

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

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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 UNITED PARCEL  
SERVICE INTERROGATORY USP/USPS-3  
(September 13, 1996)

The United States Postal Service hereby objects to United Parcel Service interrogatory UPS/USPS-3, filed on September 3, 1996. This interrogatory is objected to on the grounds that it is not proper follow-up, is irrelevant, and is overly broad in scope.

UPS/USPS-3 provides, in part:

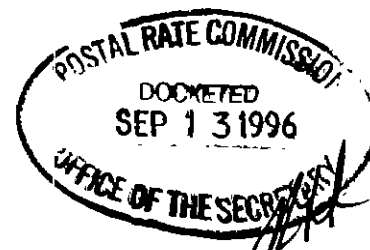
Please refer to your response to OCA/USPS-26 and to the table below.

(a) Please confirm that costs associated with CAG A offices have significantly decreased from 1993 to 1995. If confirmed, please explain what caused this decrease. If you cannot confirm, please explain in full.

(b) Please confirm that costs associated with CAG B offices have significantly increased from 1993 to 1995. If confirmed, please explain what caused this increase. If you cannot confirm, please explain in full.

(c) Please explain the changes from 1993 to 1995 in the costs associated with CAGs C-J.

A table purportedly comparing Cost Segment 3.1, Clerks and Mailhandlers, IOCS tally dollars by CAG for 1993 and 1995 follows the text of the interrogatory. A source for the table is not cited, nor is there an explanation of how the numbers contained in the table were derived.



UPS has styled this a follow-up interrogatory and attempts to tie the question to the Postal Service's response to OCA/USPS-26. In fact, the interrogatory has nothing to do with the response to OCA/USPS-26, which merely confirmed that each line in a previously produced listing of IOCS CAG assignments for sample offices for FY 1993 through FY 1995<sup>1</sup> corresponded to a unique finance number, and further confirmed that the Postal Service did not maintain similar listings for prior years because of the FY 1992 restructuring of finance numbers.

Further, the requested information is irrelevant to this case. FY 1993 was the base year in Docket No. R94-1, a case which has long since been closed. If UPS failed to ask all the questions it wanted to about 1993 IOCS figures in that docket, it is too late for it to conduct that discovery now. Also, it is not at all clear how UPS would use the requested information in this case, which involves only limited special service proposals. UPS has filed only a small portion of the written discovery in this case and, during the course of the recently-concluded hearings, UPS asked no questions of any of the Postal Service's witnesses.

In addition, it would be unduly burdensome to respond to the interrogatory. UPS has cited no source for the numbers contained in the table. Presumably, the most effective way to verify that UPS's numbers are accurate would be for the Postal Service to run the IOCS data tapes for both 1993 and 1995. Even assuming the numbers could be verified, the interrogatory asks that the Postal Service explain reasons for any differences between the costs for 1993 and 1995

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<sup>1</sup> See Attachment to response to OCA/USPS-T5-15.

for every CAG. There conceivably could be an infinite number of reasons for cost differences. The interrogatory is so broad that it would be nearly impossible to answer.


UPS and other participants should focus on the specific proposals in this case, and should not be allowed to stray into every area that catches their passing fancy.

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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