

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
DOUGLAS F. CARLSON INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JOSEPH E. NASH
(DFC/USPS-T16-2 and -4)
(June 12, 2006)

The United States Postal Service hereby objects to interrogatories DFC/USPS-T16-2 and -4, filed by Douglas F. Carlson on June 1, 2006. Each interrogatory is reprinted below, and is followed by the bases for these objections:

DFC/USPS-T16-2

This interrogatory reads as follows:

Please refer to your testimony at page 4, lines 11–12.

- a. Please explain the use of the air taxi to and from Billings, Montana, including the cities that the air taxi serves.
- b. Are air taxis used between other cities? If so, please identify them.

The information sought by this interrogatory -- not only a listing of the cities served by air taxi out of Billings, Montana, but a list all air taxis nationwide, is irrelevant to any of the rate or classification issues in this docket. In the referenced portion of his testimony, witness Nash merely mentioned "Air Taxi to/from Billings, MT," in his discussion of calculating Priority Mail air weight distributions for Commercial Air, as one of the items that are excluded from EDW operational Priority Mail air data. The actual uses of the air taxi are not implicated by his testimony.

Moreover, the Postal Service does not disclose this type of information -- describing specific routes where planes carry large parcels -- for security reasons. In addition, the Postal Service considers the information to be proprietary and commercially sensitive.

DFC/USPS-T16-4

This interrogatory reads as follows:

Please refer to your testimony at page 10, lines 6–17. Please provide a list showing the FedEx air facility that is mapped to each SCF.

Again, this information is irrelevant to any of the issues in this rate and classification proceeding. In his testimony, Witness Nash merely mentioned the connection between SCFs and FedEx air facilities in his discussion of distributing certain ground miles to Zones 5-8 because those ground miles are incurred in transporting mail to and from air facilities for a journey that results in Zones 5-8. The actual connections, themselves, are not related to his testimony.

Again, the Postal Service does not disclose this type of information -- concerning specific routes where planes carry large parcels -- for security reasons. Again, the Postal Service also considers the information to be proprietary and commercially sensitive. In addition, this information is considered confidential under the FedEx Transportation agreement. See Docket No. R2001-1, USPS-LR-J-97, p. 31 (Art. 17).

For all of the reasons discussed above, the Postal Service objects to interrogatories DFC/USPS-T16-2 and -4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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.

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