

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 UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE ALLIANCE OF NONPROFIT MAILERS
TO WITNESS TAYMAN
(ANM/USPS-T9-18(J) & (K), 19(G) & (H), 22(C), 22(F) (IN PART) & 23(A) (IN PART))
(February 22, 2000)

The United States Postal Service hereby objects to interrogatories ANM/USPS-T9-18(j) and (k), 19(g) and (h), 22(c) and (f) in part, and 23(a) in part. All of these interrogatories generally request production of Decision Analysis Reports (DARs) and, as such are objectionable because DARs contain material that is proprietary to either the Postal Service or its contractors, reveal pre-decisional information, and are basically irrelevant.

ANM/USPS-T9-18 asks a series of questions about the information contained in LR-I-126 on the Flat Sorter Machine (FSM) 1000. The Postal Service intends to answer most of the interrogatory, giving information on workhour savings and workhour maintenance from the DAR, if applicable. Subparts (j) and (k) cumulatively request production of the actual DAR (subpart (j)) and "documentation sufficient to verify your responses" (subpart (k)), which presumably is the DAR. Since the Postal Service will be providing the specific information requested in the interrogatory, ANM has no need for the DAR itself. In any event, whether the numbers in the DAR are the same or different from what is in LR-I-126 is itself irrelevant. While such information may be interesting from an historical perspective, the relevant numbers are the current projections and those are already contained in LR-I-126.

Moreover, DARs contain information, such as projected returns on investment and various estimated contract costs, that is proprietary to the Postal Service. Financial strategy information such as this would be of value to postal competitors as well as potential and competing bidders on these and other postal automation equipment. In addition, to the extent that any information contained in the DAR constituted an input to the decision-making process, it is entitled to protection as pre-decisional.

ANM/USPS-T9-19 likewise requests specific information on workhour savings and workhour maintenance relating to the Advanced Flat Sorter Machine (AFSM) 100, but also requests the DAR (subpart (g)) and "documentation sufficient to verify your responses" (subpart (h)). Again, the Postal Service will provide the specific information requested, but objects to providing the DAR for the same reasons outlined in the preceding paragraph.

ANM/USPS-T9-22 requests information concerning the "Accelerate FSM into 2001" section of LR-I-126. Parts of subparts (c) and (f) specifically request DARs, "along with any correspondence, memoranda or other documents relating to the DAR."¹ Once again, the Postal Service will answer the specific questions contained in the various other subparts of ANM/USPS-T9-22, but objects to providing the DARs on the same bases discussed above. In addition, the Postal Service also objects to those portions of these requests which apparently ask for everything relating to the DAR on the grounds that they are irrelevant, overbroad and burdensome. "Other documents relating to the DAR" could encompass emails or Post-It notes that simply forward a DAR. The burden in attempting to even search for piece of paper that happens to mention a DAR is not capable of estimation.

¹ The Postal Service will respond to those sections of the referenced subparts which inquire about the existence of a DAR.

In a similar vein, ANM/USPS-T9-23(a), in part, requests a DAR for the Carrier Sort Bar Code Sorter (CSBCS) and "any correspondence, memoranda or other documents relating to the DAR." That portion of subpart (a) is objected to on the same grounds as ANM/USPS-T9-22 (c) and (f).

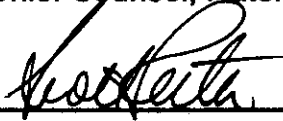
ANM will be provided answers to the specific, tailored inquiries it has made. The Postal Service is objecting only to those questions which represent a fishing expedition to obtain extraneous and protected information.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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.



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
February 22, 2000