

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-T13-105 and 107(f), filed on March 23, 2000.

Interrogatory 105 requests, with respect to both Phase 1 and Phase 2 of
witness Raymond's "data collection effort", "all work plans or similar documents
concerning the design, approach, methods, documentation, and collection of the data,"
"all periodic progress reports, interim reports, and final reports submitted to the Postal
Service," "all summaries and/or conclusions submitted to the Postal Service regarding
the data collection or its results," "all recommendations submitted to the Postal Service
regarding the data collection or its results," and all documents related to the above
categories.

The Postal Service objects to this interrogatory on the same grounds that it
objected to its very similar previous incarnations, Advo interrogatories 2 and 40. As
shown in previous objections and oppositions to motions to compel involving interroga-
tories of Advo and MPA, these broad, sweeping dragnets for virtually every scrap of
paper associated with witness Raymond's data collection implicate hundreds of linear
feet of documentation, much of it containing confidential, commercially sensitive
information to be used in future labor negotiations. It is apparent that the burden of
production of this information far outweighs its probative value, especially those large
portions that have nothing to do with the data used by the Postal Service in this case.

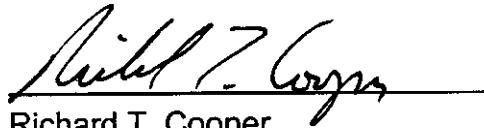
The Postal Service also objects to Interrogatory 107(f), which requests analyses or results which used the data contained in LR-I-163 to develop time standards, including all documents relating to such use. Since the data in LR-I-163 are a subset of a larger data base ultimately used to develop time standards for the Postal Service, this interrogatory again implicates hundreds of confidential, commercially sensitive reports which would be burdensome to produce, and which have already been subjected to rulings by the Presiding Officer. Furthermore, the Postal Service continues to maintain that the "time standards" ultimately developed are not needed to test the validity and reliability of the data contained in LR-I-163 for the purposes of this case, which does not involve time standards in any way.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in dark ink, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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April 3, 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.

A handwritten signature in black ink, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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April 3, 2000