

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 OFFICE OF THE
CONSUMER ADVOCATE INTERROGATORY OCA/USPS-73 AND PARTIAL
OBJECTION TO OCA/USPS-70, AND 71(b) and (c)
(September 16, 1996)

The United States Postal Service hereby objects in full to Office of the Consumer Advocate interrogatory OCA/USPS-73, and in part to OCA/USPS-70 and 71(b) and (c), filed September 5, 1996. All of these interrogatories are objected to on the grounds of relevance; some are also objected to based on concerns with revealing commercially sensitive information. Each interrogatory and the specific objections thereto are discussed below.

OCA/USPS-70 asks that for 96 CAG A/B offices not in the FY 1995 IOCS sample, the Postal Service identify (a) how many had no chance for selection, (b) the specific finance number for each, (c) the CAG, and (d) the reason for its absence from the sampling frame. The Postal Service will provide a partial response, but objects to listing specific finance numbers, CAG designation and reason for absence from sampling frame for the 96 offices.

As with previous objections to this type of interrogatory, the Postal Service believes that the OCA is embarked on a fishing expedition having no relevance to the issues in this case. The Postal Service has provided responses to previous interrogatories in which it indicated that although certain offices might not be included in the IOCS sample, "their labor costs are incorporated in the cost based weighting

methodology where costs reflect labor costs for all offices within a CAG stratum.” See *Response of the United States Postal Service to Interrogatories of the Office of the Consumer Advocate (OCA/USPS-49, 50–52, 53(a), 54–55, 56(a)-(b) and (d)-(e)), September 6, 1996 (responses to numbers 54(c) and (e))*. Thus, the request is both irrelevant and moot. As also argued in other objections, this discovery is not proper under Special Rule 2.E as the OCA has made no showing of how it would use such information to develop any testimony it intends to submit in this case. Finally, specific finance numbers are proprietary and commercially sensitive. These numbers could be matched up with other available data, for example, office names, which would involve release of facility-specific information, which could be advantageous to postal competitors.

OCA/USPS-71 (b) and (c) request that the Postal Service provide a more recent copy of the TRACS training manual, and also provide other data collection instruction materials for FY 1995-1997. The Postal Service will provide responses to OCA/USPS-71(b) and (c), indicating that there currently is not a more recent TRACS training manual, nor are there other materials for FY 1995-FY 1997 used to instruct data collectors. Nonetheless, the Postal Service objects in part to these questions to the extent that they call for information for years subsequent to FY 1995. FY 1995 is the base year in this case, and it is thus only FY 1995 data that may be relevant.¹

¹ The Postal Service concedes that there may be legitimate inquiry into some aspects of the FY 1995 data *if* that inquiry has some bearing on the issues presented in this case. So far, the OCA has been woefully remiss in linking its broad-ranging discovery requests to the specific proposals in this docket.

Moreover, the OCA has not shown any link between this request and any testimony it plans to file in this case, and no such link is apparent. The request, therefore, does not constitute proper discovery under Special Rule 2.E.

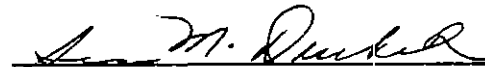
OCA/USPS-73 requests FY 1996 and FY 1997 training materials, defined as "training manuals and field operating instructions" for IOCS, RPW, CCS, RCS, and TRACS, and also asks for any notice of changes for FY 1996 and FY 1997 pursuant to § 3001.102(d)(4). Again, data and data collection matters for years subsequent to FY 1995, the base year in this case are irrelevant. The OCA has not and cannot demonstrate that such a broad-ranging request covering all data systems has anything to do with any testimony it might plan. Thus, the request violates Special Rule 2.E.²

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



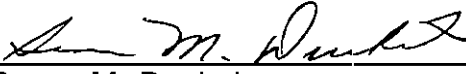
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September 16, 1996

² Although the Postal Service objects to the interrogatory in its entirety, it does note that there are no new training manuals for the listed systems.

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.



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