

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-1000

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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 INTERROGATORIES OCA/USPS-36(a) and (b),
37(a) and (b), 42(f), 43(f), and PARTIAL OBJECTION TO OCA/USPS-47
(August 26, 1996)

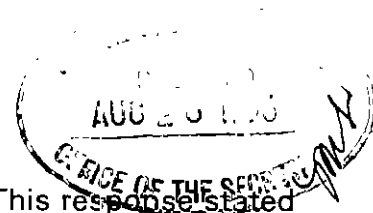
The United States Postal Service hereby objects in full to Office of the Consumer Advocate interrogatories OCA/USPS-36(a) and (b) and 37 (a) and (b), filed on August 14, 1996, and to OCA/USPS-42(f), 43(f), and, in part, to OCA/USPS-47, filed on August 16, 1996. All of these interrogatories are objected to on the grounds of relevance and undue burden; some are also objected to based on proprietary and confidentiality concerns. Each interrogatory and the specific objections thereto are discussed below.

OCA/USPS-36(a) and (b) state:

36. Please refer to the response to OCA/USPS-T5-22. This response stated that a programming error caused incorrect c.v. estimates to be produced for the Rural Carrier System in USPS-LR-G-127.

- a. Please provide a table of FY 1993 Rural Carrier System c.v.'s correcting the ones filed in G-127.
- b. If the corrected FY 1993 Rural Carrier System c.v.'s are still small relative to those of SSR-90, please explain any additional reasons that could account for the reliability decreases.

The requested information is irrelevant. FY 1993 was the Base Year in Docket No. R94-1, a docket that has been concluded for some time now. Whether various pieces of data and information produced by the Postal Service, the OCA, other parties,



or even the Commission in its recommended decisions later turn out to be off the mark or even incorrect is water under the bridge at this point. The FY 1993 c.v. estimates for the Rural Carrier System did not even have any bearing on the rates set in Docket No. R94-1. They most certainly have no bearing on the proposals in this docket.

Further, the requested information would be unduly burdensome to produce. The Postal Service estimates it would take approximately 4 to 5 full person-days to rewrite and rerun the programs necessary to produce the FY 1993 c.v. estimates for the Rural Carrier System. Particularly given the lack of relevance of the information, the Postal Service should not be required to undertake the effort involved in producing it.

OCA/USPS-37(a) and (b) provide:

Please refer to Tables 4-6 of USPS-LR-SSR-90.

- a. Please provide the programs used to produce the costs and c.v. estimates presented in these tables. If they have already been provided, please provide a citation to the appropriate MC96-3 library reference.
- b. Please confirm that the IOCS FY 1995 data file provided as USPS LR-SSR-22 is the only input file required by the programs used to produce Tables 4-6 of SSR-90. If you do not confirm, please provide the additional files.

The Postal Service objects because providing the program referenced in subpart (a) and the additional file requested in subpart (b) contain Postal Service finance numbers. The Postal Service considers finance numbers to be proprietary, commercially sensitive, and confidential.

Further, the information requested is not relevant. The Postal Service has provided estimated costs, c.v. estimates and confidence limits in Tables 4-6 of LR-

SSR-90. Further detail on the IOCS has been provided in interrogatory responses and in other IOCS documentation. The OCA has given no indication of why it needs the requested information. It is not clear what value there is to any party in this case or to the Commission in having OCA essentially reproduce Tables 4-6 of LR-SSR-90.

Finally, while the information could be produced with finance numbers deleted and/or with bogus or "dummy" finance numbers substituted, it would be unduly burdensome to do so. The Postal Service estimates that it would take 3 or 4 full person-days to review the program and file to delete and substitute other numbers, where appropriate. Also, compiling the revised program and file would involve the Postal Service's mainframe computer operations at San Mateo, California and thus another 2 to 3 days beyond the 3 to 4 days already estimated would be needed to coordinate production between San Mateo and postal headquarters.

OCA/USPS-42(f), 43(f), and 47, state, respectively

[42]

- f. Please provide confidence intervals for the FY 1993 highway distribution key estimates in a form that can be compared to those included with the output of TRACS.EXPAND.HWY.PQ495.CNTL(HWY11).

[43]

- f. Please provide confidence intervals for the FY 1993 rail distribution key estimates in a form that can be compared to those included with the output of TRACS.EXPAND.RAIL.PQ495.CNTL(RAIL8).

47. For each component of the TRACS system, please provide the sample size (number of primary sampling units and number of secondary sampling units), corresponding universe sizes, and sampling rate by sampling strata. Please provide this sample design documentation separately for FY 1993 and for FY 1995.

The Postal Service objects to providing the FY 1993 data requested in the above interrogatories.¹ As with OCA/USPS-36(a) and (b), the requested information is irrelevant as Docket No. R94-1, for which FY 1993 was the base year, has long since been closed. The OCA should have requested these data in that docket.

Even assuming the FY 1993 data are relevant, which the Postal Service does not concede, the quarterly data requested in 42(f) and 43(f) are not necessary. The Postal Service will provide a response to OCA/USPS-40, providing FY 1995 annual variance estimates for TRACS which would allow comparison with the annual figures presented in USPS LR-G-106 for FY 1993.

The FY 1993 information requested in the above interrogatories would be unduly burdensome, and may not even be possible, to produce. The data needed to respond to interrogatories 42(f) and 43(f) are maintained by a Postal Service contractor. Electronic files for FY 1993 responsive to these requests no longer exist. Some, but possibly not all, hard copy documents do exist. However, some of these materials have been archived in storage boxes offsite. The Postal Service estimates that for its contractor to retrieve and search several years worth of boxes for the appropriate FY 1993 information would take 3 to 4 full person-days. With regard to interrogatory number 47, the Postal Service has responsive hardcopy documents at headquarters; electronic files no longer exist. To sift through those documents in order to provide the requested information also would take approximately 3 to 4 full person-days. Such burdens are unwarranted in light of the dubious relevance of the information.

¹ The Postal Service will provide a response to OCA/USPS-47 for FY 1995.

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Susan M. Duchek

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

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