

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
INTERROGATORIES OF NATIONAL NEWSPAPER ASSOCIATION,
NNA/USPS-T5-36, 39
(April 3, 2000)

The United States Postal Service hereby objects to interrogatories NNA/USPS-T5-36 and 39 on the grounds of burden, relevance and materiality. These interrogatories seek information that is not needed used to develop witness Hunter's testimony regarding BY1998 Bulk Revenue, Pieces and Weight. As such, they appear instead to be intended to elicit information that could be used to support NNA's own direct case. Accordingly, this objection may simply serve to protect the Postal Service's rights until it has time properly to investigate the broad requests. In any event, any responses would most certainly not be timely, given the current workload borne by witness Hunter.

NNA/USPS-T5-36. This interrogatory requests the production of information from FY86 or FY87 through FY99 regarding a) the total number of offices; b) Periodicals revenue; c) offices with no Periodicals revenue for i) any given year or ii) any two years; d) offices whose Periodicals revenue change from zero to non-zero and back; e) offices that have consecutive years of non-zero Periodicals revenue; f) several other similar year-to year fluctuations; and g) how the BRPW sampling procedure identified in USPS-LR-I-26 accounts for the fluctuations. The bases for the objection are burden, relevance, and materiality. While it is not clear whether the information is available, especially for the older years, even the burden of looking cannot be

undertaken in the present procedural context of witness Hunter's testimony. If the response turns out to be that the information simply is unavailable, that response will eventually be provided. Witness Hunter will endeavor to provide some responsive information for the more recent fiscal years and answer the last part of the interrogatory.

NNA/USPS-T5-39. This interrogatory points to four pieces of information provided by witness Hunter (two library references and two interrogatory responses) in an attempt to lay a foundation for requesting various details of In-County volume from FY86 through FY97, including blowup factors, samples sizes per stratum, and sample means and counts per stratum. The Postal Service does not believe the information is available, especially for the older years, and if that proves to be the answer an interrogatory response to that effect can be filed. One of the four foundations for the question is that witness Hunter was able to provide one type of information back to FY86. See the response to NNA/USPS-T5-4. However, as indicated in the body of that response, that information was obtained from publicly available Cost and Revenue Analysis reports which NNA could just as well have obtained on its own. The details now sought are not equally available.

The Postal Service will attempt to provide some responsive information. However, the burden of undertaking to determine what is reasonably available has yet

to occur; moreover, whatever is provided is unlikely to be filed within fourteen days of the filing of the interrogatory.

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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April 3, 2000