

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-T5-30
(March 27, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T5-30, docketed March 17, 2000, on the grounds of burden and redundancy.

The interrogatory asks for SAS logs for each of three jobs and four quarters, for a total of twelve. The SAS files were not previously retained but could be re-created. Because of the needs to work on the San Mateo mainframe, coordinate the locating of correct files and assure consistency with what already has been provided, and review and mask user access information, the Postal Service estimates that each of the twelve will require a half day's effort on average. Just running the three job sequence for a single quarter takes 2-3 hours assuming the mainframe is not busy, in which case a full day would be required.

The interrogatory is redundant because UPS has previously requested, and been provided, copies of the job files themselves; this means UPS can run the jobs and create its own log files. Since UPS claims (to counsel) it will only take them five hours to create the SAS log files, UPS should do so.

UPS may claim that the purpose of filing the interrogatory was because of difficulty in replicating witness Hunter's results. The Postal Service has already devoted many hours of attorney and witness time to resolving the small problems it encountered in replicating the results on its different computer and operating systems. The

undersigned counsel understands that the last problem reports from UPS relate to its failure to apply a correct blow-up factor, but that otherwise it has already succeeded in replicating the numeric results of witness Hunter's. Accordingly, the interrogatory is redundant and burdensome.

Owing to continuing difficulties with the exchange of email and the necessities of other work, the undersigned counsel has not yet been able to complete the exchange of information with UPS counsel to verify that the replication has succeeded. The Postal Service expects to continuing work with UPS to assure that the replication does succeed in replicating witness Hunter's quantitative results.


WHEREFORE, the United States Postal Service objects to interrogatory UPS/USPS-T5-30.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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.



Kenneth N. Hollies

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