

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 OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T9-20(a), 21(a) & (f), 22(e) & (f), 23(a) & (d), and 24(a), (b) & (e))
(February 28, 2000)

The Postal Service hereby objects to the following interrogatories: OCA/USPS-T9-20(a), 21(a) & (f), 22(e) & (f), 23(a) & (d), and 24(a), (b) & (e). These questions follow:

- 20 (a) Please explain why the USPS makes late payments to its contractors.
- 21 (a) Please explain why the USPS made untimely payments to the Thrift Savings Plan.
- 21 (f) Did the late payment(s) facilitate the USPS's ability to optimize its cash management objectives? If so, please explain.
- 22 (e) What collection measures does the USPS take to recover its bad debts?
- 22 (f) How long does the USPS attempt to recover a bad debt before it is written off?
- 23 (a) Please identify the types of training conducted by these contractors.
- 23 (d) Has the USPS taken any steps to reduce the amount spent on contract instructors? If so, please identify all measures taken. If not, please explain why the USPS does not plan on reducing the amount spent on contract instructors.
- 24 (a) Are business-use-only phones installed in the USPS employees' private residences?
- 24 (b) If your response to part "a" of this interrogatory is negative, please explain how the USPS controls the usage of a private residential phone.
- 24 (e) Please identify and explain the criteria the USPS uses in determining whether the Postal Service will provide an employee with private residence telephone service. Provide copies of documents that relate to the criteria.

These questions are interspersed with unobjectionable questions concerning details of certain actual and estimated expenses, which will be answered. The questions identified as objectionable are all of a similar nature, in that they appear to be second guessing certain Postal Service financial, operational, or administrative practices which are a natural consequence of doing business. These expenses have been certified by the auditors as having occurred and as having been appropriately included as Postal Service expenses. It is not within the scope of the ratemaking process for the OCA to question the appropriateness of day-to-day Postal Service expenses, or of operating, financial, or administrative practices. Such an inquiry seeks information that is irrelevant to an analysis of the revenue requirement.

Moreover, it would be burdensome to contact the numerous sources necessary to provide answers to these inquiries. Short of actually seeking the answers, it is not possible to quantify the time involved, since the number and location of persons with information on this variety of subjects is not known. In light of the lack of relevance of the information sought, the burden in answering the questions, or even attempting to locate all of the offices and/or individuals with knowledge relevant to the inquisitorial questions objected to herein, cannot be justified.

Accordingly, the Postal Service objects to the above-enumerated questions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

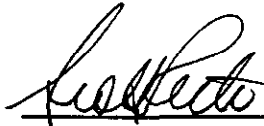


Scott L. Reiter

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February 28, 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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