

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

UNITED STATES POSTAL SERVICE OBJECTION
TO INTERROGATORY DBP/USPS-13
(March 16, 2000)

The United States Postal Service hereby objects to interrogatory DBP/USPS-13, filed on March 10, 2000. That interrogatory requests that the Postal Service produce copies of "any Special Services audits that have been conducted since 1990 [the date on which the Postal Service was to conduct a study of return receipts] in any area in the country, including the Northeast Area." Based on discussions with the Manager, Special Services, the Postal Service does not believe that any such audits exist, except for the report that has already been provided as library reference I-200.

Nonetheless, to the extent that this interrogatory requires the Postal Service to do a thorough review of all Inspector General and Inspection Service to determine if there are any that concern special services, the Postal Service objects to this interrogatory on grounds of relevance, burden, overbreadth, commercial sensitivity, and privilege. This request is overbroad because it asks for all special services audits, some of which may have no relevance to issues in this proceeding. Much of the auditing by the Inspection Service and the

Inspector General involves operations at particular facilities, and other issues not related to issues affecting the rate case. Many hundreds of audits have been conducted by the Inspector General and the Inspection Service since 1990, and are identified only generally in semiannual indexes. The burden involved in identifying which audits relate to "Special Services", or verifying that none of the audits concern special services, would be undue, involving perhaps 15 to 25 hours. In addition, the documents cannot be publicly disclosed if they contain proprietary and commercially sensitive information. Finally, the documents could contain attorney-client, attorney work product, predecisional, and law enforcement-related communications that are subject to any one of a number of privileges, including the attorney client, deliberative process, attorney work product, and law enforcement privileges.

The Postal Service notes, moreover, that it has already provided the semiannual reports of the Inspector General in USPS LR-I-181 in response to interrogatory OCA/USPS-7. These reports, as supplemented in the Postal Service's response to interrogatory DFC/USPS-25, provide an index of audits by both the Inspector General and the Inspection Service since 1997, and should

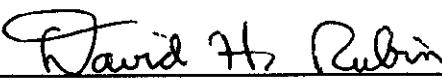
provide ample information about the audit activities of the Office of Inspector General and the Inspection Service for purposes of this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

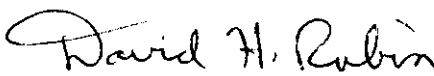
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March 16, 2000

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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