

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

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
UNITED PARCEL SERVICE INTERROGATORIES
(UPS/USPS-T15-22(b) and 30(c) and (d))
(April 3, 2000)

The United States Postal Service hereby objects in part to United Parcel Service interrogatories UPS/USPS-T15-22(b) and 30(c) and (d) directed to witness Bozzo on March 23, 2000. The partial objections are based on relevance and burden.

UPS/USPS-T15-22(b) states:

Section II of Library Reference USPS-LR-I-107 describes an EPL data file called *usps.qtfp* with annual prices for postal equipment from FY 1968 to FY 1998, and a program file *asset.prices.epi* which uses *usps.qtfp* to output a text file called *prices* containing annual national prices for four postal asset types (CSE, PSE, AHE, and MHE).

(a) Does *usps.qtfp* contain more price information than that contained in *prices*?

(b) If your answer to part (a) is yes, provide an Excel data file containing the data in *usps.qtfp*, along with a description of the variables contained in this file.

The data file *usps.qtfp* contains all of the data used to compute quarterly total factor productivity and a great deal of that material that was not used by witness Bozzo. In fact, it contains a great deal of data that has nothing to do with either mail processing or even clerks and mailhandlers. For example, it contains transportation data taken from

trial balance accounts.¹ The information requested in subpart (b) thus is irrelevant to witness Bozzo's analysis. Providing all of the material also would be burdensome. The Postal Service is prepared, however, to respond to the interrogatory with reference to the subset of variables used by witness Bozzo.

UPS/USPS-T15-30(c) and (d) state:

The actual program *asset.prices.epl*, contained in Section II of Library Reference, USPS-LR-I-107, uses as an input the EPL data file *usps.tfp*, yet on pages 27-28 of Library Reference USPS-LR-I-107, in your description of *asset.prices.epl*, you describe the input file as *usps.qtfp*. Is *usps.tfp* the same as *usps.qtfp*? Which is the correct name for the file? The remainder of this and other questions, refer to the EPL data file used by *asset.prices.epl* by the name *usps.qtfp*.

* * * *

(c) Provide the program file or files which process the original source data to create the EPL data file *usps.qtfp*.

(d) Provide a complete list with definitions of all variables contained in *usps.qtfp*.

As discussed above, the file *usps.qtfp* contains data not used in witness Bozzo's analysis and not related to mail processing or clerks and mailhandlers. This material is not relevant. Also, because a great deal of material is included, it would be burdensome to produce. As with the earlier-discussed interrogatory, the Postal Service will respond with regard to the subset of variables used by witness Bozzo to the extent such information has not already been provided.

^{1/} Much of the information in *usps.qtfp* is available from other sources. For example, USPS-LR-I-9 contain the FY 1998 trial balance. Witness Meehan's Cost Segment 14 spreadsheets contained in her B Workpapers and numerous other library references in this case contain data relating to transportation.

For the foregoing reasons, the Postal Service objects in part to interrogatories
UPS/USPS-T15-22(b) and 30(c) and (d).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Susan M. Duchek

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.



Susan M. Duchek

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