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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

OBJECTION OF UNITED STATES POSTAL SERVICE
TO MPA INTERROGATORIES MPA/USPS-T13-6, 7, 10, 12, 14, 17, 19, 45-47, 50
AND 56 TO WITNESS RAYMOND
(February 18, 2000)

The United States Postal Service hereby objects to interrogatories UPS/
USPS-T13-6, 7, 10, 12, 14, 17, 19, 45-47, 50 and 56, filed on February 17, 2000.

Interrogatory 6 for a description of all techniques used to develop methods and time studies mentioned tangentially in witness Raymond's testimony. The Postal Service objects to provision of this information. The data relied upon by witnesses Raymond and Baron in support of their testimonies has already been provided in their library references. Any other information gathered for the internal purposes of the Postal Service is not within the scope of their testimony, nor directly relevant to it. The time studies, and methods mentioned in passing in witness Raymond's testimony are not relevant to the data provided to witness Baron by witness Raymond, and do not underlie the Postal Service's cost and revenue testimony in this case. Furthermore, any collateral studies or methods performed or used by witness Raymond concern proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, but could also compromise its position in future labor negotiations.

Similarly, the Postal Service objects to interrogatory 7, which requests a copy of the methods analysis and time values for standard developed during the Raymond study and an indication of methods used. The data relied upon by witnesses Raymond and Baron in support of their testimonies has already been provided in their library references. Any other information gathered or developed for the internal purposes of the Postal Service is not within the scope of their testimony, nor directly relevant to it. The time studies, and methods mentioned in passing in witness Raymond's testimony are not relevant to the data provided to witness Baron by witness Raymond, and do not underlie the Postal Service's cost and revenue testimony in this case. Furthermore, any collateral studies or methods performed or used by witness Raymond concern proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, but could also compromise its position in future labor negotiations.

The Postal Service also objects to interrogatory 10, insofar as it requests information on data collection team activities not relevant to the data produced by witness Raymond for use by witness Baron. The grounds for objection are the same as those stated above with respect to collateral study information requested in interrogatories 6 and 7.

Interrogatory 12, which requests a copy of a pilot study report, is similarly objectionable, insofar as the pilot study was not the subject of witness Raymond's testimony, and is in not connected to the data relied upon by witness Baron. Furthermore, this report concerns proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, but could also compromise its position in future labor negotiations.

Interrogatory 14 requests the witness to identify any data used by him during the

preparation of his testimony that was not collected by a full-time employee of Resource & Process Metrics, Inc., the identity of the individuals who performed the collection, and the company or organization that such individuals are affiliated with. The Postal Service objects to this interrogatory as overbroad, in that it seeks irrelevant personal names and other information of no relevance to this proceeding. The relevance of whether individuals were full-time employees of Resource & Process Metrics, Inc. also has not been established.

Interrogatory 17 requests all work plans, data collection sheets, approach/methods, and process review documents or reports prepared for, or in connection with, both Phase 1 and Phase 2 of witness Raymond's study. The Postal Service objects to this interrogatory as overbroad, in that it seeks information not related to the data produced by witness Raymond for use by witness Baron in this proceeding. Furthermore, this information includes proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, its contractors and subcontractors, but could also compromise the position of the Postal Service in future labor negotiations. Moreover, since over 200 linear feet of documents would need to be searched to provide the information requested, the interrogatory would also impose an undue burden.

The Postal Service also objects to interrogatory 19, which requests copies of all requests and other materials provided to the regions, with respect to site selection for both Phase 1 and Phase 2. This interrogatory is overbroad, and would impose an undue burden to unearth all such requested materials. Furthermore, this information could include proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, its contractors and subcontractors, but could also compromise the position of the Postal Service in future

labor negotiations. The Postal Service suggests that a redacted, representative sampling would suffice to demonstrate the site selection process.

The Postal Service also objects to interrogatories 45, 46, 47 and 50 which request any records relating to changes in data that were made or requested, or requested but not made, in the course of witness Raymond's study. To provide this information would require a detailed search of over 200 linear feet of documentation and copying of approximately 8,000 pages, an undue burden. Furthermore, this information could include proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, its contractors and subcontractors, but could also compromise the position of the Postal Service in future labor negotiations. The Postal Service again suggests that a redacted representative sampling would be a more reasonable request.

Finally, the Postal Service objects to interrogatory 56, which requests, as to each route/day, the total time and total tallies collected. This information is not relevant to the data at issue in the testimonies of witnesses Raymond and Baron. Furthermore, this information includes proprietary, commercially sensitive information, which, if disclosed, could harm not only the commercial interests of the Postal Service, its

contractors and subcontractors, but could also compromise the position of the Postal Service in future labor negotiations.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

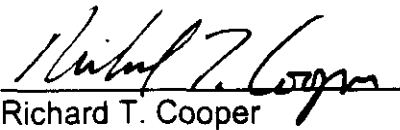
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February 18, 2000

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.


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