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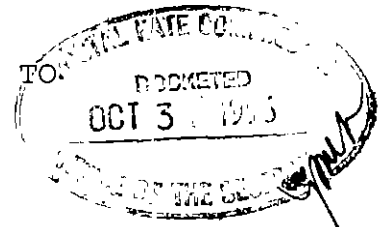
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE OBJECTION TO
INTERROGATORY USPS/OCA-T400-24
(October 31, 1996)



The Office of the Consumer Advocate (OCA) hereby objects to interrogatory USPS/OCA-T400-24, submitted October 21, 1996. Part a. of this interrogatory asks witness Collins to "confirm that [she] read a final version of Dr. Sherman's testimony" prior to filing her testimony. OCA objects to this question on the ground that it is irrelevant to any issue that the Commission must resolve in this proceeding. Part b. asks witness Collins whether she "agree[s] with all statements made in Dr. Sherman's testimony," and, if not, to "identify all statements in witness Sherman's testimony (by page and line number) with which [she] disagree[s] and why [she] disagree[s]" It is obvious merely in quoting this part of the interrogatory that the Postal Service is seeking to have its own work performed by OCA witnesses. No witness should be obliged to expend the time and effort called for in scrutinizing another witness' testimony

line-by-line to see whether she agrees with each of the other individual's specific statements.

The purpose of these questions appears to be founded on a Postal Service belief that there are inconsistencies between the testimonies of witnesses Sherman and Collins.¹ If the Postal Service wishes to scrutinize the testimony of these two witnesses for inconsistencies, it is free to do so. After completing a comparison of the two pieces of testimony, if inconsistencies come to light, specific statements may be cited or quoted to witnesses Collins and/or Sherman in questions. However, OCA has no duty to perform this investigation for the Postal Service. If legitimate questions are posed, OCA witnesses will answer them. However, as framed, interrogatory USPS/OCA-T400-24 does not seek relevant, material information from witness Collins. Consequently, OCA objects to the captioned interrogatory.


Respectfully submitted,


SHELLEY S. DREIFUSS
Attorney

¹ OCA, of course, believes that these two pieces of testimony are entirely consistent.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
October 31, 1996