

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-T13-38, 40
TO WITNESS RAYMOND
(March 27, 2000)

The United States Postal Service hereby objects to interrogatories ADVO/USPS-T13-38 and 40, filed on March 15, 2000.

Interrogatory 38 requests provision of an amended version of the database provided in USPS-LR-163, in both hardcopy and electronic form, with additional information that would enable matching of data collectors with tallies. While it is unclear at this point whether the Postal Service can provide the requested information, it is quite clear that to provide both hardcopy and electronic forms of the same data is both unnecessary and unduly burdensome, both to the Postal Service and to the record. The Postal Service thus objects to that portion of the question that requests redundant provision of hardcopy in addition to electronic media.

Interrogatory 40 requests, with respect to each contract under which witness Raymond performed while generating the data presented in his testimony, (a) a full description of the the original workplans proposed to the USPS, (b), the statement of work and list of deliverables for each contract, (c) lists of reports, analyses, and all other documentation prepared on each contract, (d) contract initiation and completion dates for each contract and (e) and an explanation of the manner in which each contract contributed to the generation of his data. With the exception of item (e), this interrogatory is almost a verbatim repetition of an earlier Advo interrogatory, ADVO/USPS-T13-2, to this same witness. The interrogatory thus is clearly objectionable as redundant and

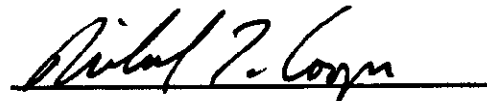
cumulative. Moreover, as Advo must be aware, the earlier interrogatory was the subject of a discovery dispute resulting in the issuance of Presiding Officer's Ruling No. R2000-1/18, which directs the Postal Service to provide a response under protective conditions. To the extent that this ruling concerns the very information now sought, it is dispositive, and Advo must seek the information under the protective conditions set out in the ruling. To the extent that Advo believes that the ruling is not controlling, the Postal Service relies on the objections it raised in the earlier dispute, and applies them to all aspects of interrogatory 40.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

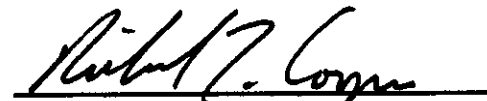


Richard T. Cooper

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March 27, 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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