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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES UPS/USPS-T1-2-3, 5-6, 8-9, 11-12 AND 14-15
(February 25, 2000)

The United States Postal Service hereby partially objects to interrogatories UPS/USPS-T1-2-3, 5-6, 8-9, 11-12 and 14-15 on the grounds of burden, relevance, trade secret and commercial sensitivity. The entire set of United Parcel Service (UPS) interrogatories (UPS/USPS-T1-2-17) directed to witness Xie (USPS-T-1) constitute a very broad inquiry into the Transportation Cost System (TRACS).

Since the interrogatory set seemed to reflect little understanding of what has been provided by way of documentation and the extensive effort required to do so, the undersigned counsel undertook to contact UPS counsel regarding certain aspects of the interrogatory set that would apparently elicit massively burdensome-to-produce data which would serve no constructive purpose. The net result of this discussion was a telephone conference involving UPS and Postal Service counsel and technical analysts for each party. UPS counsel agreed to consult further within his own organization to determine whether certain of the questions could be narrowed in their scope and get back to the undersigned counsel. The Postal Service is filing this partial objection to preserve its rights in providing only the information reasonably available, and because of the need to apply protective conditions to any material that is provided.

Should UPS counsel provide more narrowly tailored questions, perhaps as substitutes for those initially promulgated, the Postal Service will respond to those instead of the originals.

The problems with the interrogatory set are threefold. First, questions 2, 5, 8, 11, and 14 ask for input data necessary to run the computer programs in five library references, for each fiscal quarter. In effect, this asks for the raw data from the five subsystems of TRACS (Highway, Freight Rail, Passenger Rail, Commercial Air and Network Air) for three separate steps: sample selection, editing, and expansion programs. The inputs to the expansion programs have already been provided in library references USPS-LR-I-49 through 53. The data input files for the editing programs amount to over 150 files, while the total number of files requested by this set of interrogatories (including inputs, programs and SAS logs) far exceeds 400.

Such information is inherently sensitive since it embodies postal management's judgments on how best to move mail around the country. Moreover, producing them is quite burdensome. Notwithstanding, the Postal Service is endeavoring to provide these in an encrypted form that shields the most sensitive information (like facility code) but permits an analyst to run the programs. Protective conditions will still be necessary for the encrypted files, which will be made available in a library reference when they are complete. The current projection for completion is March 7, 2000.

However, since the underlying subsystems are "live" in the sense that they are in a constant state of change, provision of sample selection programs requires snapshots from the past. These data are not available since such snapshots have not been retained. SAS log files generated by running the sample selection files are only available in hard copy only. While UPS indicated that it may not need the eight roughly four-inch binders of paper that comprise these log files, UPS has not withdrawn its request. The Postal Service has accordingly retained contractors who are in the

process of redacting from those log files the commercially sensitive information that identifies where the tests were conducted and routing information, so that assuming UPS' continued interest, they can be made available.

The second and third trouble areas with the interrogatory set are both ASCII related.¹ Interrogatories 2, 5, 8, 11, and 14 ask for input data files in ASCII format, while interrogatories 3, 6, 9, 12, and 15 ask for output data files in ASCII. TRACS files are one of two types: some are in SAS format and others are flat files (which are produced in ASCII format). If, as UPS counsel assures the undersigned counsel, the purpose of these interrogatories is generally to familiarize UPS with the TRACS data system and not to obtain commercially sensitive information in the guise of discovery responses, providing SAS files in ASCII -- aside from being very burdensome to produce -- are of no utility in verifying how the TRACS system works and that the correct results have been achieved since they would need to be reconverted to SAS format in order to run.

The Postal Service therefore partially objects to interrogatories UPS/USPS-T1-2-3, 5-6, 8-9, 11-12 and 14-15 on the grounds of burden, relevance, trade secret and commercial sensitivity. The Postal Service is working to prepare responses to the interrogatories within the limitations indicated above; these responses can be made available under the protective conditions set forth in the Motion of United States Postal Service For Waiver and for Protective Conditions for Analysis of Witness Yezer, filed January 12, 2000 (as supplemented by the provision of two missing lines of text in the Response of United States Postal Service to Presiding Officer's Ruling No. R2000-1/3, filed February 24, 2000).

¹ UPS informally indicated that the request for ASCII files initially stemmed from the fact that some files were improperly provided in EBCDIC rather than ASCII. This error was corrected via filing of replacement compact discs on February 3, 2000, thus the need for ASCII beyond what the Postal Service agrees to provide herein may be moot.

Protective conditions, moreover, will still be necessary for this material because an informed analyst will nonetheless be able to deduce some of the original information the Postal Service is attempting to mask. Protective conditions are also appropriate because the sophistication of the masking techniques is not especially high.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Kenneth N. Hollies

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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