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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO OFFICE OF THE
CONSUMER ADVOCATE INTERROGATORY OCA/USPS-25(a)
(August 19, 1996)

The United States Postal Service hereby objects to Office of the Consumer Advocate interrogatory OCA/USPS-25(a), filed on August 9, 1996. The information requested is not relevant and would be unduly burdensome to produce.

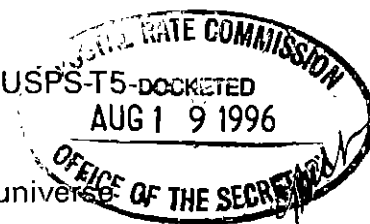
The interrogatory states:

OCA/USPS-T-25. Please refer to Attachment 2 to OCA/USPS-T-5-DOCKETED 13b.

- a. Please provide a similar table containing employee universe counts.
- b. Please confirm that these employee universe counts are used to develop estimation weighting factors. If you do not confirm, please explain and provide the employee universe counts used for weighting.

Attachment 2 to OCA/USPS-13b provided the !OCS effective sample size by craft and stratum. The OCA now requests a similar table for "employee universe counts" in the belief that such counts are used to develop estimation weighting factors.

In fact, employee universe counts are not used to develop estimation weighting factors. Production of a table containing employee universe counts is



thus irrelevant.¹

Moreover, production of such a table would be unduly burdensome. Information on the total universe of postal employees would have to be developed from sources other than the IOCS on a pay period by pay period basis. The Postal Service cannot begin to estimate the time and effort involved in such an undertaking. It is clear, nonetheless, that such effort would be enormous. Particularly in light of the lack of relevance of the information, imposition of such a burden is unwarranted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
August 19, 1996

¹ The Postal Service will provide a response to subpart (b) of OCA/USPS-25, confirming that employee universe counts are not used in developing estimation weighting factors.

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
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