

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 INTERROGATORY
UPS/USPS-T5-28
(March 23, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T5-28, filed March 13, 2000, on the grounds of burden, vagueness, redundancy and relevance.

The interrogatory states:

UPS/USPS-T5-28. Provide a copy of any audit results concerning the accuracy or inaccuracy of BY 1998 postage statements.

- (a) Explain whether each such audit provides for verification procedures of actual mail delivered by the mailer against what was indicated by the mailer on the postage statement. If so, describe these procedures.
- (b) Explain whether each such audit determines the number of errors discovered by mail class, subclass and error type. If so, provide the results of all such determinations.
- (c) Include all documents and analyses related to each such audit. If an audit was not performed, explain in detail why not.

The broad sweep of this interrogatory together with its inherent vagueness and the fact that similar interrogatories have already been answered compel this objection.

The word "audit" is susceptible of several interpretations; for purposes of this objection five potential meanings are considered. First, since the CRA's as reported to the Commission on a regular basis and costs and revenues utilized by the Postal Service's case in chief depend in major respects upon information culled from postal statements, the term audit could be taken here as relating to the audited financial

statements of the Postal Service. These have already been provided so the interrogatory is redundant if interpreted in this way.

Second, the term "audit" could be understood as verification of postage statements as typically performed by Business Mail Entry Units. The witness to whom this interrogatory was posed has already provided information obtained from other postal officials regarding this process. See the response to UPS/USPS-T5-20 (March 10, 2000). As such, this interpretation of "audit" also makes the interrogatory redundant. Since the interrogatory seeks the production of audits, and postage statement verifications take place throughout the country, compiling reports of such audits would be excessively burdensome, calling for many months of exclusive devotion to the task by numerous postal officials; as such, the interrogatory is also burdensome.

Third and fourth, since the Inspection Service and the Office of the Inspector General conduct what are sometimes called "audits", the interrogatory could be taken as asking whether either has audited BY 98 postage statements. The Postal Service has fielded various interrogatories regarding what the Inspection Service and the Office of the Inspector General have and have not done. The Postal Service response has been to file USPS-LR-181, which lists recent reports by both. Should UPS be interested in any of those reports, they can be requested individually. As such, interrogatory UPS/USPS-T5-28 is redundant and vague both.

Fifth, the interrogatory could be understood as asking whether the Postal Service has asked an accounting firm to audit the BY 98 mailing statements themselves. Beyond what is described above and in the testimony of its witnesses, the response is "no". Interpreted in this way, the interrogatory is burdensome to search for further information, still vague, redundant and, to the extent it exceeds the bounds discussed herein, irrelevant.

WHEREFORE, the United States Postal Service objects to interrogatory
UPS/USPS-T5-28.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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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