

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

RESPONSE AND OPPOSITION OF UNITED STATES POSTAL SERVICE  
TO MOTION OF UNITED PARCEL SERVICE TO COMPEL PRODUCTION  
OF INFORMATION REQUESTED IN  
INTERROGATORY UPS/USPS-T16-4 TO WITNESS DEGEN  
(March 23, 2000)

United Parcel Service (UPS) filed a March 16, 2000 motion to compel a response to interrogatory UPS/USPS-T16-4 (Motion), to which the Postal Service had objected.<sup>1</sup> The original form of the interrogatory requested a version of the IOCS data file which included all variables that were not relied upon to produce the CRA report. The Motion dramatically narrows the scope of the request to four paired sets of variables relating to optionally entered remarks, any one pair of which might pertain to one of approximately thirty possible IOCS questions. Around 110,000 records contain remarks. UPS further narrows its request by stating that its purpose is to elicit any remark that "consist[s] of the data collectors' comments on why mixed mail was not counted and why the top piece rule was not applied".<sup>2</sup>

The Postal Service is prepared to respond affirmatively to the interrogatory by providing an electronic file identifying each IOCS record that contains remarks from

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<sup>1</sup> Objection of United States Postal Service to Interrogatory of United Parcel Service (March 3, 2000).

<sup>2</sup> The information sought by UPS could be entered in any of the four pairs of remark fields, but relates only to questions 21B, 21C and 21D. As such, only three of the approximately thirty possible remarks contain information responsive to the purpose of UPS's inquiry.

questions 21B, 21C, and 21D, the remark type, and the content of those remarks.<sup>3</sup> This would provide ready and comparatively expeditious insight into the information bearing on UPS' espoused purpose. Moreover, the undersigned counsel understands from UPS counsel that UPS' interest lies in working with electronic rather than hard copy records, and an electronic file will permit UPS to identify the rest of the contents of a given IOCS record with material already available.

Postal officials are nonetheless concerned that the remarks may contain sensitive information in the form of references to specific employees or facilities, or information that might be construed as partaking of an overly personal nature. An initial review suggests that approximately 5 percent of the records may contain such information. The Postal Service would therefore undertake to mask that information in the electronic copy to be provided by, for example, overwriting facility specific references with "[place]" and employee references with "[person]" or similar appellations. Any personal information will be masked in some comparable fashion. No information pertinent to the purposes for which UPS seeks it would be masked. The result of this masking effort would permit the responsive information to be used without protective conditions. If the Presiding Officer rules that the Postal Service should respond as described herein, the response could be made available within a few days in the form of an interrogatory response and supporting library reference. Should

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<sup>3</sup> In FY 1998, there were about 3400 remarks associated with question 21. These have remark types 21B-21F. Remark type 21B is used to describe the item in question 21B, when choice "g. Other Item" is selected. Remark types 21E and 21F also apply to question 21B. Remark type 21E is used to explain why the "top piece rule" could not be applied for a bundle or a tray, while remark type 21F is used to explain why the item could not be counted for items other than trays or bundles. Remark type 21C is used to describe the container question 21C, when choice "j. Other Container" is selected. Remark type 21D describes the item in question 21D (container percentages by item type) when choice "i. Other Item(s)" is selected. These are explained in USPS-LR-I-12, Appendix A at 30.

the Presiding Officer instead require the Postal Service to identify the 110,000 records containing remarks, reviewing and masking that number of records would likely require several additional weeks of effort.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

*K N Hollies*

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Kenneth N. Hollies

#### 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.

*K N Hollies*

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