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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

OPPOSITION OF THE UNITED STATES POSTAL SERVICE TO OFFICE OF THE
CONSUMER ADVOCATE MOTION TO COMPEL A RESPONSE TO
INTERROGATORY OCA/USPS-25(a)
(August 27, 1996)



The United States Postal Service hereby responds to the Office of the
Consumer Advocate Motion to Compel a Response to Interrogatory OCA/USPS-
25(a) ("OCA Motion"), filed on August 20, 1996. The OCA has not made
convincing arguments demonstrating either the relevance of the information or why
it would not be burdensome to produce. Accordingly, the OCA's motion must be
denied.

The OCA filed interrogatory OCA/USPS-25(a) on August 9, 1996. That
interrogatory basically requested that the Postal Service produce a table showing
the employee universe by craft and stratum. On August 19, 1996, the Postal
Service objected on grounds of relevance and burden. *Objection of the United
States Postal Service to Office of the Consumer Advocate Interrogatory OCA/
USPS-25(a)*. On August 20, 1996, the OCA filed its motion to compel, arguing
that the information should be produced.

The OCA urges that the dispute over interrogatory 25(a) be resolved by
reference to Presiding Officer's Ruling No. MC96-2/7. That ruling, however, is not
germane to the present controversy. That ruling concerned a discrete market

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research survey. That is hardly comparable to a request that the Postal Service categorize by craft and stratum all of its 700,000 plus employees.¹

The OCA's argument concerning the relevance of the requested information is without merit. The OCA merely states that the information "is relevant to judge the overall reliability of the IOCS." *OCA Motion at 2*. Nowhere does the OCA make any showing that the information is necessary to evaluate the specific, limited special service proposals made in this case.

Moreover, the requested information really would not provide information of value for assessing the reliability of the IOCS. The IOCS does not measure employees or numbers of employees. Rather, "[t]he In-Office Cost System uses a probability sample of work time to estimate proportions of employee work time spend on various activities. . . ." *USPS LR-SSR-90 at 14*. The relevant variable is proportion of employee work time, not employees or numbers of employees. The actual numbers of postal employees by craft and stratum tells one nothing about cost incurrence as reflected by the IOCS.

Furthermore, the Postal Service already has produced, as it always does, other information from which the parties and Commission can make determinations

¹ The OCA states that the Postal Service has raised no confidentiality concerns similar to those raised concerning the market research survey in Docket No. MC96-2. *OCA Motion at 2*. The Postal Service does not interpret OCA/USPS-25(a) as requiring any information, such as facility-specific data, finance numbers, or employee names, salaries, and social security numbers, which would be considered confidential. If the OCA is, in fact, requesting such information or other information which might tend to reveal items such as these, then the Postal Service does object on the grounds of confidentiality and commercial sensitivity.

concerning the reliability of the IOCS. USPS LR-SSR-90, Tables 4-6 contains c.v. estimates and confidence limits reflecting IOCS reliability. Also, the Postal Service has provided detailed information concerning the IOCS in other interrogatory responses, including number of offices in the IOCS sample and the universe by CAG, the sampling rate and effective sample size by stratum and craft, descriptions of changes in estimation formulas since FY 1993, and a listing of IOCS sample offices by CAG for FY 1993 through FY 1995. See *U.S. Postal Service Responses to OCA/USPS-T5-13-15, OCA/USPS-21-24 and 26-30*. Further information has been provided in IOCS documentation. Information of the type requested in OCA/USPS-25 — particularly in light of its limited usefulness — should not be required to be produced by the Postal Service.

The OCA makes much of the fact that the Postal Service did not give a specific estimate of the time involved in responding to OCA/USPS-25(a), stating that this is "required by section 25(c) of the rules of practice." *OCA Motion at 1*. In fact, rule 25(c) states that such estimates need only be provided "to the extent possible." *Rule 25(c)*. The Postal Service still is unable to estimate with any degree of certainty the amount of time needed to respond.

As the Postal Service stated in its initial objection, the information will have to be compiled from sources other than the IOCS. In fact, information from several sources may have to be extracted and/or recompiled in order to produce the information in the format requested by the OCA. A new program or programs would need to be written to accomplish this. This will take some amount of time.

Also, a substantial amount of time is involved in running such programs against large databases of information.² In addition, there are any number of other jobs being run at any point in time. Other processing priorities may delay this particular project. Any compilation will have to ensure that any facility-specific, finance number, or employee identifying data are deleted. The interrogatory seems to require the information for all of FY 1995. This means that any compilation would have to be done on a pay period by pay period basis as the number of employees can fluctuate from pay period to pay period. Of course, producing the information for a "snapshot" in time at the end of FY 1995 would reduce the burden of responding. The Postal Service believes that it could take at least a month to respond if data are to be produced for all pay periods.³

Imposition of such a burden clearly is not called for when the requested information has not been shown to have a direct bearing on the proposals in the case and is of limited utility in assessing IOCS reliability, and when other information more useful for that purpose already has been provided. Therefore, the OCA's motion to compel must be denied.

² Obviously, any database containing information relative to the universe of all postal employees is large.


³ Even if the "snapshot" approach is followed, a response still may take as much as a week. The Postal Service still considers this unduly burdensome given the tenuous relevance and usefulness of the information.

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Respectfully submitted,

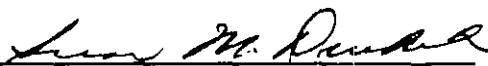
UNITED STATES POSTAL SERVICE

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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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