

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 THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF MAGAZINE PUBLISHERS OF AMERICA, INC.
(MPA/USPS-21, 36(c) and 37(c))
(April 5, 2000)

The United States Postal Service hereby objects to Magazine Publishers of America, Inc. interrogatory MPA/USPS-21, 36(c) and 37(c). The information is irrelevant, commercially sensitive, or would be burdensome to produce.

MPA/USPS-21 states:

For each Amtrak segment, please provide all capacity adjustments, including the date of the adjustment and before/after values of linear feet and cost, occurring between FY96 and BY98 inclusive.

The relevance of this disaggregated information is not clear. The cost pool for Amtrak speaks for itself. Information on capacity adjustments by segment (which basically means by O-D pair) adds nothing of value to the record. In addition, the Postal Service will be providing a redacted copy of the Amtrak contract in response to MPA/USPS-19.¹ Moreover, capacity adjustments, the before/after values of linear feet, and cost by segment are commercially sensitive to both the Postal Service and Amtrak. Both competitors and potential transportation providers could make use of this information to

^{1/} Basically, the Postal Service will provide the contractual language, but not attachments containing specific volume or cost-related information that is deemed commercially sensitive. An attachment to the contract which contains the basic information requested in the above-discussed interrogatory is not provided in the publicly-released versions of the contract and will not be provided here.

the obvious detriment of the Postal Service. Also, Amtrak considers this information commercially sensitive and does not want it revealed to its other customers or competitors.

MPA/USPS-36(c) states:

Reference is made to highway transportation contracts wherein service is purchased on a per-trip (as opposed to regularly scheduled) basis:

* * * *

c. In machine-readable form, please identify each such highway contract, and state the actual payments made under each such contract in BY98.

First, the requested information is irrelevant. A full variability analysis of purchased highway transportation has been presented by Dr. Bradley, USPS-T-18, including the full database from the Highway Contract Support System (HCSS) that he used. This analysis is not materially different from that presented by Dr. Bradley and accepted by the Commission in Docket No. R97-1. It is far from clear why the requested information is needed. In addition, the information would be burdensome to obtain. The entire HCSS database at all 13 Distribution Network Offices (DNOs) would have to be queried for this information. It is estimated that this will take a week or longer, depending on other work commitments of DNO personnel. In addition, once this information is obtained, a new computer program would have to be written to merge the HCSS query results with accounting system data. This latter step will take at least another several days. This burden is not warranted, given the questionable need for the information.

MPA/USPS-37(c) states:

Reference is made to highway transportation contracts wherein service is purchased on a one-way (as opposed to round trip) basis:

c. In machine-readable form, please identify each such highway contract.

Again, as with MPA/USPS-36(c), the information is of doubtful relevance. Also, as with MPA/USPS-36(c), the request is burdensome. The entire HCSS database at all 13 DNOs would have to be queried to obtain the information and this would take a week or more.

For all of the above reasons, the Postal Service should not have to provide responses to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
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