the apparent propensity for plant consolidations to trigger cutbacks in collection times in the service area of the surviving plant.” At page 5, he asserts that the interrogatories seek information that could lead to evidence that operational consolidations can cause changes in collection box last pickup times that may result in service that falls short of national service standards and statutory mandates below.

Whether operational consolidations arising from pursuit of the objectives of Evolutionary Network Development could lead to any material changes in collection box

pickup times is a topic relevant to the issues raised by the request in this proceeding. A party seeking to determine a nexus between END-related operational consolidations and the “propensity” of postal management to make collection box changes in conjunction with such consolidations might arguably justify a request for information related to recent operational consolidations that pre-date the initiation of the Evolutionary Network Development initiative. At pages 5-6 of his Motion, Mr. Carlson characterizes the Postal Service as having “disdain” for customers concerned about such potential changes. The record in this proceeding stands as stark evidence to the contrary. By providing relevant information responsive to the 11 operational consolidations reflected in USPS Library References N2006-1/5 and N2006-1/6, the Postal Service has generously accommodated the interests of those seeking to explore apparent “propensities” relating to collection box last pickup time changes as they may relate to operational consolidations. See the Postal Service’s responses to OCA/USPS-20(b)(iv) and DFC/USPS-2. However, Mr. Carlson fails to articulate any nexus between the information sought by DFC/USPS-8 and DFC/USPS-9 and the request currently pending before the Commission.

The rationale offered at page 5 of Mr. Carlson’s Motion eliminates any doubt that that the impetus for DFC/USPS-8 and DFC/USPS-9 is to use the current docket to explore a personal collection box issue related to a local operational change that apparently occurred in 2001 or 2002. If Exhibit 1 accompanying Mr. Carlson’s May 22nd Motion seems the least bit familiar, it is because the document was originally filed as Library Reference DFC-2 in Docket No. C2003-1, a complaint proceeding in which Mr. Carlson sought Commission review of collection box changes. In Docket No. C2003-1,

Mr. Carlson was afforded ample opportunity to explore matters raised by the contents of Library Reference DFC-2. The fact that an issue in that docket may not have been resolved to his satisfaction does not justify reviving it in the current docket. Using Mr. Carlson's "apparent propensity" rule, any isolated, localized 5 year-old change in the provision of any postal service at any post office that may have occurred in conjunction with any local operational consolidation is subject to examination in the current docket on the theory that it might reflect evidence of an "apparent propensity." By that standard, any alleged local service change that may have coincided with any previous operational change would be subject to discovery in the current docket.

The Postal Service has requested an advisory opinion on whether potentially nationwide changes in service standards to numerous ZIP Code pairs – resulting from an upcoming systemwide realignment of its mail processing network – would conform to the policies of the Postal Reorganization Act. The date on which some operation at the Salinas P&DF may have been moved to the San Jose P&DC four or five years ago has no bearing on whether pursuit of the objectives of Evolutionary Network Development in 2006 and going forward would conform to the policies of the Postal Reorganization Act. The fact that some collection box changes may have occurred five years ago in connection with an isolated operational consolidation at the Salinas P&DF sheds no more light on the "propensity" of END-related consolidations to result in such changes that the above-referenced information provided in relation to the eleven consolidations in USPS Library References N2006-1/5 and N2006-1/6. Viewed in the most favorable light possible, interrogatories DFC/USPS-8 and DFC/USPS-9 are unnecessarily cumulative; viewed in the most fair light possible, the interrogatories seek to revive

irrelevant issues raised in Docket No. C2003-1. Either way, the motion to compel responses to these interrogatories should be denied.

Respectfully submitted,

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