

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

**OBJECTION OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
ANM/USPS-T10-4, 7, 8 and 11, and PARTIAL OBJECTION TO ANM/USPS-T10-10.
(February 17, 2000)**

The United States Postal Service hereby objects to interrogatories ANM/USPS-T10-4, 7, 8 and 11 in full, and ANM/USPS-T10-10 in part, filed on February 7, 2000. The grounds for the objections generally are that the materials requested are irrelevant, pre-decisional, overbroad, would reveal proprietary information, and would be burdensome to produce.

ANM/USPS-T10-4 requests "studies, analyses and similar documents created since January 1, 1998, concerning the costs, benefits, productivity, deployment, or financing of potential successors or alternatives to the FSM 881." As witness Kingsley indicated in her testimony, the AFSM 100 is ultimately intended to replace the FSM 881. See USPS-T-10, at 11. Currently, there are no other "potential successors or alternatives." Nonetheless, the Postal Service objects to this interrogatory on the grounds that materials relating to the selection of the AFSM 100 would reveal information about the Postal Service procurement process that may be proprietary to the Postal Service and its contractors, and likely would be of value to competing bidders and/or competitors. Also, to the extent that any of these materials cover preliminary analyses concerning the AFSM 100, these materials are irrelevant. What is relevant is whatever analysis concerning equipment has been built into the case. In

addition, any preliminary information that served as an input to the decision-making process concerning the AFSM 100 is protected from disclosure as pre-decisional.

ANM/USPS-T-7 and 8 request "all documents submitted to or generated by the Board of Governors of senior Postal Service management" concerning the first and second phases of deployment of the AFSM 100 flat sorting machines, respectively. First, the request is overbroad. For example, "all documents submitted to or generated by Postal management" could cover everything from an official Headquarters memo to a scrawled post-it note from an engineer to any high-level manager in the field. The burden in even attempting to commence a search for such documents cannot be estimated. Moreover, because the first phase of deployment has not yet begun, some materials that have been used as inputs to the decision-making process are protected from disclosure as pre-decisional. Also, to the extent that they cover preliminary management analyses, these are irrelevant. What is relevant is what has been built into the case. Finally, some of the materials may contain information that is proprietary to the Postal Service and its contractors, and that may be of value to competing bidders and/or competitors.

ANM/USPS-T10-11 requests "studies, analyses, reports or similar documents generated by or for the Postal Service concerning the costs, benefits, productivity, performance limitations, financing or appropriate deployment rate of potential alternatives to the AFSM 100." Currently, there are no other "alternatives to the AFSM 100." Nonetheless, the Postal Service objects to this interrogatory on the grounds that materials relating to the selection of the AFSM 100 would reveal information about the Postal Service procurement process that may be proprietary to the Postal Service and its contractors, and likely would be of value to competing bidders and/or competitors. Also, to the extent that any of these materials cover preliminary analyses concerning the AFSM 100, these materials are irrelevant. What is relevant is whatever analysis

concerning equipment has been built into the case. In addition, any preliminary information that served as an input to the decision-making process concerning the AFSM 100 is protected from disclosure as pre-decisional.

The Postal Service also partially objects to ANM/USPS-T10-10. That interrogatory requests "studies, analyses, reports or similar documents concerning almost all aspects of the AFSM 100, including "costs, benefits, productivity, performance limitations, financing, or appropriate deployment rate." The Postal Service intends to provide some information responsive to this interrogatory. However, to the extent that any of the covered information contains information about the Postal Service procurement process that may be proprietary to the Postal Service and its contractors, irrelevant preliminary analyses, or pre-decisional information, then the Postal Service objects on the same bases discussed with regard to the interrogatories discussed in the preceding paragraphs.

For all of the foregoing reasons, the Postal Service objects to these requests.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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February 17, 2000

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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