

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
REQUESTING WAIVER OF THE NEW COMMISSION RULES  
WITH RESPECT TO CATEGORY 1 LIBRARY REFERENCES  
(January 12, 2000)

By separate pleading, the Postal Service has submitted with its Request a notice regarding the master list of library references included with the filing. The instant motion is a request for waiver, where necessary, of the Commission's new procedures governing library reference practice, with respect to all Category 1 (Data Reporting Systems) library references. The relevant library references have been identified as such in the master list in the "Category" column, and are also identified below:

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|---|--------------|--|
| 1 | USPS-LR-I-1  | Summary Description of USPS Development of Costs by Segments and Components, FY 1998                 |
| 1 | USPS-LR-I-2  | USPS Costs and Revenue Analysis, FY 1998   |
| 1 | USPS-LR-I-3  | Development of Cost Segments and Components Report, FY 1998; Final Adjustment Report, FY 1998        |
| 1 | USPS-LR-I-12 | In-Office Cost System (IOCS) Statistical and Computer Documentation (Source Code and Data on CD-ROM) |
| 1 | USPS-LR-I-13 | IOCS-CODES Computer System Documentation   |
| 1 | USPS-LR-I-14 | Handbook F-45, In-Office Cost System, Field Operating Instructions                                   |

- 1 USPS-LR-I-15 IOCS-CODES, Computer System Source Code (CD-ROM)
- 1 USPS-LR-I-16 City Carrier Cost System (CCCS) Statistical and Computer Documentation (Source Code and Data on CD-ROM)(Harahush, USPS-T-3)
- 1 USPS-LR-I-17 Rural Carrier Cost System (RCCS) Statistical and Computer Documentation (Source Code and Data on CD-ROM)(Harahush, USPS-T-3)
- 1 USPS-LR-I-18 Handbook F-65, Data Collection User's Guide for Cost System (Harahush, USPS-T-3)
- 1 USPS-LR-I-19 CCS-CODES Computer System Documentation (Harahush, USPS-T-3)
- 1 USPS-LR-I-20 CCS-CODES Computer System Source Code (CD-ROM)(Harahush, USPS-T-3)
- 1 USPS-LR-I-21 Domestic Revenue, Pieces, and Weight System (DRPW), System Documentation Description
- 1 USPS-LR-I-22 Domestic Revenue, Pieces, and Weight System (DRPW), Listing of Input Data
- 1 USPS-LR-I-23 Domestic Revenue, Pieces, and Weight System (DRPW), Machine Readable Copy of Input Data (1 CD-ROM)
- 1 USPS-LR-I-24 Domestic Revenue, Pieces, and Weight System (DRPW), Postal Service ADP Documentation
- 1 USPS-LR-I-25 Bulk Mail Revenue, Pieces, and Weight System (BRPW), Postal Service System Documentation
- 1 USPS-LR-I-26 Bulk Mail Revenue, Pieces, and Weight Statistical Systems Methodology and Design

- 1 USPS-LR-I-27 Domestic Mail Revenue, Pieces, and Weight Statistical Systems Methodology and Design
- 1 USPS-LR-I-28 Bulk Mail Revenue, Pieces, and Weight Variance Estimation and Code
- 1 USPS-LR-I-29 DRPW Variance Estimation and Code (1 CD-ROM)
- 1 USPS-LR-I-30 Revenue, Pieces, and Weight (RPW) Adjustment System
- 1 USPS-LR-I-31 Revenue, Pieces, and Weight System (RPW), Source Code Listings, Domestic RPW
- 1 USPS-LR-I-32 Domestic Revenue, Pieces, and Weight System (DRPW), Machine-Readable Source Code (CD-ROM)
- 1 USPS-LR-I-33 Revenue, Pieces, and Weight System (RPW), Listing of Output Data
- 1 USPS-LR-I-34 Revenue, Pieces, and Weight System (RPW), Machine-Readable Copy of Output Data (1 diskette)
- 1 USPS-LR-I-35 RPW-CODES, Computer System Documentation Description
- 1 USPS-LR-I-36 RPW-CODES, Data Entry Application Technical Documentation
- 1 USPS-LR-I-37 Handbook F-75, Data Collection User's Guide for Revenue, Volume, and Performance Measurement Systems
- 1 USPS-LR-I-38 RPW-CODES, Bases Unit Application Technical Documentation and CODES Administrator's Guide
- 1 USPS-LR-I-39 RPW-CODES, Mainframe Application Technical Documentation

1	USPS-LR-I-40	RPW-CODES, Printed Source Code for the Data Entry Application
1	USPS-LR-I-41	RPW-CODES, Printed Source Code for the Base Unit Application
1	USPS-LR-I-42	RPW-CODES, Printed Source Code for the Mainframe Application
1	USPS-LR-I-43	RPW-CODES, Source Code on CD for all three RPW Applications
1	USPS-LR-I-44	Permit System, User Guide and Periodical User Guide
1	USPS-LR-I-45	Permit System, Computer System Documentation Description
1	USPS-LR-I-46	Permit System, Source Program in Printed Form
1	USPS-LR-I-47	Permit System, Postal Service ADP Documentation
1	USPS-LR-I-48	Permit System, Source Code Listings
1	USPS-LR-I-49	TRACS Commercial Air Subsystem Statistical and Computer Documentation (Source Code and Data on CD-ROM)
1	USPS-LR-I-50	TRACS Passenger Rail (Amtrak) Subsystem Statistical and Computer Documentation (Source Code and Data on CD-ROM)
1	USPS-LR-I-51	TRACS Network Air Subsystem Statistical and Computer Documentation (Source Code and Data on CD-ROM)
1	USPS-LR-I-52	TRACS Highway Subsystem Statistical and Computer Documentation (Source Code and Data on CD-ROM)
1	USPS-LR-I-63	TRACS-CODES Computer System

Documentation

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|---|---------------|--|
| 1 | USPS-LR-I-64  | TRACS-CODES Computer System Source Code (CD-ROM)                               |
| 1 | USPS-LR-I-65  | RPW Sample Selection System, Computer Documentation                            |
| 1 | USPS-LR-I-66  | RPW Sample Selection System, Listing of Input Data and Source Code             |
| 1 | USPS-LR-I-67  | RPW Sample Selection System, ADP Documentation                                 |
| 1 | USPS-LR-I-68  | REP Sample Selection System, Machine Readable Source Code and Input Data on CD |
| 1 | USPS-LR-I-69  | ODIS-CODES, Computer System Documentation Description                          |
| 1 | USPS-LR-I-70  | ODIS-CODES, Data Entry Application Technical Documentation                     |
| 1 | USPS-LR-I-71  | ODIS-CODES, Base Unit Application Technical Documentation                      |
| 1 | USPS-LR-I-72  | ODIS-CODES, Mainframe Application Technical Documentation                      |
| 1 | USPS-LR-I-73  | ODIS-CODES, Printed Source Code for the Data Entry Application                 |
| 1 | USPS-LR-I-74  | ODIS-CODES, Printed Source Code for the Base Unit Application                  |
| 1 | USPS-LR-I-75  | ODIS-CODES, Printed Source Code for the Mainframe Application                  |
| 1 | USPS-LR-I-76  | ODIS-CODES, Source Code on CD for all three RPW Applications                   |
| 1 | USPS-LR-I-125 | FY 98 Billing Determinants   |

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|---|---------------|---|
| 1 | USPS-LR-I-161 | RPW Extract File Material, FY 1999, Q3 & Q4                                   |
| 1 | USPS-LR-I-170 | Origin-Destination Information System Quarterly Statistics Reports (FY 98-99) |

Specifically, the Postal Service requests that to the extent that it could be argued that its filing does not actually or substantially comply with all of the requirements of Rule 31(b)(2) with respect to the above Category 1 library references, that those requirements be waived.

The intended primary purposes of the revisions to Rule 31(b)(2) are to limit library references to appropriate circumstances and categories of material, and to insure that adequate information is provided to identify the contents of library references and to indicate how they relate to the case. See Order No. 1263 at 3. The Postal Service submits that, in the context of its Category 1 library references, these purposes are achieved by virtue of the historical practice regarding these types of library references, *and by the information included on the master list, within this motion, and within the library references themselves.* Most specifically, the nature of Category 1 library references is such that there has never been a genuine issue that these materials are most appropriately filed as library references, and their nature is such that there is no need for the filing of a separate notice for each library reference, as might otherwise appear to be required by Rule 31(b)(2)(iv).

Primarily in response to earlier amendments to Rules 31(k) and 54 regarding required background documentation, the Postal Service over many cases has included with its filing a large number of library references relating to its data reporting systems.

(By definition, as these material relate to the Postal Service's data reporting systems, they now constitute Category 1 material under the library reference groupings adopted in the new Rule 31(b)(2)(i).) This practice has generated no controversy, and has thus implicitly been deemed an acceptable vehicle to provide massive amounts of information of generally little interest to most rate case participants. Presumably, those parties that have been interested have been able to satisfy their needs by their own examination of this material, or with the assistance of minimal formal or informal discovery requests to the Postal Service. Based on past practice, it would thus appear to be beyond cavil that reference to, identification of, and use of this material has been and will be facilitated if it is made available as Category 1 library reference material.

Among the distinguishing features of Category 1 material is the fact that its content and/or format tend to be relatively stable from case to case. While stability enhances confidence in the systemic nature of this material, it also leads to difficulties in complying with one aspect of the new rules -- identification of the persons who contributed to its creation. Generally speaking, all Category 1 material is produced by combinations of individuals who at one time or another were responsible for the development, operation, and maintenance of the particular system in question. Those individuals may have been on the Postal Service's internal technical staff, or may have been consultants. Over the years, given the massive nature of the material in question, and the scope of the joint production teams who have assisted in its preparation, awareness of the identity of its creators may not have survived as long as the documentation itself. Moreover, with respect to documents which present or summarize the quarterly or annual outputs of a data system, the range of individuals

involved would conceivably cover the Postal Service's entire data collection and data processing staffs. Given the presumption of regularity that is accorded business practice records material, however, attempting to identify individuals in this context is neither necessary nor particularly useful.

In terms of other purposes of the new rules, past experience provides no reason to question the ability of parties to understand (to whatever extent has been necessary for their purposes) how the contents of Category 1 references relate to the rest of the case. Moreover, some of the Category 1 material has been reorganized for presentation in this case, which will make its function and purpose even more transparent. Additionally, the Postal Service has made available, and will continue to make available, electronic versions of this material, to the extent possible and appropriate. Lastly, each of the Category 1 library references should already be labeled in accordance with proper notation standards.

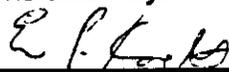
Wherefore, for all of the above reasons, the Postal Service respectfully requests that to whatever extent it could be argued that its filing does not actually or substantially comply with all of the requirements of Rule 31(b)(2) with respect to the

above Category 1 library references, that those requirements be waived.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

**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.



Eric P. Koetting

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