

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 ADVO INTERROGATORIES ADVO/USPS-T13-2 AND 19(c)  
TO WITNESS RAYMOND  
(March 3, 2000)

The United States Postal Service hereby objects to interrogatories ADVO/USPS-T13-2 and 19(c), filed on February 22, 2000. Interrogatory 2 requests, with respect to the specific project which generated the data presented in witness Raymond's testimony, the following: (a) A full description of the "original work plan" proposed to the USPS for each contract performed on this specific project, (b) The statement of work and list of deliverables for each contract performed by witness Raymond on this specific project, (c) a list of reports, analyses, and all other documentation he prepared on each contract he performed on this specific project, and (d) Contract initiation and completion dates for each contract he performed on this specific project.

Although it appears that counsel for ADVO made an effort to restrict the scope of its requests to matters directly relevant to the data used by witness Raymond for purposes of his testimony, and to exclude other matter produced by the witness for other purposes, the form of the question still implicates matters having no relation to the data at issue in his testimony. This is in part due to the peculiar contractual history of witness Raymond's work with the Postal Service. Mr. Raymond has contributed to the study of Postal Service costs in a number of capacities over the years: as an employee of a large consulting firm with a contractual relationship with the Postal Service, and as

a principal in his own independent consulting firm, which, in turn, has functioned as a subcontractor to two different major consulting firms. In these many capacities, Mr. Raymond has worked under many contracts, each contributing to some extent to the generation of the data presented in witness Raymond's testimony. Furthermore, the scope of many of these contracts has been broad, and has covered a variety of matters not directly relevant to his testimony in this case.

In these circumstances, for the witness to provide each of the requested work plans, statements of work, lists of deliverables, reports, analyses, and all other documentation prepared on each contract would not only entail a substantial burden, but would inevitably require the disclosure of confidential information pertaining not only to the Postal Service, but also to the firms with which the witness has been associated. It would furthermore require the disclosure of information having no direct relevance to the data at issue in the testimonies of witnesses Raymond and Baron. With respect to the Postal Service, moreover, various of the requested documents contain sensitive information that could compromise future negotiations between the Postal Service and its labor unions. Finally, some of the information is commercially sensitive insofar as it would provide to competitors of the Postal Service valuable information regarding efficient materials handling practices.

Because of the difficulty inherent in attempting to unscramble this egg, and the likelihood that any response would disclose sensitive information having to do with matters other than the data relied upon by the Postal Service in this case, the Postal Service must object to provision of the requested information..

Interrogatory 19(c), in connection to the use of the Engineered Standards data for support and updating of the Street Time Survey, requests copies of all requests, proposals, instructions and correspondence with the USPS and/or USPS contractor representatives relating to such use of the ES data. The Postal Service objects to this

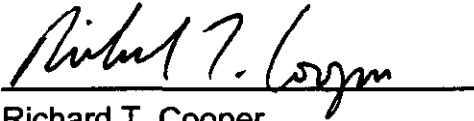
question for a number of reasons. The question is overbroad insofar as it would require production of all correspondence relating to the use of ES data to update the STS, regardless of how trivial or inconsequential. Moreover, in order to identify and produce all of the requested documents, the witness would have to comb through over one hundred linear feet of documents compiled over the course of his study, an undue burden given the unfocussed nature of the question and the limited relevance of the information sought. Furthermore, the question is objectionable insofar as it could require the disclosure of discussions of litigation strategy, or other privileged communications.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

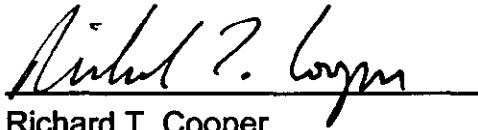
A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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March 3, 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.

  
Richard T. Cooper

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