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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0

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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-57, 62, 65(d), (e), (f)
and (h), 66(a), (c)(i) and (ii), 67(a), (c)(i) and (ii), and 68, and PARTIAL OBJECTION
TO OCA/USPS-65(a)
(September 9, 1996)

The United States Postal Service hereby objects in full to Office of the
Consumer Advocate interrogatories OCA/USPS-57 and 62, filed on August
1996, and to OCA/USPS-65(d), (e), (f) and (h), 65(a), (c)(i) and (ii),
and (ii), 67(a), (c)(i) and (ii), and 68, and in part to OCA/USPS-65(a), filed on
August 30, 1996. These interrogatories are objected to on various grounds
including relevance, undue burden, and commercial sensitivity. Each interrogatory
and the specific objections thereto are discussed below.

OCA/USPS-57(a) requests that the Postal Service provide on CD-ROM, in a
format useable by PC SAS, all TRACS data and programs filed as LR-SSR-84 (on 9-
track tapes) . OCA/USPS-57(b) requests all SAS data sets contained in LR-SSR-84
be provided in a format useable by PC SAS. First, the Postal Service objects to
this interrogatory (both subparts) on the basis of relevance. This is not a case
where materials have not been produced; rather, the OCA wants them produced in
a different format. The OCA has had the material on 9-track tapes since the start
of the case, the format in which the data have been provided in the past. Also,
the TRACS data are irrelevant to the limited special services issues presented in
this case. TRACS does not even collect data on special services. Additionally, the
request does not appear justified under Special Rule 2E, as there is no indication

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why it is necessary that data already provided needs to be provided in a different format for use in this case.

Moreover, it would be unduly burdensome to provide all TRACS data and programs on CD-ROM as requested in OCA/USPS-57(a). The Postal Service indicated at the technical conference held on July 17, 1996, that it would investigate CD-ROM possibilities. It has started such efforts and is on the verge of testing, but is not ready to provide databases or other information on CD-ROM. The Postal Service contractor responsible for the TRACS system says it would need to download these files from the Postal Service's mainframe computer in San Mateo, California. The 28 air frame files alone are each approximately 45 megabytes, for a combined size of over 1.2 gigabytes, twice the capacity of a CD-ROM. It is estimated that successful retrieval of the air frame files at a steady 28.8 rate, with absolutely no errors, would take approximately 12 hours of supervised downloading.¹ Of course, it is not reasonable to expect a steady 28.8 connection, uninterrupted and error-free, for 12 straight hours. Thus, it is more likely that downloading the air frame files would take approximately 36 hours. While the air frame files are the largest component of the TRACS data, the remaining files are not insignificant and probably would take an additional 36 hours to download.

The actual writing of the CD-ROM would also take several hours. In addition, to file all of the data on a single CD-ROM (of approximately 600 megabytes capacity) would require that the files be compressed using the ZIP process or equivalent, which, even on a high-powered Pentium PC, would take several more

¹ Files on the mainframe migrate after a certain period of inactivity, thus contributing to the time needed to download.

hours, given the large quantity of data. Further, the file names would have to be converted to meaningful and uniquely identifiable file names compatible with the PC operating system, taking several additional hours. The total time thus estimated for writing the CD-ROM would be approximately 6 to 9 hours.

Moreover, the entire collection of TRACS data would exceed the hard drive capacity of a typical PC.² An interested party would not be able to read ZIPped (compressed) data directly off the CD-ROM into PC SAS. Thus, the party would either have to unZIP (decompress) the data onto their local hard drive (which could be a problem given the hard drive capacity of a typical PC), or the CD-ROM files could not be compressed in the first place, thus requiring multiple CD-ROMs with further attendant complications. Even if SAS could read the data directly off the CD-ROM, the SAS working directory would require more hard disk space than would likely be available on a typical PC.

With regard to the request in OCA/USPS-57(b) that all SAS data sets contained in LR-SSR-84 be provided in a format useable by PC SAS, the files contained on the LR-SSR-84 data tapes are in ASCII text format, which can be read into PC SAS after the data are transferred from the tapes to a PC. Thus, the data are already in a format useable by PC SAS.

OCA/USPS-62(a) -(d) requests information concerning the Postal Service's CRA auditors. Although couched as a follow-up to OCA/USPS-T5--13, concerning finance number restructuring within the IOCS, the new interrogatory goes well beyond that, asking such things as whether the CRA auditor investigates the validity of statistical estimates or evaluates statistical systems. Commission rules

² The OCA may not have a typical PC in this respect, but other interested parties likely would.

require that postal representatives certify "that the cost statements and supporting data" submitted with requests for rate and classification changes accurately reflect the Postal Service's books, and that an opinion from an independent public accountant be submitted, as required pursuant to 39 U.S.C. § 2008(e). *Rules 54(p) and (q)*. More is not required; thus inquiry into any discussions or communications, oral or written, between the Postal Service and the CRA auditors, or any inquiry into audit tasks or audit scope is not relevant. The OCA is free to make whatever it wants to out of the IOCS finance number restructuring or any other aspect of IOCS, and can do this without delving into matters between the Postal Service and its auditors.³

Further, the scope of the audit and any discussions or communications concerning the audit consist of confidential and commercially sensitive information, both to the auditors and to the Postal Service. Auditors would not want other audit firms to have access to information on how they conduct an audit because of the potential for taking away business. Likewise, the Postal Service considers both the process it goes through in an audit as well as information it reveals during an audit to be commercially sensitive. Some jurisdictions recognize an accountant-client privilege. Similar principles should apply here.

The Postal Service objects in part to OCA/USPS-65(a). Specifically, the Postal Service objects to that portion of the interrogatory requesting a copy of the file TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT. This file is the same as ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT on the data tapes, except that the latter file on the data tapes has commercially sensitive information deleted,

³ Of course, the OCA has yet to make a convincing argument that any of the wide-ranging discovery on data systems that it has undertaken in this docket has any bearing on the Postal Service's specific proposals.

including such things as certain origin-destination and facility-specific information.⁴ If the OCA request is for the file without any deletions, then the Postal Service objects on grounds of commercial sensitivity.

The Postal Service also objects to OCA/USPS-65(d) on the grounds that submitting the complete data would reveal commercially sensitive information as described in the preceding paragraph. Further, attempting to modify the programs to ignore the commercially sensitive information would be unduly burdensome and also would be futile, as the modified programs would produce different results.

OCA/USPS-65(e) calls for the Postal Service to print out the first 60 records of ALAHQN.HIGHWAY.PQ495.SURVEY.TEXT. This file was furnished on the 9-track tapes provided in LR-SSR-84. The OCA should do this work itself. OCA/USPS-65(f) calls for the Postal Service to print out the first 60 records of TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT. As indicated above, this file contains commercially sensitive information.

The Postal Service also objects to OCA/USPS-65(h), which asks that any files provided in response to the interrogatory be provided on diskette or CD-ROM, on the basis of commercial sensitivity. Also, as discussed previously with regard to OCA/USPS-57, the Postal Service objects to providing the data on CD-ROM.

Further, all of the above subparts of OCA/USPS-65 are objected to on the basis of relevance. The OCA has demonstrated neither what bearing these requests have on the limited proposals presented in this case nor how it might use the requested information in this case.

⁴ The TRACS data tapes filed in Docket No. R94-1 likewise had commercially sensitive information deleted.

OCA/USPS-66(a) requests that 4 data sets relating to TRACS Highway be provided "on a diskette (or other medium such as CD ROM) in a format easily accessible by PCs."⁵ These files already have been submitted (with commercially sensitive variables deleted) in electronic form on tape #885225. To submit these files on CD-ROM or diskette would be burdensome, and of limited utility, as described above in the objection to OCA/USPS-57. The Postal Service objects to OCA/USPS-66(c)(i), which seems to call for production of the data sets containing commercially sensitive variables. The Postal Service also objects to OCA/USPS-66(c)(ii), which seems to call for modified programs as attempting to modify the programs to ignore the commercially sensitive information would be unduly burdensome and also would be futile, as the modified programs would produce different results.

Further, all of the above subparts of OCA/USPS-66 are objected to on the basis of relevance. The OCA has demonstrated neither what bearing these requests have on the limited proposals presented in this case nor how it might use the requested information in this case.

OCA/USPS-67(a) requests that 4 data sets relating to TRACS Rail be provided "on a diskette (or other medium such as CD ROM) in a format easily accessible by PCs." These files already have been submitted (with commercially sensitive variables deleted) in electronic form on tapes #885225, 887619, and 887618. To submit these files on CD-ROM or diskette would be burdensome, and of limited utility, as described above in the objection to OCA/USPS-57. The Postal Service

⁵ To the extent that this interrogatory requests TRACSSMN.HIGHWAY.PQ495.SURVEY.TEXT, provision of this file has been already been objected to in the discussion of OCA/USPS-65(a), (d) and (h).

objects to OCA/USPS-67(c)(i), which seems to call for production of the data sets containing commercially sensitive variables. The Postal Service also objects to OCA/USPS-67(c)(ii), which seems to call for modified programs as attempting to modify the programs to ignore the commercially sensitive information would be unduly burdensome and also would be futile, as the modified programs would produce different results.

Further, all of the above subparts of OCA/USPS-67 are objected to on the basis of relevance. The OCA has demonstrated neither what bearing these requests have on the limited proposals presented in this case nor how it might use the requested information in this case.

OCA/USPS-68 requests Amtrak estimation programs input data files "on a diskette (or other medium such as CD ROM) in a format easily accessible by PCs." These files already have been submitted (with commercially sensitive variables deleted) in electronic form on tapes #887618, 887619, and 885225. To submit these files on CD-ROM or diskette would be burdensome, and of limited utility, as described above in the objection to OCA/USPS-57. The Postal Service objects to the extent that this interrogatory seems to call for production of the data sets containing commercially sensitive variables. Further, OCA/USPS-68 is objected to on the basis of relevance. The OCA has demonstrated neither what bearing these requests have on the limited proposals presented in this case nor how it might use the requested information in this case.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.



Susan M. Duchek

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